7/17/02
Qwest Overview
Reply Brief
thru
9/19/02
Order Re: Checklist
1,11,13 : H

07/01/02 - Midcontinent's Post Hearing Brief;
07/01/02 - AT&T's Brief Regarding Public Interest;
07/01/02 - AT&T's Brief Regarding Qwest's Change Management Process;
07/01/02 - Response Brief of AT&T Regarding Paper Workshop Issues;
07/01/02 - AT&T's Responsive Post-Hearing Brief to Qwest's Post-Hearing Brief in Support of the QPAP and Request for Additional Supplementation of the Record;
07/01/02 - AT&T's Response to Qwest's Opening Post-Hearing Brief on Emerging Services;
07/01/02 - AT&T's Brief Regarding Qwest's Interconnection Obligations;
07/01/02 - AT&T's Brief on Checklist Items 2, 5 and 6 and Section 272 Compliance;
07/01/02 - Response Brief of AT&T Regarding Checklist Item 4 - Unbundled Loops and Checklist Item 11 - Local Number Portability;
07/02/02 - Intervenor Black Hills FiberCom's Response to Qwest's Post-Hearing Brief;
07/03/02 - AT&T's Comments on the ROC OSS Final Report;
07/03/02 - Qwest's Verified Comments;
07/03/02 - Request for Confidential Treatment;
07/03/02 - Staff's Comments;
07/10/02 - Midcontinent's Joinder in Staff's Position on Public Interest;
07/15/02 - Transcript of Hearing held 7/11/02;
07/17/02 - Qwest's Overview Reply Brief;
07/17/02 - Qwest's Post-Hearing Reply Brief on Compliance with the 14-Point Competitive Checklist;
07/17/02 - Qwest's Reply Brief in Support of the QPAP;
07/17/02 - Qwest's Post-Hearing Reply Brief on General Terms and Conditions, Section 272, and Track A;
07/17/02 - Qwest's Post-Hearing Reply Brief on the Public Interest;
07/17/02 - Qwest's Post-Hearing Reply Brief Regarding Change Management;
07/17/02 - Qwest's Exhibit 92;
07/17/02 - Qwest's Exhibit 93;
07/17/02 - Certificate of Service;
07/22/02 - Motion for Withdrawal of Counsel (Gregory J. Bernard);
07/22/02 - Request for Confidential Treatment of Information;
08/12/02 - Qwest Performance Results - Regional and South Dakota - July 2001 - June 2002;
09/19/02 - Procedural History; Order Regarding Checklist Items 3, 7, 8, 9, 10 and 12;
09/19/02 - Order Regarding Checklist Items 1, 11, 13 and 14;
09/25/02 - Qwest's Notice of Updated Statement of Generally Available Terms and Conditions;
09/27/02 - AT&T's Motion to Reopen and Supplement the Record;
09/30/02 - Qwest's Request for Acceptance of PO-20 for Inclusion in the QPAP;
09/30/02 - Memorandum in Support of Qwest's Request for Acceptance of PO-20 for Inclusion in the QPAP;
10/07/02 - Certificate of Service;
10/10/02 - AT&T and WorldCom's Comments on Qwest's Proposed PO-20 Measurement;
10/10/02 - Opposition of Qwest to AT&T's Motion to Reopen and Supplement the Record;
10/16/02 - AT&T's Notice of Supplemental Authority Regarding PO-20;
10/24/02 - Notice of Supplemental Authority Denying AT&T's Motion to Reopen the Record;
10/25/02 - Notice of Supplemental Authority Denying AT&T's Motion to Reopen the Record;
11/12/02 - Order Regarding General Terms and Conditions and Track A;
11/12/02 - Order Regarding Checklist Items 2, 4, 5, and 6;
11/18/02 - Qwest's Notice of Updated Statement of Generally Available Terms

LAW OFFICES
MAY, ADAM, GERDES & THOMPSON LLP
503 SOUTH PIERRE STREET
P.O. BOX 160
PIERRE, SOUTH DAKOTA 57501-0160
(605) 224-8803
FAX (605) 224-6289

THOMAS C. ADAM
DAVID A. GERDES
CHARLES M. THOMPSON
ROBERT B. ANDERSON
BRENT A. WILBUR
TIMOTHY M. ENGEL
MICHAEL F. SHAW
NEIL FULTON
BOBBI J. BENSON
BRETT KOENECKE

OF COUNSEL
CHARLES B. KAY
JOHN R. MORRIS (RETIRED)
JOHN E. SIMMONS

RETIRED
1917-1991

RETIRED
1917-1992

RETIRED
1917-1993

July 16, 2002

HAND DELIVERED

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JUL 17 2002
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Debra Elofson
Executive Secretary
Public Utilities Commission
500 East Capitol Avenue
Pierre, South Dakota 57501

RE: **QWEST 271 FILING**
Docket: TC01-165
Our File: 0053

Dear Debra:

Enclosed for filing are original and ten copies of Midcontinent's Joinder in the QWEST and WWG pricing portions of Staff's Brief. Please file the enclosures.

With a copy of this letter, I am forwarding copies of the enclosure to counsel of record.

Yours truly,

MAY, ADAM, GERDES & THOMPSON LLP

DAVID A. GERDES

DAG:dw

Enclosures

cc: Service List
Tom Simmons

BEFORE THE PUBLIC UTILITIES OF THE COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE ANALYSIS OF QWEST CORPORATION'S COMPLIANCE WITH SECTION 271(c) OF THE TELECOMMUNICATIONS ACT OF 1996	TC01-165	

MIDCONTINENT'S JOINDER IN STAFF'S POSITION ON PUBLIC INTEREST

As a supplement to its post hearing brief, and after having reviewed Staff's post hearing brief, Midcontinent Communications ("Midcontinent") files this joinder in Staff's position on public interest issues, and more specifically as it relates to the Qwest Performance Assurance Plan ("QPAP") and UNE pricing.

In its post hearing brief Midcontinent characterized the QPAP as ". . . the major regulatory component to assure that Qwest does not backslide in its cooperation with its CLECs." This concern with potential backsliding was a major focus of Midcontinent's participation in this docket. Midcontinent agreed with the position taken by Staff that the QPAP should fit the backsliding need of each state, and that South Dakota is best served by a state specific QPAP without a cap. Further, Midcontinent joins Staff's position that UNE prices should be reviewed by the Commission and that Docket TC01-096 should pursue that goal. Therefore, Midcontinent joins those portions of Staff's brief.

Dated this 10th day of July, 2002.

MAY, ADAM, GERDES & THOMPSON LLP

BY:
DAVID A. GERDES
Attorneys for Midcontinent Communications
503 South Pierre Street
P.O. Box 160
Pierre, South Dakota 57501-0160
Telephone: (605)224-8803
Telefax: (605)224-6289

CERTIFICATE OF SERVICE

David A. Gerdes of May, Adam, Gerdes & Thompson LLP hereby certifies that on the 10th day of July, 2002, he mailed by United States mail, first class postage thereon prepaid, a true and correct copy of the foregoing in the above-captioned action to the following at their last known addresses, to-wit:

Colleen Sevold
Manager-Regulatory Affairs
Qwest Corporation
125 South Dakota Avenue, 8th Floor
Sioux Falls, SD 57194

Karen Cremer
Staff Attorney
Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

Thomas J. Welk
Attorney at Law
Boyce, Murphy, McDowell
& Greenfield
P.O. Box 5015
Sioux Falls, SD 57117

Mary S. Hommert
Attorney at Law
Riter, Rogers LLP
101 South Capital Blvd. Suite 1000
Boise, ID 83702-5958

Gregory J. Bernard
Attorney at Law
Morrill, Thomas, Mooney & Diana
P.O. Box 8105
Rapid City, SD 57709-8105

John L. Munn
Attorney at Law
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202

Marlan Best
Staff Analyst
Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

Ted Smith, Attorney at Law
Qwest Corporation
One Main Center Suite 1500
201 South Main Street
Salt Lake City, UT 84111

Steven H. Weigler
Mary B. Tribby
Attorneys at Law
AT&T Comm. of the MidWest, Inc.
1875 Lawrence Street Suite 1574
Denver, CO 80202

Joanne Bagge
Qwest Corporation
1801 California Street Suite 4900
Denver, CO 80202

Marlon "Buster" Griffing PhD
Senior Consultant
QSI Consulting
1735 Crestline Drive
Lincoln, NE 68506

Kathryn J. Fischer
Senior Consultant
QSI Consulting
3113 East Bayaud Avenue Suite 650
Denver, CO 80209-2949

Mark Stacy
QSI Consulting
3500 Meadowbrook Drive
Cheyenne, WY 82009

Lynn A. Stahl
Qwest Corporation
1801 California Street Suite 4900
Denver, CO 80202

David K. Gordon

Qwest
1801 California Street, Suite 4900
Denver, Colorado 80202
Phone 303 672-5823
Facsimile 303 295-7069

John L. Munn
Corporate Counsel

Qwest

July 16, 2002

RECEIVED
JUL 17 2002
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Debra Elofson, Executive Director
SD Public Utilities Commission
500 East Capitol
Pierre, SD 57501

Re: IN THE MATTER OF THE ANALYSIS OF QWEST CORPORATION'S COMPLIANCE WITH SECTION 271(c) OF THE TELECOMMUNICATIONS ACT OF 1996 ---- Docket No. TC01-165

Dear Ms. Elofson:

Enclosed please find an original and ten copies of:

1. Qwest Corporation's Overview Reply Brief;
2. Qwest Corporation's Post- Hearing Reply Brief On Compliance With The 14-Point Competitive Checklist;
3. Qwest Corporation's Reply Brief In Support Of The QPAP;
4. Qwest Corporation's Post-Hearing Reply Brief On General Terms And Conditions, Section 272, And Track A;
5. Qwest Corporation's Post-Hearing Reply Brief On The Public Interest; and
6. Qwest Corporation's Post-Hearing Reply Brief On Change Management.

USA

Also included are the following:

1. Qwest Exhibit 92 Matrix responding to Staff issues
2. Qwest Exhibit 93 The North Dakota QPAP

Thank you for your consideration of this matter.

Sincerely,

John L. Munn

Enclosures
cc: Steven Weigler
David A. Gerdes
Gregory J. Bernard
Colleen Sevold
Tom Welk

END

OF

RETAKE

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE ANALYSIS OF QWEST CORPORATION'S COMPLIANCE WITH SECTION 271 (C) OF THE TELECOMMUNICATIONS ACT OF 1996	))))	DOCKET TC 01-165

QWEST CORPORATION'S OVERVIEW REPLY BRIEF

I.
Introduction

With the submission of Qwest's reply briefs, the procedural schedule for the section 271 analysis in South Dakota is essentially completed.[1] The purpose of this brief is to summarize where the issues raised in the section 271 hearings have been addressed in the briefing, to provide the Commission with an index of Qwest briefing materials submitted herewith, and to address a handful of issues identified in Staff's post-hearing brief as remaining for the Commission's resolution prior to making a section 271 recommendation to the FCC.

In the initial round of post-hearing briefing, Qwest filed nine individual briefs covering the gamut of section 271-related issues for the Commission's consideration in its preparation for making a recommendation to the FCC on Qwest's future application for section 271 approval. In addition to an Overview Brief that outlined the statutory framework for a section 271 analysis, Qwest filed four briefs devoted to substantive issues relating to compliance with the 14-point

[1] One possible exception is whether any party intends to file post-hearing briefing on the issues submitted at the July 11 hearing on the results of the Regional Oversight Committee's (ROC) test of Qwest's Operational Support Systems (OSS). Although none of the parties who attended the hearing appeared inclined to do so, the Commission created a procedural schedule that would permit such filings.

checklist. These briefs addressed checklist issues in groups that were originally formed by the Multi-state Facilitator to ease analysis.[2]

In addition to the briefs addressing checklist compliance, Qwest filed four briefs that discussed other section 271-related issues that had been broken out as separate topics in other regulatory proceedings considering Qwest's section 271 compliance, including the Multi-state process. These included 1) *Qwest Corporation's Opening Post-Hearing Brief on General Terms and Conditions, Section 272, and Track A*; 2) *Qwest Corporation's Post-Hearing Brief In Support of the QPAP*; 3) *Qwest Corporation's Opening Post-Hearing Brief on the Public Interest*, and 4) *Qwest Corporation's Opening Post-Hearing Brief on Performance (PIDs, Retail Performance, and Data Reconciliation)*.

The Commission Staff ("Staff"), Midcontinent Communications ("Midco"), Black Hills FiberCom, LLC ("FiberCom") and AT&T Communications of the Midwest, Inc. ("AT&T") filed post-hearing briefs on July 1, 2002. Staff, Midco and FiberCom each filed a single, integrated brief addressing only those issues it found most significant. For FiberCom those issues appeared to be compliance with the Track A requirements, the adequacy of the Qwest Performance Assurance Plan (QPAP), certain General Terms and Conditions issues, and concerns about what FiberCom characterizes as "secret agreements." Qwest's response to FiberCom on each of these points may be found in its reply briefs listed below by topic. Qwest

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[2] Qwest's opening briefs relating to checklist compliance consisted of the following: 1) *Qwest Corporation's Opening Post-Hearing Brief on Paper Workshop Issues (Checklist Items 3, 7, 8, 9, 10, and 12)*; 2) *Qwest Corporation's Post-Hearing Brief on Workshop 1: Checklist Item 1 (Interconnection, Collocation); Checklist Item 11 (LNP); Checklist Item 13 (Reciprocal Compensation); and Checklist Item 14 (Resale)*; 3) *Qwest Corporation's Opening Post-Hearing Brief on Emerging Services (Line Sharing, Subloop Unbundling, Packet Switching , and Dark Fiber)* and 4) *Qwest Corporation's Opening Post-Hearing Brief on Workshop 3, Group 4 Issues – Unbundled Network Elements Report (Checklist Items 2, 4, 5, and 6)*.

addresses the concerns about the so-called "secret agreements" in its brief on public interest. Similarly, Qwest's responses to Midco's issues relating to unfiled agreements and to an alleged "price squeeze" for certain UNE elements are found in Qwest's reply brief on public interest. Discussion of Midco's checklist and general terms and conditions issues can be found in the reply briefs dedicated to those discrete topics.

Staff's brief focused primarily on the QPAP. Qwest's detailed response to Staff's points is found in *Qwest Corporation's Reply Brief in Support of the QPAP*. With the exception of two issues relating to DSL and line sharing that are addressed in the "emerging services" portion of Qwest's reply brief on checklist compliance[3] the remainder of the checklist-related issues discussed by Staff do not require response from Qwest. However, attached to Staff's brief as Attachment A is a list of thirty-four additional issues that can best be characterized as Staff questions about the origin and modification of specific provisions of Qwest's Statement of Generally Available Terms (SGAT). Qwest responds to each of these issues with the matrix, labeled "Qwest Exhibit 92," attached hereto. Finally, Staff raises an issue in its brief that was not otherwise raised in the testimony or in the exhibits in the record: the need for the Commission to complete Qwest's cost docket (Docket No.TC01-098) prior to making a recommendation to the FCC. Qwest responds to that suggestion and to Staff's observations about the status of the review of the results of the tests of its Operational Support Systems (OSS) in this brief.

Among those filing post-hearing briefs in response to Qwest, only AT&T filed multiple, topic-specific briefs. However, the Commission faces two obstacles in being able to directly

compare AT&T's discussion of the issues with the analysis and response offered by Qwest. First, AT&T did not divide the topics in the same way that the Multi-state Facilitator and Qwest did. And, more importantly, as Qwest's specific responses point out in detail, AT&T seems to have in most cases ignored Qwest's opening briefs and the developing body of state commission opinions on a number of issues. The lack of discussion by AT&T of the actual positions and arguments presented by Qwest in its opening briefs forces Qwest in its replies to reiterate some points and advise the Commission of the irrelevancy of others. Nevertheless, Qwest has responded to the issues raised by AT&T in full. For all issues relating to specific checklist items, the Commission should look to *Qwest Corporations' Post-Hearing Reply Brief on Compliance with the 14-Point Competitive Checklist*. Response to AT&T's arguments on public interest, QPAP and compliance with section 272 can be found in Qwest's reply briefs bearing those titles. Qwest's discussion of the Change Management Process (CMP) can be found in *Qwest Corporation's Verified Comments Regarding the ROC Final OSS Test Reports* filed July 3, 2002, and in *Qwest Corporation's Post-Hearing Reply Brief on Change Management* filed herewith.

II.

Index to Qwest's Reply Briefs

Qwest provides this index to assist the Commission in finding specific topics in Qwest's reply briefs. In addition, each brief contains an complete table of contents.

QWEST CORPORATION'S OVERVIEW REPLY BRIEF

- Contains a discussion of Staff's suggestion that the Commission delay the 271 proceedings pending completion of the cost docket.

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[1] *See Qwest Corporations' Post-Hearing Reply Brief on Compliance with the 14-Point Competitive Checklist* filed concurrently herewith.

- Provides an attachment, "Qwest Exhibit 92", that answers all remaining Staff questions about the origin of and modification to the SGAT language.

QWEST CORPORATION'S POST- HEARING REPLY BRIEF ON COMPLIANCE WITH THE 14-POINT COMPETITIVE CHECKLIST

- Discusses all checklist issues raised in the briefs of the intervenors.

QWEST CORPORATION'S REPLY BRIEF IN SUPPORT OF THE QPAP

- A copy of the North Dakota QPAP is attached as "Qwest Exhibit 93"

QWEST CORPORATION'S POST-HEARING REPLY BRIEF ON GENERAL TERMS AND CONDITIONS, SECTION 272, AND TRACK A

QWEST CORPORATION'S POST-HEARING REPLY BRIEF ON THE PUBLIC INTEREST

- Contains discussions of the "unfiled agreements" and UNE "price-squeeze" issues

QWEST CORPORATION'S POST-HEARING REPLY BRIEF ON CHANGE MANAGEMENT

III.

Overview Perspective: The Case is Fully Submitted

As noted above, with the submission of these reply briefs and, possibly, post-hearing briefing on the OSS test results and Change Management Process (CMP), the record for the Commission's analysis of Qwest's compliance with section 271 is complete. Although Staff identified a small number of issues that it believes remain for consideration before the Commission can make an FCC recommendation, as Qwest discusses below, none of these raise any impediment to the Commission's final determination.

A. Staff's Remaining SGAT Issues Have Been Answered.

At page 5 of its brief, Staff states that, although Qwest generally either agreed to make Staff-recommended changes to its SGAT or offered suitable compromises in the hearing, "there are a few important changes that were not referenced" in Qwest's post-hearing briefs. Staff then identifies two issues: the agreement to provide DSL where the CLEC offers the underlying voice

service, and line sharing provisioning intervals. Both of these items are discussed in *Qwest Corporation's Post-Hearing Reply Brief on Compliance with the 14-Point Competitive Checklist* under the discussion of emerging services. Qwest believes its position on these points is fully compliant with Staff's understanding of their resolution.

In addition to the concern about those two issues, Staff also states that its recommendation that Qwest complies with the competitive checklist is "qualified" pending its review of Qwest's response to concerns listed on Attachment A to the Staff Brief. Attached hereto is a matrix, labeled "Qwest Exhibit 92", that provides a response to each of Staff's thirty-four issues listed on Attachment A. With the submission of this matrix Qwest has responded fully to each question raised by Staff in these proceedings concerning the origin and modification of the language contained in its SGAT. Qwest believes that the record unquestionably demonstrates that its current South Dakota SGAT contains the language agreed to by Qwest in the Multi-state Proceeding and in subsequent proceedings where language was crafted for use across Qwest's region. It also contains the language Qwest committed to provide in its testimony in this case.[4]

B. The Commission Has Reviewed the OSS Testing Results and Change Management Process

Staff notes in its brief that the OSS final report and the CMP must be reviewed before the Commission can make a recommendation regarding the 14-point checklist. Following the hearing conducted on July 11, 2002, at which the Commission took testimony and admitted

[4] As Qwest has advised the Commission, however, the SGAT continues to evolve and Qwest will make additional changes to the SGAT to reflect new consensus and to reflect the directions of this Commission contained in its written decision(s).

numerous exhibits, including the OSS final report (Qwest Exhibit 87), the record is complete on this topic.[5]

C. The Commission Should Reject Staff's Suggestion that it Withhold Its Section 271 Recommendation Until the Cost Docket is Completed.

Staff's brief at page 40 recommends that the Commission "withhold any recommendation regarding Qwest's Section 271 compliance pending the resolution of Docket TC01-098." No testimony has been provided on this point by any party and this reply provides Qwest's only opportunity to respond to what amounts to a major shift in position of the Commission Staff.

While cost dockets bear an important relationship to 271 dockets, state commissions and the FCC have been careful not to treat them as the same, nor to make them dependent on each other. The D.C. Circuit court and the FCC (on several occasions) have expressly concluded that 271 approval should be granted even when significant cost activity is pending, so long as the record demonstrates that the BOC has complied with the requirements of section 271 (most notably the 14-point checklist). They have correctly recognized that because telecommunications technology, market conditions and regulatory policies are highly dynamic, the process of establishing UNE rates is necessarily iterative in nature. If, as in South Dakota, the state commission is committed to applying TELRIC principles in current and future cost proceedings, the court and the FCC will accept existing rates as TELRIC-compliant if they meet basic standards, even if the commission is in the process of a new docket to revisit the rate levels. The Commission, primarily in the AT&T arbitration[6] has set a variety of TELRIC-based UNE prices that will meet the FCC's pricing standards. The suggestion that the Commission link the

[5] One possible exception to this is whether any party intends to file post-hearing briefing on the issues submitted at the July 11 hearing. Although none of the parties who attended the

and 271 dockets is inconsistent with the body of law that has been developed by the courts and by the FCC. Just as importantly, the suggestion is an unnecessary limitation on the flexibility of the Commission to act in the public interest.

1. A State Commission's Primary Function in a Section 271 Proceeding is to Consult with the FCC in the FCC's Process of Determining Checklist Compliance.

The role of state commissions in the section 271 process is quite different from their usual role in typical state regulatory proceedings. State commissions play a critical role in consulting with the FCC[7] and providing information and advice that the FCC, the ultimate decision maker, can rely on in making its decision. Because the FCC is the decision maker in this process, a state commission should perform its consultative role by carefully examining how the FCC and the courts have interpreted the requirements of section 271 on a range of issues, including the standards relating to TELRIC pricing.[8]

State commissions also play an important role in establishing rates for interconnection and UNEs "on rates, terms, and conditions that are just, reasonable and

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hearing appeared inclined to do so, the Commission has created a procedural schedule that would permit such filings.

[6] *In the Matter of the Interconnection Contract Negotiations Between AT&T Communications of the Midwest, Inc. and U S WEST Communications, Inc. Pursuant to 47 U.S.C. 251* (Docket No. TC96-184) ("AT&T arbitration").

[7] 47 U.S.C. § 271(d)(2)(B). To fulfill this consultative role, the South Dakota Commission has received voluminous testimony and exhibits and conducted an expansive hearing to review the checklist and other 271-related items in detail. The South Dakota Commission is also part of the 13-state collaborative OSS testing effort and conducted a separate hearing on that aspect of section 271 compliance.

[8] The importance of following the FCC's interpretation of section 271 requirements was emphasized by John Antonuk, the Multi-state Facilitator: "It is difficult to see what is to be gained by placing Qwest under a standard that varies significantly from the one being routinely applied by the FCC. Whether the standard is to our personal liking or not is not the issue; what is material is that Qwest meets the law and precedent established by the FCC." Facilitator's Public Interest Report, October 26, 2001,(Qwest Exhibit 27) at 8.

nondiscriminatory."[9] While this important function bears an obvious relationship to section 271 proceedings, it is separate and distinct from the 271 process. State commissions have been careful not to treat 271 proceedings and cost dockets as the same, nor to make them dependent on each other.

2. Neither Section 271 nor the FCC Require That All Cost Dockets be Completed Before Allowing Long Distance Re-entry and State Commissions have Consistently Recommended 271 Approval Even Though Significant Cost Dockets Were Pending.

To date, the FCC has approved 271 applications in fifteen states: New York[10]; Texas[11]; Kansas/Oklahoma[12]; Massachusetts[13]; Connecticut[14]; Pennsylvania[15]; Arkansas/Missouri;[16] Rhode Island;[17] Vermont[18]; Maine[19]; Georgia/Louisiana[20] and New Jersey[21]. It approved the 271

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[9] 47 U.S.C. §§ 251(c)(2)(D) and (c)(3).

[10] *Application of Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in New York,* 15 FCC Rcd 75 (1999), ¶ 20 (*"New York Order"*), *aff'd sub nom AT&T Corp. v. FCC 220 F.3d 607* (D.C. Cir. 2000).

[11] *Application of SBC Communications Inc., et al. to Provide In-Region, Inter-LATA Services in Texas,* 15 FCC Rcd 18354 (2000) (*"Texas Order"*).

[12] *Application of SBC Communications Inc., et al for Provision of In-Region, InterLATA Services in Kansas and Oklahoma,* 16 FCC Rcd 6237(2001) (*"Kansas/Oklahoma Order"*) *aff'd in part and remanded in part sub nom Sprint Communications v. FCC, 274 F.3d 549* (D.C. Cir., 2001)

[13] *Application of Verizon New England Inc., et al., to Provide In-Region, InterLATA Service in Massachusetts,* 16 FCC Rcd 8988(2001) (*"Massachusetts Order"*).

[14] *Application of Verizon New York, Inc., et al., for Authorization to Provide In-Region, InterLATA Service in Connecticut,* 16 Rcd 14147 (2001) (*"Connecticut Order"*).

[15] *Application of Verizon Pennsylvania, Inc., et al., for Authorization to Provide In-Region, InterLATA Service in Pennsylvania,* 16 FCC Rcd 17419 (2001) (*"Pennsylvania Order"*).

[16] *Application of SBC Communications Inc., et al., to Provide In-Region, Inter-LATA Services in Arkansas and Missouri,* 16 FCC Rcd 20719 (2001) (*"Arkansas/Missouri Order"*).

[17] *Application by Verizon New England, Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Rhode Island,* 17 FCC Rcd 3300 (2002) (*"Rhode Island Order"*).

[18] *Application by Verizon New England Inc., et al., for Authorization To Provide In-Region, InterLATA Services in Vermont,* Memorandum Opinion and Order, CC Docket No. 02-7 (rel. April 17, 2002), FCC 02-118, 67 Fed. Reg. 20771 (2002) (*"Vermont Order"*).

applications with a recommendation from the state commission in each state that relief be granted. In these decisions, the FCC addressed a variety of arguments advanced by CLECs and others that approval should be delayed. One such argument has been the claim that 271 approval should be delayed because—like the current situation in South Dakota—some wholesale cost and pricing decisions were still pending before the state commission. Notwithstanding, the state commission in each case had recommended final 271 approval. To its credit and to the benefit of consumers in these states, the FCC has consistently rejected the arguments for delay.

The FCC and the D.C. Circuit have been clear on this point: Section 271 does not require that all pending cost dockets be completed before a BOC is granted authorization to provide long distance services. In eight of the states that have received section 271 approval, the issue of the impact of ongoing cost proceedings on 271 compliance was directly addressed by the FCC and found not to stand in the way of granting 271 approval. In another state, Arkansas, the Commission had not even conducted any proceeding to determine whether the rates were TELRIC-compliant, yet the FCC still granted 271 approval.

The following summarizes the situations in those nine seven states:

New York. The FCC approved Bell Atlantic's 271 application in New York in December 1999, the first such approval. AT&T appealed that decision to federal court. The

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[29] *Application by Verizon New England Inc., et al., for Authorization to Provide In-Region, InterLATA Services In Maine*, CC Docket No. 02-61, Memorandum Opinion and Order, FCC 02-187 (June 19, 2002 ("*Maine Order*").

[30] *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services In Georgia and Louisiana*, CC Docket 02-35, Memorandum Opinion and Order, FCC 02-147 (May 15, 2002) ("*Georgia/Louisiana Order*").

[31] *Application by Verizon New Jersey Inc. et al., for Authorization to Provide In-Region, InterLATA Services in New Jersey*, WC Docket No. 02-67, Memorandum Opinion and Order, FCC 02-189 (June 24, 2002) ("*New Jersey Order*").

decision in that appeal, *AT&T Corp. v. FCC*, 220 F.3d 607 (D.C. Cir. 2000), is a leading case on 271 issues. AT&T claimed that the FCC erred in concluding that the wholesale switching rates that had been set in 1997 met TELRIC standards, given the existence of significant changes in technology and in vendor prices.[22] The New York Commission acknowledged that potentially rate-affecting changes had taken place, but declined to make a selective modification, instead opting for "a comprehensive review of switching costs" to be conducted after the completion of the 271 proceeding.[23] The court agreed with the FCC's conclusion that "the prospect of future modification" does not make current rates less than TELRIC-compliant:

> The FCC's decision seems reasonable to us. Not only are the state-agency-approved rates always subject to refinement, but we suspect that rates may often need adjustment to reflect newly discovered information . . . . If new information automatically required rejection of section 271 applications, we cannot imagine how such applications could ever be approved in this context of rapid regulatory and technological change.[24]

The court upheld the FCC's decision to allow Verizon into the long distance market in New York, despite the fact that there were unresolved wholesale cost and pricing issues relating to switching costs.[25] Although the existing switching rates had been established in 1997 and all parties acknowledged they would likely change in the future as a result of the comprehensive

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[22] *Id.* at 616-17.

[23] *Id.* at 617.

[24] *Id.* The court also said that, given "the rapid technological and competitive change" which engenders "new technological challenges and unsettled legal disputes," the 271 process "must have some play in its joints." *Id.* at 616 (quoting the FCC's brief).

[25] In the *New York Order*, the FCC recognized that the New York Commission was addressing these costs in an ongoing basis: "AT&T has presented no evidence that the New York Commission's 'ongoing examination of the [switch discount] issue betokens a failure to set TELRIC-compliant rates,' nor does it refute the New York Commission's claim that these rates may be refined in the future, 'but they are no less TELRIC-compliant on that account.'" *New York Order*, ¶ 247 (quoting the New York Commission).

review of rates in New York, the FCC concluded that the rates had been established in accordance with TELRIC and found them reasonable for section 271 purposes.

Texas. In the Texas case, non-recurring rates were the subject of an ongoing cost docket that was unresolved at the time the Texas Commission recommended to the FCC that SWBT was 271 compliant: "The Texas Commission has established a schedule to set permanent rates for all nonrecurring charges, and has indicated to the parties that the interim rates are subject to a true-up."[26] Likewise, another CLEC complained that SWBT had not set final, TELRIC-based rates for installation and conditioning of xDSL-capable loops even though the Texas Commission was conducting a proceeding to set permanent rates.[27] Despite these gaps in permanent rates, the FCC nevertheless approved the 271 application, noting that the Texas commission had demonstrated a commitment to TELRIC:

> Because we are confident that the Texas Commission will reach an appropriate result consistent with our rules, we conclude that SWBT has met its obligations under this checklist item. We also observe that in any context in which prices are not set in accordance with our rules and the Act, we retain the ability to take a variety of enforcement actions and will not hesitate to do so.[28]

Massachusetts. In Massachusetts, the commission established UNE rates in a case that grew out of several 1996 CLEC arbitration requests. The rates were initially interim, but were made permanent in 1999. Between then and the time that Verizon filed its 271 application, some Massachusetts UNE rates were changed and Verizon adopted New York rates for some UNEs as part of its 271 application. In the meantime, the commission opened a scheduled five-year review of its UNE rates in January 2001, which it intended to complete by the end of 2001.

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[26] *Texas Order*, ¶ 238.
[27] *Id.*, ¶ 240.
[28] *Id.*, ¶ 239.

Nevertheless, the commission recommended that the FCC approve the Verizon 271 application on the basis of the existing UNE rates.[29] Despite the fact that a full-scale review of all UNEs was ongoing, the FCC approved the 271 application, noting that "the section 271 process simply could not function as Congress intended if we resolved all [disputes over an incumbent LEC's precise obligations to its competitors] as a precondition to granting a section 271 application."[30] Moreover, the FCC concluded that switching rates fall within a reasonable range, "although we recognize that rates may need to evolve over time to take into account updated information on cost inputs and new technologies."[31] Finally, the FCC stated:

> We find the concerns of the commenters regarding the pending UNE cost proceeding before the Massachusetts Department to be unwarranted. As discussed above, the fact that a state may conduct a rate investigation and change the rates in the future does not cause the applicant to fail the checklist item at this time. Indeed, rates may evolve over time to reflect new information on cost inputs and changes in technology or market conditions. . . . The Massachusetts Department has committed to conclude its proceeding and implement new UNE rates before the end of this calendar year.[32]

The FCC decision granting 271 approval in Massachusetts was entered on April 16, 2001, nearly nine months before the comprehensive UNE cost docket was scheduled to be completed.[33]

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[29] *Massachusetts Order*, ¶¶ 18-19.

[30] *Id.*, ¶ 10.

[31] *Id.*, ¶ 27.

[32] *Id.*, ¶ 36.

[33] In February 2001, the Massachusetts Commission (the Massachusetts Department of Telecommunications and Energy) recommended 271 approval in Massachusetts, at the same time acknowledging that its ongoing UNE investigation would not be completed until December 2001. Evaluation of the Massachusetts Department of Telecommunications and Energy, CC Docket No. 01-09, February 6, 2001, at 22 ("[T]he Department recently opened an investigation into VZ-MA's rates and its wholesale discounts for resale. This investigation is the scheduled

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interim order relating to some of the additional UNEs required by the FCC's UNE remand decision.[34] The Commission was also conducting a comprehensive UNE rate proceeding that began in September 2000, but which was not scheduled to be completed until April 30, 2002.[35] As in New York, Texas, and Massachusetts, the FCC analyzed the existing UNE rates, found that they followed basic TELRIC principles,[36] and concluded that the resulting rates fell "within the range that TELRIC-based ratemaking would produce."[37] Thus, despite the fact that the ultimate resolution of the comprehensive UNE pricing case would not be known for over seven months,[38] the FCC granted 271 approval in September 2001:

> Because we find the rates currently in effect fall within the range that TELRIC-based ratemaking would produce, we find the concerns of WorldCom regarding a potential delay to the pending UNE cost proceeding before the Pennsylvania Commission to be unwarranted.[39]

At the same time, the FCC noted the positive benefits to Pennsylvania consumers from BOC entry into the long distance business:

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five-year review of VZ-MA's UNE and resale rates. The Department intends to have new rates in effect by December of this year.")

[34] *Pennsylvania Order*, ¶¶ 53-54.

[35] *Id.*, ¶ 69.

[36] The Pennsylvania Commission found the rates TELRIC-compliant even though some of them had been set on the basis of the TSLRIC costing methodology: "We are unconcerned with labels and general characterizations of the approach a state commission uses in setting rates." *Id.*, ¶ 56.

[37] *Id.*, ¶ 69; see also Pennsylvania Commission's general discussion of UNE rates, *id.*, ¶¶ 55-72.

[38] In its recommendation to the FCC, the Pennsylvania Commission specifically addressed the fact that cost activity was ongoing and concluded that future compliance filings "will yield TELRIC-based rates using the appropriate cost input factors." Consultative Report of the Pennsylvania Public Utility Commission, CC Docket No. 01-138, June 25, 2001, at 61. The Commission also concluded that "the Pennsylvania local telephone markets are irreversibly open to competition" and that allowing Verizon into the long distance market would "provide additional public benefits by giving Pennsylvania customers greater choice in that market as well." *Id.* at 4.

[39] *Pennsylvania Order*, ¶ 69.

> From our extensive review of the competitive checklist, which embodies the critical elements of market entry under the Act, we find the barriers to competitive entry in the local exchange markets have been removed and the local exchange markets today are open to competition. We further find that the record confirms our view, as noted in prior section 271 orders, that BOC entry into the long distance market is open to competition consistent with the competitive checklist.[40]

The FCC thus reaffirmed its view that checklist compliance is the critical factor and that state commissions should not erect new barriers to long distance reentry that do not otherwise exist.

Missouri. In Missouri, initial UNE rates were established in a 1997 arbitration proceeding. In 1998, the Missouri Commission adopted some additional UNE rates. Then in 2001, the Missouri Commission adopted 95 additional UNEs from the Texas interconnection agreement on an interim basis, subject to true-up. SWBT also reduced some additional UNE rates as part of its 271 filing.[41] The FCC found the rates, some of which were based on Texas rates, to be TELRIC-compliant.[42] One CLEC claimed that several Missouri UNE rates were set several years ago and declining cost had made them "out-of-date" and non-compliant. The FCC rejected that claim:

> [T]he Missouri Commission has demonstrated its commitment to TELRIC, and is in the process of reexamining a number of rates in ongoing rate cases. Rate-making is a complex endeavor, and it is common for state rate cases to last many months. We are confident that the Missouri Commission will make any future rate modifications in compliance with our TELRIC standard.[43]

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[40] *Id.*, ¶ 125.

[41] *Arkansas/Missouri Order*, ¶ 49.

[42] *Id.*, ¶¶ 53-66. The FCC concluded that if a state commission fails to follow TELRIC or does so improperly, "we will look to rates in other section 271-approved states to see if rates nonetheless fall within the range that a reasonable TELRIC-based ratemaking would produce." *Id.*, ¶ 56.

[43] *Id.*, ¶ 62. In support of this conclusion, the FCC cited the *AT&T* case for the proposition that "[i]f new information automatically required rejection of section 271 applications, we cannot imagine how such applications could ever be approved in this context of rapid regulatory and technological change." 220 F.3d at 617. The Missouri Commission acknowledged that ongoing cost docket activity had not been completed and stated its

Thus, like many other cases before it, the FCC found that the existence of ongoing wholesale pricing activity was not inconsistent with a grant of 271 approval.

Arkansas. The Arkansas Commission conducted two price arbitrations in 1996 that were affirmed in 1997. However, in 1998 the Arkansas Commission reversed itself, concluding that state statutes restricted its ability to establish UNE rates. Thereafter, the BOC in Arkansas adopted rates from some of its other states and in early 2001, after the FCC granted 271 approval in Kansas, modified its prices to mirror its Kansas UNE rates. On the basis of these rates, the Arkansas Commission concluded that these rates met the checklist.[44] Thus, the rates before the FCC in the Arkansas 271 proceeding had not been established, or even considered, in a cost docket or arbitration proceeding before the Arkansas Commission.[45] In granting the 271 application in Arkansas, the FCC found that its USF cost model generally indicated that Arkansas loop costs were more than 20 percent higher than corresponding Kansas rates.[46]

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commitment to future TELRIC compliance. Written Consultation of the Missouri Public Service Commission, CC Docket No. 01-194, September 7, 2001, at 9-10.

[44] *Arkansas/Missouri Order*, ¶¶ 50-51.

[45] The Arkansas Commission, in its May 2001 Consultation Report, readily acknowledged that the UNE prices it was basing its recommendation on were set by the Kansas Commission not by the Arkansas Commission. Nevertheless, citing geographic similarities between the two states, the fact that both states are served by the same BOC, and the similarity of their rates structures, the Commission concluded "that the UNE prices in the proposed A2A are within the parameters of the TELRIC methodology as applied." Second Consultation Report of the Arkansas Public Service Commission to the Federal Communications Commission Pursuant to 47 U.S.C. Section 271(d)(2)(B), Docket No. 00-211-U, May 21, 2001, at 8. The FCC accepted the rates as TELRIC compliant.

[46] *Arkansas/Missouri Order*, ¶ 67.

Because the Kansas rates upon which the Arkansas rates were based were TELRIC-compliant, the FCC held that Arkansas rates were TELRIC-compliant and that 271 approval should be granted.[47]

Rhode Island. The Rhode Island Commission completed a TELRIC-based UNE pricing proceeding with an order issued on April 11, 2001. Verizon subsequently implemented further UNE rate reductions on two occasions. The FCC noted that, in its April 11, 2001 order, "[t]he Rhode Island Commission also ordered Verizon to file new cost studies using certain specific assumptions as part of a new UNE rate proceeding which is scheduled to begin no later than May 1, 2002, and in which the Rhode Island Commission expects to adopt new UNE rates by the end of 2002. The Rhode Island Commission has indicated that it required these new cost studies because it 'wanted to receive and review more recent evidence.' "[48] In response to CLEC arguments "that Verizon's UNE rates are not TELRIC compliant because the Rhode Island Commission will soon begin a new rate proceeding in which it will reconsider certain assumptions underlying the rates,"[49] the FCC responded as follows:

> The fact that the Rhode Island Commission has scheduled a rate proceeding to update existing rates does not, in itself, prove that existing rates are not TELRIC compliant. Indeed, the Commission has recognized that rates may well evolve over time to reflect new information on cost study assumptions and changes in technology, engineering practices, or market conditions. The United States Court of Appeals for the D. C. Circuit agrees:
>
> [W]e suspect that rates may often need adjustment to reflect newly discovered information, like that about Bell Atlantic's future discounts. If new information automatically required rejection of section 271 applications, we cannot imagine how such applications

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[47] *Id.*, ¶¶ 67-68.
[48] *Rhode Island Order*, ¶ 31.
[49] *Id.*

> could ever be approved in this context of rapid regulatory and technological change.[50]

Vermont. In the Vermont section 271 proceeding, AT&T and WorldCom argued that certain UNE rates in place in the state were based on data that were several years old, and were therefore not TELRIC complaint.[51] The FCC squarely rejected this contention. Notwithstanding the age of the data and the fact that the state regulator was then "considering [a] recommendation for a triennial review of UNE rates, which, if adopted, would result in a new rate proceeding early next year," the Commission found that the rates in place were TELRIC-compliant.[52] The FCC noted that Vermont "is a small state with limited resources" that "cannot be expected to undertake a continuous cycle of resource-intensive, full-blown rate proceedings. . .."[53] In other words, the FCC squarely held that it was not necessary for the Vermont Board to conduct a new cost proceeding as a prerequisite for 271 approval.

Georgia. The FCC approved BellSouth's Georgia 271 application despite its recognition of the fact that a pricing docket was pending at the time.[54] The FCC held,

> In this case, we do not believe that the existence of a new Georgia cost docket, without more, should affect our review of the currently effective rates submitted with BellSouth's section 271 application. States review their rates periodically to reflect changes in costs and technology. As a legal matter, we see nothing in the Act that requires us to consider only section 271 applications containing rates approved within a specific period of time before the filing of the application itself. Such a requirement would likely limit the ability of incumbent LECs to file their section 271 applications to specific windows of opportunity immediately after state commissions have approved new rates to ensure approval before the costs of inputs have changed. We doubt that Congress, which directed us to complete our section 271 review process within 90 days, intended to burden the incumbent LECs, the states, or the Commission with the additional delays and uncertainties that would result from such requirement.[55]

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[50] *Id.* (citing *AT&T Corp. v. FCC*, 22 F.3d 607, 617-18 (D.C. Cir. 2000)).
[51] *Vermont Order* at ¶¶ 21-22.
[52] *Id.* at ¶ 23.
[53] *Id.* at ¶ 24.
[54] *Georgia/Louisiana Order* at ¶ 31.
[55] *Id.* at ¶ 96.

Summary. The conclusions that can be drawn from these cases are unmistakable:

1. Notwithstanding the need to begin or complete further proceedings on costs, state commissions have strongly supported 271 approval when they are convinced that the checklist items have been met by the applicant.

2. To be TELRIC-compliant, the rates established by state commissions need not be the most current possible rates nor do they need to be perfect. The U.S. Court of Appeals for the D. C. Circuit has upheld the FCC's conclusion that "[t]o create a distinction between properly derived cost-based rates and the rates that were equal to them . . . 'would promote form over substance, which, given the necessarily imprecise nature of setting TELRIC-based pricing, is wholly unnecessary.'"[56] The FCC recognizes that the setting of wholesale UNE rates is an iterative process; therefore, there is no need to wait for a perfect set of rates, so long as the existing rates are generally compliant with TELRIC and the state commission is committed to appropriate application of TELRIC principles in ongoing or future cost proceedings.

3. Assuming the BOC is in compliance with the checklist, the benefits of long distance reentry to consumers are real and tangible and should not be withheld from consumers because cost proceedings have not been completed. The FCC has viable tools to assure ongoing compliance after future cost decisions are made.

3. The Existing South Dakota UNE Rates are TELRIC-Compliant.

This Commission's orders in the AT&T arbitration are TELRIC-compliant and will serve as an appropriate basis for a South Dakota 271 application. The Commission applied TELRIC principles and has shown an ongoing commitment to follow those principles in current and future

cost dockets.[57] Therefore, there is simply no reason for the South Dakota Commission to address these issues any differently than the state commissions of the other states for which the FCC has approved 271 applications.

In its decisions on 271 applications, the FCC has carefully balanced the two concepts that underlie section 271: (1) Compliance with the requirements of section 271 should be rigorously enforced to assure the market is open to competition; and (2) once 271 compliance is achieved, immediate reentry by the BOC into long distance should be allowed because it serves the public interest. Applying these principles to this case, the Commission should continue to be vigorous in assuring that a record of checklist compliance has been established. Likewise, it is entirely appropriate for the Commission to engage in an in-depth, forward-looking review of wholesale costs and rates in its cost docket. But the Commission should, like regulators in the other 271 states, leave itself the flexibility of recommending 271 approval for Qwest in South Dakota once it is reasonably assured that Qwest is in compliance. The Staff suggestion that it link the cost and 271 dockets inappropriately limits the Commission's ability to make a recommendation at the time it makes sense for South Dakota consumers. That suggestion should be rejected.

4. Qwest's Voluntary UNE Rate Reductions Will Further Insure that the Public Interest Does Not Require this Commission to Delay its 271 Recommendation

In two states for which 271 applications have now been filed with the FCC, Idaho and North Dakota, Qwest faced circumstances similar to those that pertain here with regard to the

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[56] *Sprint Communications v. FCC*, slip op. at 11, quoting *Kansas/Oklahoma Order*, ¶ 87 (slip op. available at http://www.fcc.gov/ogc/documents/opinions/2001/01-1076.pdf)

[57] Through its request that Qwest file its most recent TELRIC cost studies in the cost docket, a task that was completed last month, and its approval of the Staff's recommended consultants to assist in the analysis, the Commission has demonstrated a clear intention to apply TELRIC principles.

existing UNE rates. As in South Dakota, in those states the commissions had not addressed UNE rates[58] outside arbitration cases completed several years prior to the FCC filing. To remove any doubt that the rates contained in the SGAT price lists for those states were TELRIC-complaint, Qwest voluntarily reduced certain of its key UNE rates to a level consistent with the rates established by the Colorado commission, which has recently concluded a comprehensive cost docket. The UNE elements affected by these price reductions were those that make up the UNE Platform, including the local loop rates. In the case of the loop rate, for example, the Colorado price was adjusted by state-specific cost differences established by the FCC's Synthesis Model.

Qwest is prepared to make similar voluntary rate reductions for South Dakota and will file a revised version of its South Dakota SGAT, Exhibit A, setting out these rate changes. This filing will take place shortly before Qwest files its FCC application for South Dakota and will contain any other SGAT changes that are required to bring the South Dakota SGAT into compliance with the Commission's final decision in this case. Qwest will seek the Commission's acknowledgement that these unilaterally reduced rates are effective on the date indicated in that filing. These reduced rates will be available to CLECs prior to the filing of Qwest's South Dakota application at the FCC. Other than the unilaterally reduced rates, Qwest's revised Exhibit A will not change the other rates currently available in South Dakota. No rates will be increased. Qwest strongly believes that the UNE rates submitted on the revised Exhibit A will be deemed by the FCC to fall within the range of reasonable results produced by TELRIC-based price setting.

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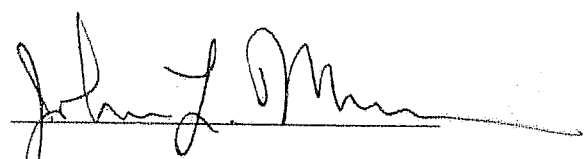
[58] This Commission has, of course, deaveraged its existing TELRIC rates. *In the Matter of Establishment of Different Rates for Interconnection and Unbundled Network Elements In at Least Three Geographic Areas for Nonrural Telecommunications Companies*, Docket No. TC 99-106 (May 1, 2000).

Qwest emphasizes that nothing about these changes -- which will remain in effect until completion of the South Dakota cost docket -- alters or undermines the Commission's authority to set UNE rates. Qwest is committed to working with Staff, and the Commission, in concluding the pending cost docket in a reasonable and efficient manner following receipt of the FCC decision on Qwest's South Dakota 271 application.

While Qwest looks forward to concluding the South Dakota cost docket, the rate reductions it commits to make here will provide South Dakota CLECs with more immediate price reductions without undermining the Commission's recognized authority to set different prices in its own cost docket. This Qwest commitment insures that CLECs receive rate reductions sooner than they would if the Commission adopted the Staff's recommendation that 271 docket be delayed until the completion of the cost docket. It also assures that South Dakota customers will enjoy the benefits of increased competition that will flow from Qwest's re-entry into the interLATA market.

Dated this 16th day of July, 2002.

Respectfully submitted,



John L. Munn
Qwest Corporation
1801 California Street, Suite 4900
Denver, Colorado 80202
(303) 672-5823

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
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SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE ANALYSIS OF QWEST CORPORATION'S COMPLIANCE WITH SECTION 271 (C) OF THE TELECOMMUNICATIONS ACT OF 1996	))))	DOCKET TC 01-165

QWEST CORPORATION'S POST- HEARING REPLY BRIEF ON COMPLIANCE WITH THE 14-POINT COMPETITIVE CHECKLIST

July 16, 2002

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I. INTRODUCTION

Qwest's compliance with the 14-point competitive checklist was fully addressed in Qwest's pre-hearing briefs and stands largely unrefuted. Qwest incorporates its prior briefing herein and responds to the few checklist compliance issues raised by the CLECs. Furthermore, Qwest previously filed a Brief that demonstrates that it is providing each checklist item at a level of quality consistent with the Act. Qwest also presented information and results regarding its actual performance and the data reconciliation process that has independently validated the performance results. No party responded to or challenged those results, which demonstrate that Qwest's commercial performance meets all requirements of the Act. Accordingly, based upon the testimony, exhibits and briefing Qwest has submitted, the Commission should therefore find that Qwest is fully compliant with all aspects of the competitive checklist.

II. DISCUSSION

A. Qwest Satisfies All Requirements Relating To Checklist Item 1 (Interconnection).

The CLECs that are actually operating in the South Dakota local exchange market have not expressed any concerns about Qwest's practices and SGAT language relating to interconnection. Only AT&T, which has never attempted to interconnect with Qwest in South Dakota, raises issues relating to this portion of Checklist Item 1, and each of its purported concerns is unfounded. Qwest has already responded to AT&T in its discussion of interconnection in its opening brief and, therefore, only briefly addresses AT&T's interconnection issues in the discussion that follows.

1. Entrance Facilities (SGAT § 7.1.2.1)

AT&T offers three fundamentally inaccurate criticisms of SGAT § 7.1.2.1 and Qwest's use of entrance facilities for interconnection.

First, AT&T asserts that Qwest does not permit a CLEC to obtain dedicated trunks to a point of interconnection ("POI") selected by the CLEC.[1] To the contrary, Qwest has routinely provided CLECs with dedicated trunking to CLEC-selected POIs both inside and outside Qwest central office buildings. A CLEC may choose a POI anywhere in Qwest's incumbent LEC territory.[2] As Qwest explained in its opening brief, when a CLEC has selected a POI in a *non-Qwest* building, Qwest has routinely arranged a dedicated interconnection trunk group from one or more Qwest switches to that POI.[3] This Qwest-provided transport is an "entrance facility," and it often provides a path for direct trunk groups.

Second, AT&T argues incorrectly that the effect of Qwest's entrance facility offering is to require the CLEC's POI to be located on the CLEC's network, not on Qwest's network.[4] In fact, the POI is located on both carriers' networks, since it marks the edges of *both* carriers' local interconnection networks and is at the juncture of each. AT&T is simply wrong in suggesting

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[1] AT&T's Brief Regarding Qwest's Interconnection Obligations ("AT&T Interconnection Brief") at 7.

[2] *See* KMC interconnection agreement at 7.1.2, attached as Ex. LBB–GTC–1 to Rebuttal Testimony of Larry B. Brotherson re: General Terms and Conditions, filed on April 2, 2002 (Qwest Ex. 36) ("Brotherson Rebuttal re: General Terms and Conditions"); *see also* SGAT § 7.1.2 (Qwest Ex. 21).

[3] Qwest Corporation's Post-Hearing Brief on Workshop 1: Checklist Item 1 (Interconnection, Collocation); Checklist Item 11 (LNP); Checklist Item 13 (Reciprocal Compensation); and Checklist Item 14 (Resale) ("Qwest Brief on Checklist Items 1, 11, 13 & 14") at 14.

[4] AT&T Interconnection Brief at 8.

that the SGAT or the KMC interconnection agreement requires a CLEC to locate its POI at the CLEC's switch or somewhere on the CLEC's network.[5]

Third, AT&T criticizes Qwest for charging DS-1 and DS-3 loop rates for entrance facilities. However, most Qwest interconnection agreements[6] and section 251(b)(5) itself state that carriers will compensate one another for the transport that they provide on their side of the POI in order to complete terminating local calls. The KMC agreement and the SGAT state clearly that transport costs on either side of the point of interface are subject to reciprocal compensation.[7]

In sum, as explained in its opening brief, Qwest has complied with the Facilitator's recommendation by changing the SGAT to permit entrance facilities to be used for access to UNEs.[8] Consistent with Dr. Griffing's recommendation, the Commission should accept this resolution.[9]

2. Transport In Excess Of 50 Miles (SGAT § 7.2.2.1.5)

AT&T's argument relating to SGAT § 7.2.2.1.5 rests on a plainly distorted interpretation of this provision. AT&T asserts that the provision will "arbitrarily limit the DTT [Qwest] will

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[5] Qwest Brief on Checklist Items 1, 11, 13 & 14, at 14.

[6] See, e.g., KMC interconnection agreement § 7.1.2, attached as Ex. LBB–GTC–1 to Brotherson Rebuttal re: General Terms and Conditions (Qwest Ex. 56) or SGAT (Qwest Ex. 21) § 7.3.1.1.3.

[7] Qwest Brief on Checklist Items 1, 11, 13 & 14, at 15.

[8] Qwest changed a prohibition to permission at SGAT §§ 7.1.2.1 and 7.1.2.3 (Qwest Ex. 21).

[9] Griffing Direct (Staff Ex. 1) at 24.

construct to 50 miles while the CLEC must construct the remainder."[10] As shown by the following language taken directly from the SGAT, that is not what § 7.2.2.1.5 says:

> If direct trunked transport is greater than fifty (50) miles in length, and existing facilities are not available in either Party's network, and the Parties have not been able to resolve the issue through mid-point arrangements, and the Parties cannot agree as to which Party will provide the facility, the Parties may bring the matter before the Commission for resolution on an Individual Case Basis.[11]

Qwest provides facilities LATA-wide at a CLEC's request. This language does not limit the length of facility that Qwest will provide. If a CLEC places an interconnection order that names a point of interface between the carriers such that Qwest must construct new and lengthy facilities, the SGAT simply provides that Qwest *may* bring the matter before the Commission.[12] If there is a need to build beyond 50 miles, Qwest simply would like to reserve the right to submit the question to the Commission.[13]

Dr. Griffing acknowledged at the hearing that he found Qwest's proposal to be acceptable, and Staff has stated in its post-hearing brief that Qwest's position "is a good compromise."[14] Consistent with those endorsements and rulings and recommendations in

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[10] AT&T Interconnection Brief at 12.

[11] This section does not appear in most of Qwest's interconnection agreements in South Dakota. Freeberg Rebuttal re Checklist Item 1 (Qwest Ex. 15) at 10.

[12] Freeberg Rebuttal re: Checklist Item 1 (Qwest Ex. 15) at 10-11.

[13] Tr. 4/23/02 (Freeberg) at 62; *see* Tr. 4/29/02 (Wilson) at 143; *see* Qwest Brief on Checklist Items 1, 11, 13 & 14, at 17-18.

[14] Staff's Brief at 7-8.

Arizona, Colorado, Idaho, Iowa, Montana, Nebraska, New Mexico, Oregon, Utah, Washington, and Wyoming, the Commission should adopt § 7.2.2.1.5 as Qwest has proposed it.

3. Oversized Trunk Groups (SGAT § 7.2.2.8.13)

Qwest has included § 7.2.2.8.13 in the SGAT to provide some protection against CLECs significantly underutilizing trunk groups and thereby causing limited network capacity to go unused. This is an important concern, since significant underutilization of trunk groups can lead to trunk shortages elsewhere in the network and, in turn, service quality problems. The language Qwest originally proposed for this section was accepted by the Facilitator. Nevertheless, AT&T continued to press for further modification, asking specifically for a provision establishing that Qwest would not reclaim a trunk group if a CLEC provided a reason for maintaining excess capacity. As indicated in its post-hearing brief, Qwest agreed to this additional request from AT&T and believed the issue was resolved.[15] Undaunted, AT&T presses on, arguing in dramatic fashion that Qwest is still seeking the "unilateral right" to "snatch-back" trunk groups from CLECs "regardless of the CLEC's needs or plans."[16] That is not the case.

A plain reading of § 7.2.2.8.13 shows that it does not give Qwest the unilateral right to arbitrarily take trunk groups from CLECs.[17] Under that section, if a trunk group has been utilized at less than 50% capacity for three consecutive months, Qwest may notify a CLEC of its desire to resize the trunk group. At that point, to avoid having Qwest resize the trunk group, a

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[15] Qwest Brief on Checklist Items 1, 11, 13 & 14, at 20-21.

[16] AT&T Interconnection Brief at 13.

[17] Qwest Brief on Checklist Items 1, 11, 13 & 14, at 20-21.

CLEC need only "provide Qwest with its reasons for maintaining excess capacity." Inclusion of this provision actually minimizes the likelihood that Qwest will reclaim trunk groups. Moreover, even when Qwest might reclaim a trunk group -- *i.e.*, where a CLEC has no reason for maintaining excess capacity -- the reclamation will leave at least 25% excess capacity.

In sum, AT&T has exaggerated and distorted the effect of this provision. The provision properly permits Qwest to reclaim trunk groups *only* when a CLEC has no justification for maintaining a large amount of excess capacity and ensures that, even then, a CLEC will have significant excess capacity in its trunk groups. Consistent with the Facilitator's recommendation, the Commission should accept this provision.

4. Price Ratcheting (SGAT § 7.3.1.1.2)

Advancing another argument that the Facilitator and most state commissions have rejected, AT&T asserts that Qwest should be required to provide CLECs with a proportional pricing scheme when different types of traffic are commingled on the same trunk group.[18] As an initial matter, it is important to emphasize that when a CLEC has arranged a special access facility with some idle portion, and the same CLEC chooses to use the idle portion for transport of local interconnection trunking, Qwest provides that local transport to the CLEC at *no* charge.[19] AT&T has deliberately chosen to ignore this critical fact in seeking to have the Commission impose a rate ratcheting scheme.

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[18] AT&T Interconnection Brief at 15-17.

[19] Freeberg Rebuttal re: Checklist Item 13 (Qwest Ex. 19) at 6; Tr. 4/23/02 at 26-27; Qwest Brief on Checklist Items 1, 11, 13 & 14, at 46.

Equally significant, section 2.7 of Qwest Tariff FCC No. 1 covers shared use of an interstate special access circuit. When Private Line Transport Service ("PLTS") is shared with local exchange service, this tariff explicitly prohibits proportional pricing.[20] The proportional pricing sought by AT&T is tantamount to an impermissible attempt to change the rates for this federally-tariffed service. Thus, the FCC has considered and specifically rejected the rate ratcheting sought by AT&T when different types of traffic are commingled on the same trunk group.[21]

Dr. Griffing recommends that this Commission accept the Facilitator's recommendation.[22] The Commission should adopt his recommendation, which is supported by the FCC's recent rulings on this issue, the policy considerations relating to universal service cited by the Facilitator, and the multiple state commissions cited in Qwest's post-hearing brief that have rejected this same proposal from AT&T.

B. Qwest Satisfies All Requirements Relating To Checklist Item 1 (Collocation)

No party has continued to assert that Qwest is not in compliance with Checklist Item 1: Collocation. The Commission should likewise find Qwest to be in compliance.

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[20] Qwest Brief on Checklist Items 1, 11, 13 & 14, at 46.

[21] *Id.* at 46-47.

[22] Griffing Direct (Staff Ex. 1) at 46.

C. With the Exception of Certain Checklist Item 2-Related Issues,[23] No Party Provided a Substantive Challenge to Qwest's Compliance with Checklist Items 2 (Access to UNEs), 5 (Access to Unbundled Local Transport) and 6 (Access to Unbundled Local Switching).

In response to Qwest's opening brief on checklist items 2, 4, 5 and 6,[24] AT&T filed a two-page response.[25] AT&T makes no substantive arguments, but merely attaches the comments on checklist items 2, 5 and 6 and Section 272 that it filed on March 18, 2002, and four unanalyzed decisions from the New Mexico, Utah and Washington commissions. As Qwest explained in its opening brief, AT&T failed to submit any testimony or evidence of record concerning checklist items 2, 5 and 6.[26] It did not introduce these comments into the record at the hearing, its checklist item witness did not summarize or discuss them, and no party had the opportunity to cross-examine AT&T regarding these comments. To the extent that AT&T made or suggested any legal arguments in its comments, Qwest addressed them in its opening brief.[27] AT&T has not bothered to provide any analysis of the commission decisions from the three other states that it attaches to its "brief"; indeed, AT&T has failed to even identify the rulings concerning checklist items 2, 5 and 6 that it encourages this Commission to follow. Under these circumstances and in view of the fact that no other party has submitted a response addressing

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[23] The checklist item 2 issues relating to emerging services issues are discussed in the next section (section II.D); checklist item 2 issues related to OSS and CMP are addressed in a separate brief.

[24] Qwest Corporation's Opening Post-Hearing Brief on Workshop Three, Group 4 Issues – Unbundled Network Elements Report (Checklist Items 2, 4, 5 and 6) ("Qwest Brief on Checklist Items 2, 4, 5 & 6").

[25] AT&T's Brief on Checklist Items 2, 5, and 6 and Section 272 Compliance. AT&T filed a separate brief on checklist items 4 and 11. AT&T's checklist item 4 issues are addressed in section II.F.

[26] *See* Qwest Brief on Checklist Items 2, 4, 5 & 6, at 4, note 11.

Checklist Items 2, 5 and 6 (other than Emerging Services, which is addressed in the next section of this Brief, and Qwest's OSS and Change Management Process, which Qwest will address in a separate brief), there is nothing to which Qwest need reply regarding these checklist items.

D. Qwest Satisfies All of the Checklist Item 2 Requirements Relating to Emerging Services.

In its Opening Brief on Emerging Services, Qwest supported its positions regarding four areas: line sharing, packet switching, dark fiber, and subloop unbundling. Of these four areas, only AT&T and the Commission Staff responded, and then only in part. The brief filed by the Staff merely seeks confirmation that two clarifications made during the section 271 hearing, but which were not discussed in Qwest's Opening Brief, have been incorporated into the SGAT language. AT&T's response brief continues to argue its faulty interpretation of dark fiber and subloop unbundling issues that have been put to rest in 12 other jurisdictions. Qwest, therefore, will briefly reply to the limited issues raised. Nonetheless, Qwest reiterates all of the points set forth in its Opening Brief on Emerging Services.

1. Qwest's SGAT Language Incorporates the Two Concerns Identified in the Staff's Brief.

The Staff first seeks clarification that Qwest will enable a CLEC to provide Qwest DSL service when the CLEC is providing voice service over UNE-P or resale.[28] Staff accepts this

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(...continued)

[27] *Id.*

[28] Staff's Brief at 9.

position.[29] As promised in hearing, Qwest's position is incorporated in the South Dakota SGAT at § 9.23.3.11.7. That section provides:

> CLEC may order new or retain existing Qwest DSL service on behalf of End User Customers when utilizing UNE-P-POTS, UNE-P-Centrex, and UNE-P-PBX (analog, non-DID trunks only) combinations, where Technically Feasible. The price for Qwest DSL provided with UNE-P combinations is included in Exhibit A to this Agreement. Qwest DSL service provided to Internet service providers and not provided directly to Qwest or CLEC's End Users is not available with UNE-P combinations.

The Staff's second concern seeks clarification that Qwest agreed to update the provisioning interval for line sharing as Qwest improved its retail provisioning.[30] Again, Staff accepts Qwest's position.[31] Qwest has incorporated into its SGAT the new interval of three (3) days for wholesale line sharing provisioning. This interval appears in Exhibit C to the SGAT. Furthermore, in SGAT § 9.4.5.1.4.1, Qwest added a provision that this interval will be tied to future reductions in the retail provisioning interval:

> 9.4.5.1.4.1 The five (5) day Line Sharing provisioning interval is based on the premise that Qwest Provisioning is and remains at roughly ten (10) Days. It is subject to change either upon consideration of results under the OP-4 diagnostic standard for Line Sharing by either the ROC or upon Commission order. It is also subject to change upon review as Qwest retail intervals drop, under the general standard that the CLEC Line Sharing interval should remain at two (2) Days less than Qwest's retail interval for xDSL services, or if it can be demonstrated that Qwest is: (a) provisioning more than twenty-five (25) percent of CLEC Line Sharing orders without dispatch, (b) providing xDSL service to at least the same percentage of its own End Users without dispatch, and (c) there is a demonstrated

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[29] *Id.*

[30] *Id.*

[31] *Id.*

difference of more than two (2) Days in Provisioning with, versus without dispatch, then the CLEC Provisioning interval will be disaggregated.

Consequently, the Staff's concerns have been fully addressed in the South Dakota SGAT.

2. AT&T's Two Remaining Issues Have Been Overwhelmingly Resolved in Qwest's Favor in 12 Other Jurisdictions; AT&T Fails to Present Any Law or Facts to Demonstrate that the Commission Should Conclude Otherwise.

Qwest does not suggest that the Commission should never independently review matters brought before it merely because other jurisdictions have ruled previously. It is clear from the Commission's decision to conduct a single hearing to evaluate Qwest's section 271 compliance, rather than join in the multi-state workshop process, that the Commission values its autonomous role. However, Qwest remains frustrated at AT&T's stubborn and inarticulate contentions with respect to certain dark fiber and subloop issues. AT&T's broken record on these issues resoundingly confuses and ill-informs these proceedings. AT&T is simply wrong on both the law and facts.

***a.* Qwest's SGAT § 9.7.2.9 is Consistent With the FCC's Current Rulings and Promotes the Underlying Policy Considerations that Protect Universal Service.**

AT&T's first issue is that Enhanced Extended Loops (EELs) comprised of dark fiber are not subject to the FCC's local use restriction. This is simply wrong. SGAT § 9.7.2.9 is straightforward. It restricts the use of dark fiber by a CLEC when it is used "*as a substitute for special or switched access services*" unless the CLEC can demonstrate that it carries "a significant amount of local exchange traffic" to its end users over that section of dark fiber.

Contrary to AT&T's accusation, Qwest does not imply "that the FCC indicated that dark fiber need not be unbundled."[32] Qwest does not dispute its general legal obligation under the Act, as clarified in the *UNE Remand Order*, that it must unbundle dark fiber that is part of a loop facility or dedicated transport.[33] Qwest's SGAT provides for each of these types of unbundling.[34]

On the other hand, Qwest vehemently disputes that it has an obligation to unbundle dark fiber when the dark fiber would be used in a loop-transport combination *for the limited purpose* of providing a substitute for special or switched access services, unless the CLEC can show that it is being used for a significant amount of local exchange traffic.

Special or switched access services have historically been provided to carry non-local traffic, *i.e.* exchange access traffic. Those exchange access services are provided through a comprehensive and separate system that collects access charges under special tariffs for carrying non-local traffic. That independent system[35] was established to subsidize and justify affordable

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[32] AT&T's Response to Qwest Corporation's Opening Post-Hearing Brief on Emerging Services ("AT&T Emerging Services Brief") at 1.

[33] *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, CC Dkt. No. 96-98, FCC 99-238, 15 FCC Rcd 3696, ¶ 174, 325 (rel. Nov. 5, 1999) ("*UNE Remand Order*").

[34] *See generally*, SGAT §§ 9.2 (Unbundled loops), 9.4.1.1 (Line Sharing) and 9.7 (Unbundled Dark Fiber) (Qwest Ex. 21).

[35] As the FCC explained, "[t]he exchange access market occupies a different legal category from the market for telephone exchange services; indeed, at the highest level of generality, Congress itself drew an explicit statutory distinction between those two markets." Supplemental Order Clarification, *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, FCC 00-183, 15 FCC Rcd 9587, ¶ 14 (rel. June 2, 2000) (footnote omitted) ("*Supplemental Order Clarification*").

universal service for all customers throughout the United States. If the collection of access charges can now be avoided by substituting dark fiber at less-expensive UNE pricing for the transmission of non-local traffic, the entire framework of affordable universal service will be jeopardized. The FCC was clear in its concern for these underlying policies and the scope of this hazard:

> we stated our concern that allowing requesting carriers to use loop-transport combinations solely to provide exchange access service to a customer, without providing local exchange service, could have significant policy ramifications because unbundled network elements are often priced lower than tariffed special access services. Because of concerns that universal service could be harmed if we were to allow interexchange carriers (IXCs) to use the incumbent's network without paying their assigned share of the incumbent's costs normally recovered through access charges, [] we agreed that we should further explore these considerations, recognizing that full implementation of access charge and universal service reform was still pending.[36]

The FCC continued:

> Permitting the use of combinations of unbundled network elements in lieu of special access services could cause substantial market dislocations and would threaten an important source of funding for universal service.[37]

Consequently, in its *Supplemental Order Clarification*, the FCC extended its temporary ruling that a "requesting carrier must take affirmative steps to provide local exchange service to a particular end user to demonstrate that it is not seeking to use unbundled loop-transport combinations solely to bypass tariffed special access service."[38] The FCC readopted its

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[36] *Supplemental Order Clarification*, ¶ 2 (footnotes omitted).

[37] *Id.* ¶ 7.

[38] *Id.* ¶ 21.

"significant amount of local exchange service" standard and articulated three different circumstances by which a CLEC could demonstrate that it complies with the standard.[39] The FCC's local exchange restriction as articulated in its Supplemental Order Clarification is incorporated into Qwest's SGAT in sections 9.7.2.9. and 9.23.3.7.2. There is nothing more straightforward.

AT&T would limit the FCC's ruling to enhanced extended links (EELs) and exclude EELs comprised of dark fiber altogether. This reads too much into the FCC's decision, and is inconsistent with the underlying concerns and rationale discussed at length by the FCC in its reasoning.

AT&T argues that (1) dark fiber is not transport because it is unlit and (2) the FCC never discussed dark fiber as an EEL in its decision, so it must be excluded. Both contentions are misguided. First, the FCC basically rejected AT&T's first argument when it determined that dark fiber must be unbundled. The FCC reasoned that "[b]ecause dark fiber is already installed and easily called into service," it must be included in the definitions of loop and dedicated transport even though it must be lit to render it capable of carrying telecommunications services.[40] Consequently, even though dark fiber must be lit before it can "transport" traffic, the entire purpose is to create a transport mechanism. Its unlit status cannot be used to avoid the local exchange traffic restriction imposed by the FCC. As discussed in Qwest's Opening Brief, Mr. Antonuk confirmed this obvious conclusion, as well, when he wrote: "The logic behind the

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[39] *Id.* ¶ 22.

[40] *UNE Remand Order*, ¶¶ 174, 325.

FCC's concern about access charges is in no way diminished because the facilities providing the combination were unlit before a CLEC gained access to them."[41]

Second, AT&T observes that because the FCC never discussed dark fiber as an EEL, we can imply from the FCC's silence that the local exchange traffic restriction does not include dark fiber. On the contrary, the FCC was not silent with respect to what it did reject. The FCC acknowledged that the local exchange traffic restriction excluded stand-alone loops.[42] Consequently, any implication that can be drawn should be in favor of including dark fiber under the local exchange traffic restriction, as it was not specifically excluded.

The FCC's local exchange traffic restriction pertains to "an incumbent LEC's unbundled loop-transport combinations . . . ."[43] Because the FCC has determined that dark fiber falls within both definitions of loop and transport,[44] it is appropriate to apply the local exchange traffic restriction to dark fiber where it comprises in whole or in part a loop-transport combination that can be used *as a substitute for special or switched access services*. Indeed, it is this emphasized phrase that qualifies the nature of the facilities to be so restricted and precisely advances the underlying policies of preventing harm to universal service. The Commission should approve Qwest's SGAT § 9.7.2.9.

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[41] Multi-state Emerging Services Report (June 11, 2001) ("Emerging Services Report") (Qwest Ex. 24) at 57.

[42] *See Supplemental Order Clarification*, ¶ 8, n.31.

[43] *Id.* ¶ 8.

[44] *See UNE Remand Order*, ¶¶ 174, 325.

b. Qwest's SGAT Provisions for Access to Subloops and NIDs at MTE Terminals Should Not Be Modified As They Represent a Balance of Fact-finding and Policy Struck after Thorough Debate Over Numerous Scenarios Found In Multi-Tenant Environments and Are Consistent with the Act and FCC Rules.

AT&T's two-page brief on subloop unbundling hardly illuminates the precise nature of its complaints. However, they appear to be the very same issues that AT&T has now unsuccessfully advocated in 12 other jurisdictions. AT&T wants all NIDs treated the same under the SGAT, regardless of their location or function in the particular Multi-Tenant Environment (MTE). AT&T wants streamlined access to all NIDs to obtain the inside wire in the most expedited and inexpensive manner possible. However, all NIDs are not the same.

Qwest's SGAT provides for the kind of access AT&T wants in section 9.5. Section 9.5 provides for access to NIDs which function as demarcation points in MTEs. Access to NIDs under section 9.5 does not involve access to any subloop in MTEs.[45]

NIDs under section 9.5 are the equivalent of the NIDs defined in the *UNE Remand Order*. There the FCC determined that the Act required ILECs to offer unbundled access to the network interface device (NID) in order to permit a CLEC to connect its loop facilities to inside wiring in MTEs.[46] The FCC identified a few different ways in which this could be achieved, including using the NID as a cross-connect device and using the CLEC's own NID to connect to

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[45] Section 9.5.1 of the SGAT (Qwest Ex. 21) makes this procedure clear: "If CLEC seeks to access a NID as well as a Subloop connected to that NID, it may do so only pursuant to Section 9.3. If CLEC seeks to access only a NID (i.e., CLEC does not wish to access a Subloop connected to that NID), it may only do so pursuant to this Section 9.5." Section 9.3.1.1.4.1 defines the term MTE Terminals to include the situation where access to NIDs includes the connected subloop.

[46] *UNE Remand Order*, ¶ 230.

the ILEC's NID.[47] However, the FCC recognized further that it needed a "flexible and technology-neutral" definition of NID to accommodate both (1) the "considerable variation in the interconnection facilities between carrier and customer-controlled facilities" and new technologies and (2) "additional design variations among the hardware interfaces between carrier and customer premises facilities" likely to evolve with network design and technology.[48] Consequently, the FCC pronounced a broad definition of NID that encompassed future design and hardware potentials.

AT&T has latched onto the FCC's forward-thinking and broad definition of demarcation NIDs as embracing all NIDs, including those that are only accessible via subloops in MTEs. Thus, AT&T claims that because it has a right to "liberal and unfettered access to the NID to obtain the inside wire,"[49] AT&T should be able to access all NIDs via SGAT § 9.5 and avoid the procedures and costs required under SGAT § 9.3 for accessing subloops with NIDs. AT&T's interpretation of the UNE Remand Order is misguided.

First, the FCC's decision dealt with AT&T's interpretation and rejected it out of hand:

> We decline to adopt parties' proposals to include the NID in the definition of the loop. . . . Competitors purchasing a subloop at the NID, however, will acquire the functionality of the NID for the subloop portion they purchase. We therefore find no need to include inside wiring in the definition of the NID, or to include the NID as part of any other subloop element.[50]

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[47] *Id.*

[48] *Id.* ¶ 234.

[49] *See* AT&T Emerging Services Brief at 3.

[50] *UNE Remand Order*, ¶ 235.

Consequently, if a particular MTE scenario requires a CLEC to access subloop, the CLEC automatically acquires the functionality of the NID with the subloop. In such circumstances, the CLEC does not access the NIDs directly because the subloop is the primary facility that a CLEC will be interested in securing to provide its services. That type of NID does not operate as the demarcation point for the MTE. This situation is precisely what Qwest's SGAT § 9.3 addresses.

Second, the Multi-State Workshop on Emerging Services thoroughly reviewed and debated these precise issues. There, it became apparent that the MTE context needed a more pragmatic and non-legalistic approach to encompass "access to such in-building terminals under the various physical and on-premise wiring ownership scenarios that might exist."[51] The definition of the NID issue was revisited again in the Workshop 4, UNE Report. There, Mr. Antonuk's proposed resolution clearly adopts Qwest's interpretation.[52]

AT&T continues to fight this semantic battle because it wants to avoid the requirements of SGAT § 9.3, which it characterizes as burdensome and costly. Because AT&T has overwhelmingly lost this definitional battle and must proceed under section 9.3 when accessing subloops connected to NIDs, AT&T also attacks the requirements of section 9.3 as "significantly limiting access to the internal customer premises wiring, through the NID, . . . to frustrate the facility based CLECs abilities to effectively compete with Qwest."[53]

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[51] Emerging Services Report (Qwest Ex. 24) at 28.

[52] Multi-state Group 4 Report, (August 20, 2001) ("Group 4 Report") (Qwest Ex. 25) at 73 ("Qwest's interpretation of what the FCC meant better accords with the context and construct of the language.").

[53] *See* AT&T Emerging Services Brief at 4.

AT&T specifically demands immediate access and complains of having to submit LSRs and pay for the inventory performed by Qwest. Each of these items was heavily debated, discussed, and resolved in the Emerging Services Workshop. Indeed the "10-5-2" time interval of which AT&T now complains, was at one point recommended by it.[54] Mr. Antonuk's careful analysis of the legitimate and vital functions of the LSR as a standard industry tool for ordering, billing, and repair and maintenance was credibly tempered by his recommendation to adopt an alternate method of submitting LSRs to avoid costs and delays to AT&T.[55] Finally, with respect to inventories, Mr. Antonuk again struck a balance by rejecting AT&T's alternate facility identification proposal, but recommending that Qwest could perform inventories during the LSR suspense period.[56] Qwest inventories of CLEC facilities provide addressing information for subloop terminations. That information is necessary for a variety of reasons, including the submission and processing of the CLEC's order, billing and repair. Qwest should be able to recover the costs of conducting these inventories necessitated by CLECs' requests for access to subloops. Given that inventories are only performed once per MTE as part of the CLEC's first subloop order at the MTE, recovery of these costs under SGAT section 9.3.6.4.1 is appropriate.

The Commission should approve Qwest's SGAT provisions regarding NIDs.

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[54] Emerging Services Report (Qwest Ex. 24), at 34.

[55] *Id.* at 32 ("It provides an effective balancing of the concerns of Qwest and AT&T").

[56] *Id.* at 33.

E. AT&T Raises No Issues That Affect Qwest's Compliance With Checklist Item 3 (Access to Poles, Ducts, Conduits and Rights of Way).

AT&T is the only party that has taken issue with Qwest's compliance with this checklist item.[57] AT&T raises two issues that Qwest already addressed in its post-hearing brief: (1) access to non-recorded agreements for access to ducts/conduits and rights-of-way in multiple tenant environments ("MTEs") and (2) the Multi-State Facilitator's recommendation that Qwest should be permitted to seek a waiver of the 45-day response requirement from this Commission when faced with an unusually large or difficult request for access to poles, ducts/conduits, or rights-of-way.

On the first issue, AT&T states that it prefers the language Qwest and AT&T negotiated in Utah to comply with orders of the Utah Commission. Although Qwest continues to maintain that the Multi-State Facilitator's resolution of this issue was appropriate, if this Commission were to adopt the Utah Commission's approach and SGAT language, Qwest would agree to incorporate that language in its South Dakota SGAT.

[57] Staff notes that some of the language included in Section 10.8.2.27 of the SGAT (Qwest Ex. 21) was not expressly ordered by the Multi-State Facilitator. However, it does not take issue with that language. Staff's Brief at 7.

On the remaining issue relating to the ability to request a waiver of the 45-day response time, Qwest has already responded to AT&T's arguments in its post-hearing brief on the "paper workshop" checklist items.[58] AT&T raises no new arguments that refute the reasonableness of the Multi-State Facilitator's resolution of this issue.

F. Qwest is in Full Compliance with Checklist Item 4 (Access to Unbundled Loops)

AT&T is the only party that questions Qwest's compliance with this checklist item.[59] AT&T raises four[60] demands: (1) that Qwest construct facilities for CLECs at TELRIC rates; (2) that Qwest create the ability for CLECs to obtain direct access to Qwest's LFACs database; (3) that Qwest create the functionality for CLECs to perform mechanized loop tests ("MLTs") on a pre-order basis; and (4) that Qwest revise the repair interval for analog loops and DS-1 loop installation interval in Exhibit C of the SGAT. None of the issues AT&T raises is new, and none of its arguments affects Qwest's compliance with checklist item 4. In fact, the Multi-State Facilitator rejected *all* of them. Furthermore, no state commission has granted AT&T's demands for direct access to LFACS and pre-order MLT.

Qwest addressed AT&T's claims in its Post-Hearing Brief on Workshop 3, Group 4 Unbundled Network Elements Report (Checklist Items 2, 4, 5, and 6) . Qwest will not repeat those arguments here, but will respond to those arguments of AT&T that may warrant further response or clarification.

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[58] Qwest Corporation's Opening Post-Hearing Brief on Paper Workshop Issues (Checklist Items 3, 7, 8, 9, 10, and 12) ("Qwest Brief on Checklist Items 3, 7, 8, 9, 10 & 12"), at 8-11.

[59] On the one issue it raised, Staff found that Qwest is in compliance. Staff's Brief at 10.

[60] AT&T's issues relating to NIDs are addressed separately in connection with Emerging Services under checklist item 2.

L. Neither the Act Nor FCC Orders Supports AT&T's Position on Construction of UNEs for CLECs.

AT&T rehashes its previously-rejected claim that Qwest must construct AT&T's network for it at TELRIC rates.[61] As set forth in Qwest's UNE Brief, the Multi-State Facilitator found that Qwest is under no obligation to construct new facilities for CLECs,[62] and the state regulatory agencies in each of the states participating in that proceeding agreed with that recommendation.

AT&T mischaracterizes Qwest's position by claiming that Qwest has refused to construct facilities for CLECs. To put the record straight, this is not the case. Qwest's SGAT and KMC Agreement provide that Qwest will perform construction for CLECs under a variety of circumstances. For example, if cable capacity is available, Qwest will complete incremental facility work (*i.e.*, condition a loop, place a drop, add a network interface device, card existing subscriber loop carrier systems at the central office and remote terminal, add field cross jumpers, or add central office tie pairs) to complete facilities to the CLEC's end user customer premises.[63] If facilities are not available, Qwest will build facilities dedicated to an end user for a CLEC if Qwest would be legally obligated to build such facilities as a provider of last resort ("POLR") for its retail end users or under its obligation as an eligible telecommunications carrier ("ETC") to provide basic local exchange service.[64] Also, Qwest will add CLEC requests to current facility

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[61] Qwest will refer to the Response Brief of AT&T Regarding Checklist Item 4 – Unbundled Loops and Checklist Item 11 – Local Number Portability as "AT&T's Checklist Item 4 and 11 Response."

[62] Group 4 Report (Qwest Ex. 25) at 24-26.

[63] SGAT § 9.1.2.1.2 (Qwest Ex. 21).

[64] *Id.* § 9.1.2.1.3.

builds and notify CLECs of the ready-for-service date for their requested UNEs.[65] Qwest also will notify CLECs of major outside plant facility builds through the ICONN database.[66]

AT&T also misstates Qwest's policy on holding CLEC orders if facilities are not available. Qwest does not immediately cancel a CLEC's order if no compatible facilities are immediately available. As set forth above, Qwest will hold a CLEC's order (i) if the request falls within Qwest's POLR or ETC obligations, (ii) while it explores incremental facility work to make a UNE available, and (iii) if the CLEC's UNE request would be covered by a pending construction job.

In addition, after Qwest has reviewed the options described above, Qwest will hold a CLEC's order for 30 business days to determine if facilities have become available as a result of normal "churn" in the network.[67] If such facilities become available, they are assigned to pending orders on a first-come, first-served basis. The CLEC must approve the activity prior to installation of the CLEC order. In other states, Qwest has offered to include SGAT language to memorialize this policy, and Qwest will include the same language, set forth below, in the South Dakota SGAT:

> 9.2.2.16 Lack of Facilities; Priority Right to Facilities. In the event Qwest notifies CLEC that facilities ordered are not available from Qwest at the time of the order, Qwest shall maintain the order as pending for a period of thirty (30) business days. If facilities become available to fill the order within that thirty (30) business day period, Qwest shall notify the CLEC of such availability. CLEC and Qwest acknowledge that the

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[65] *Id.*

[66] *Id.* § 9.1.2.1.4.

[67] Tr. 4/23/02 (Pappas) at 208.

availability of facilities hereunder is on a first come, first served basis. Any facility orders placed by any other provider, including Qwest, which predate CLEC's order shall have priority in any facilities made available under the terms of this section.[68]

Other CLECs have endorsed this language in connection with Qwest's currently pending FCC application.[69]

If, after 30 business days, the requested UNE remains unavailable, Qwest will cancel the CLEC's order. However, the CLEC may submit a second order, and Qwest will continue to attempt to assign compatible facilities. Moreover, at any time the CLEC still may request that Qwest construct the UNE under the special construction provisions of the SGAT § 9.19, and Qwest will do so upon the CLEC's acceptance of the special construction quote.

Currently, if a CLEC's order does not fall within one of the criteria in Section 9.1.2 of the SGAT, discussed above, the CLEC may request that Qwest construct facilities for it under the special construction provisions of the SGAT, which are contained in Section 9.19. Based upon CLEC input, Qwest has outlined this process, called the "CLEC Requested UNE Construction" ("CRUNEC") process, in Qwest's Wholesale Product Catalog, or "PCAT."[70] Qwest reviewed its UNE construction process with CLECs via the Change Management Process ("CMP"). The CRUNEC process is specifically designed to produce a special construction quote for the CLEC

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[68] Although this language reflects Qwest's processes as described by Mr. Pappas at the hearing, it has not yet been in included in the South Dakota SGAT. Qwest will include this language in its compliance SGAT in connection with the Commission's decisions in this docket.

[69] In an ex parte filed with the FCC, Covad Communications expressed approval of this policy. Ex Parte Filed by Covad, *Application by Qwest Communications International Inc. for Authority to Provide In-Region, InterLATA Service in Colorado, Idaho, Iowa, Nebraska, and North Dakota*, WC Docket No. 02-148 (filed June 20, 2002).

[70] The PCAT is available at http://www.qwest/com/wholesale/pcat/index.html.

that is based upon the same criteria Qwest uses to assess and determine the special construction costs that a retail end user would pay.

As for federal guidelines on the obligation to build, AT&T is also incorrect in its claim that Qwest has cited "irrelevant" provisions of FCC orders.[71] The FCC has addressed a BOC's construction obligations in the *Verizon Pennsylvania Order*.[72] Qwest's position with respect to this issue is at least as liberal as that of Verizon, which has been granted section 271 approval in several states. Furthermore, the FCC has identified the obligation to build new UNEs as an open issue and has expressed its intention to address the issue in its triennial UNE review.[73] Therefore, for purposes of evaluating Qwest's compliance with section 271, Qwest should be considered to be in compliance with existing federal law with respect to this issue. Notably, AT&T cites *no* provision of the Act and, most important, no FCC section 271 Order that requires a BOC to construct facilities for CLECs at TELRIC rates as a condition of section 271 relief.[74]

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[71] AT&T's Checklist Item 4 and 11 Response at 4.

[72] *See* Memorandum Opinion and Order, *Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks, Inc., and Verizon Select Services Inc. for Authorization to Provide In-Region, InterLATA Services in Pennsylvania*, CC Docket No. 01-138, FCC 01-269, ¶¶ 91-92 (rel. Sept. 19, 2001) ("*Verizon Pennsylvania Order*").

[73] Notice of Proposed Rulemaking, *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Dkt. Nos. 01-338, 96-98, 98-147, FCC 01-361 ¶ 65 (rel. Dec. 20, 2001).

[74] AT&T cites the Washington commission's orders on this issue. Of the state commissions to address this issue, Washington stands alone thus far in the revisions it has recommended.

Contrary to AT&T's arguments, the fill factors in UNE rates have no correlation whatsoever to an obligation to construct facilities for CLECs at TELRIC rates.[75] Qwest's TELRIC cost studies estimate the costs of building a network to replace the existing network using least-cost, forward-looking technology. Because the studies build a replacement of the current network, they do not include investment for *new* facilities that *CLECs* may request.[76] CLECs are not already paying for the construction of new facilities just because fill factors of less than 100% are used in calculating UNE rates. The difference between 100% and the actual fill factor accounts for the spare capacity that arises out of the modularity of network components. For instance, 2 pairs working in a 3 pair drop or 15 pairs working in a 25 pair cable. AT&T has often argued that the appropriate fill factor should be 85 percent. Yet, if Qwest were to build to observing those fill factors, the occurrence of situations requiring new construction would be far greater than they currently are. AT&T cites no state commission that has endorsed its argument. In Colorado, the Hearing Commissioner dismissed it out of hand, stating: "Qwest correctly argues that the cost studies considered by the Commission evaluated fill factors and costs for a replacement network and that those studies do not contemplate reimbursement for the construction of new CLEC facilities. Rather, reimbursement for the construction of new facilities occurs under § 9.19 of the SGAT."[77]

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[75] AT&T Checklist Items 4 and 11 Response at 8.

[76] Rebuttal Affidavit of Jean M. Liston re: Checklist Item 4, filed April 2, 2002 ("Liston Rebuttal re: Checklist Item 4) (Qwest Ex. 13) at 46-47.

[77] *Id.* at 45-46 (quoting Decision No. R01-1141, VA Impasse Issues Decision, *In The Matter Of The Investigation Into U S WEST Communications, Inc.'s Compliance with § 271(c) of the Telecommunications Act of 1996*, Docket 97I-198T, at 26 (Colo. Hearing Commissioner Nov. 6, 2001)).

As set forth in Qwest's Post-Hearing Brief on Checklist Items 2, 4, 5, and 6, the South Dakota CLECs that are actually competing with Qwest in South Dakota over their own facilities do not join AT&T's demand.[78] Instead of building its own competing network as these competitors have done, AT&T seeks to have Qwest construct AT&T's network for it. The FCC has repeatedly stated that competition will come from facilities-based carriers providing service over their own networks.[79] Requiring Qwest to build UNEs for CLECs, however, does precisely the opposite. Thus, were this Commission to accede to AT&T's demand, it would be discouraging the very facilities-based competition Black Hills FiberCom ("FiberCom")and Midcontinent Communications ("Midco") provide in South Dakota. AT&T's demand that Qwest construct UNEs at TELRIC rates is not only unsupported in the law, it is bad public policy. The Commission should reject it.

2. AT&T's Demand for Direct Access to LFACS Has Been Roundly Rejected.

AT&T claims that Qwest must provide it with direct access to Qwest's LFACS database. Staff,[80] the Multi-State Facilitator, and every state to consider this issue, has rejected AT&T's arguments. This Commission should do likewise.

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[78] Qwest Brief on Checklist Items 2, 4, 5, and 6 at 57. Equally telling is that AT&T has cited no instance in which it has been denied facilities by Qwest in South Dakota.

[79] Fourth Report and Order, *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, FCC 01-204 ¶ 4 (Aug. 8, 2001) ("*Collocation Remand Order*"); First Report and Order and Further Notice of Proposed Rulemaking in WT Docket No. 99-217, Fifth Report and Order and Memorandum Opinion and Order in CC Docket No. 96-98, and Fourth Report and Order and Memorandum Opinion and Order in CC Docket No. 88-57, *In the Matter of Promotion of Competitive Networks in Local Telecommunications Markets*, WT Docket No. 99-217, CC Docket Nos. 96-98, 88-57, FCC 00-366, ¶ 4 (rel. Oct. 25, 2000) ("*MTE Order*").

[80] Tr. 4/30/02 (Griffing) at 138-39.

AT&T's Response on Checklist Items 4 and 11 generally repeats its pre-filed testimony on this point, which Qwest has responded to in its Brief on Checklist Items 2, 4, 5, and 6.[81] AT&T claims that Qwest must provide access to "all of the loop qualification information that any Qwest employee has access to, including [the] LFACS database . . . ."[82] AT&T provides no response, however, to Qwest's unrefuted testimony that Qwest provides loop qualification information from LFACS in no fewer than three tools: the IMA Raw Loop Data tool, the wire center Raw Loop data tool, and the IMA Loop Qualification tool. To clarify, LFACS is the underlying source of the loop qualification information in all of these tools. Thus, CLECs today are, in fact, receiving access to loop qualification information from LFACS.

AT&T's claim that it needs direct access to LFACS to obtain more "accurate" information is meritless. Although AT&T has presented no evidence of alleged "inaccuracies," any "inaccuracies" in the loop make up information in the tools would be the same in LFACS because LFACS is the source of the information in these tools. In other words, because the wholesale and retail loop qualification tools share the same data source, LFACS, direct access to LFACS will not provide any more accurate information. Although AT&T claimed that LFACS may have more "current" information, Qwest's tools have been enhanced to perform a recent changes check with each loop qualification query. Thus, if there has been any update to the loop information in LFACS, the existing Qwest tools will return that updated information.[83]

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[81] *See* Qwest Brief on Checklist Items 2, 4, 5, and 6 at 65-76.

[82] AT&T Checklist Items 4 and 11 Response at 9.

[83] Liston Rebuttal re: Checklist Item 4 (Qwest Ex. 13) at 25-26.

Furthermore, there is no basis to any claim that AT&T is being "denied" loop qualification information from LFACS or that access to LFACS would provide more complete loop qualification information. At the hearing, AT&T could identify no instance in which it was denied loop qualification information.[84] AT&T claimed that even if it was no experiencing so-called "problems" with obtaining loop make up information in South Dakota, it was allegedly "experiencing" such "problems" elsewhere. AT&T's brief and testimony, however, cite no specific instance in any state in which it was deprived of necessary loop qualification information in the context of an actual pre-order query. AT&T has attached to its testimony and briefs transcript cites from numerous other state proceedings as well as documents never introduced or mentioned in its pre-filed testimony. Yet on this issue, where AT&T claims there is a "problem," it has cited no instances from any state. The simple fact is that AT&T, as a member of the far more dominant broadband group of cable providers, has little need or interest in using Qwest's tools to qualify telephone lines for DSL service.

AT&T's lack of familiarity with Qwest's tools is evident in its discussion of what is purportedly "missing" from the tools. For example, AT&T confusedly claims that the Raw Loop Data tool does not include information on "loop conditioning."[85] To support its claim, AT&T

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[84] Tr. 4/29/02 (Wilson) at 147-48. In its Checklist Item 4 and 11 Response, AT&T suggests that Qwest does not provide CLECs access to OSP-FM or CIMAGE documentation. AT&T Checklist Items 4 and 11 Response at 12-13. AT&T did not make this claim in the hearing, nor did it raise it in its pre-filed testimony. Thus, it is inappropriately raised, if at all, in its brief. Nevertheless, AT&T's claim is wrong: Qwest provides CLECs the ability to view both OSP-FM and CIMAGE documents. Specifically, the PCAT for Poles, Ducts, Conduits, and Rights-of-Way contains the OSP Viewing Guidelines. This section of the PCAT can be accessed at the following web address: http://www.qwest.com/wholesale/pcat/poleductrow.html. Thus, CLECs have access to these records today.

[85] AT&T Checklist Items 4 and 11 Response at 14.

attaches 25 pages of irrelevant discussion from the Colorado workshop in which neither the Raw Loop Data tool nor the Loop Qualification tool is mentioned once.[86] Furthermore, Qwest is confused by what AT&T means by this statement, since both the Raw Loop Data tool and the Loop Qualification tool return information on the presence of load coils and bridge taps, the loop equipment that indicates if loop conditioning will be required. In fact, the Raw Loop Data tool also provides information on the type of load coil, the presence of load coils and bridge tap by segment, and the bridge tap offset or distance.[87] Thus, AT&T's assertions here have no merit.

AT&T resuscitates its tired claim that the Raw Loop Data tool does not include spare facilities that are not connected to the switch.[88] However, Qwest presented unrefuted testimony that the Unassigned Address query in the Raw Loop Data tool returns loop make up information on partially connected facilities, which are facilities that are *not* connected to the switch.[89] Regardless, AT&T ignores that the FCC has already determined that incumbent LECs are not even required to provide loop make up information on spare facilities.[90]

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[86] *Id.* (citing CO Transcript (4/18/01) at 25-53). The discussion AT&T references dealt with the wholly unrelated issue whether Qwest should charge CLECs for loop conditioning if the loop in its current, conditioned state does not meet voice grade standards. As a review of the transcript pages makes abundantly clear, the loop qualification tools were not discussed at all.

[87] *See* Qwest Brief on Checklist Items 2, 4, 5, and 6 at 68.

[88] AT&T Checklist Items 4 and 11 Response at 14.

[89] Liston Rebuttal re: Checklist Item 4 (Qwest Ex. 13) at 24-25.

[90] Memorandum Opinion and Order, *In the Matter of Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, CC Docket No. 00-217, FCC 01-29, ¶ 128 (released Jan. 22, 2001) ("*SBC Kansas/Oklahoma Order*") ("it is not self-evident from the *UNE Remand Order* that a BOC must provide loop make-up information on all loops that serve a particular address.").

AT&T attempts to bolster its testimony on direct access to LFACS with documents that were never introduced into the record, not discussed in its pre-filed testimony, and not subject to cross-examination. For example, AT&T includes in its Response Brief an argument regarding a Batch SUMO Report and attaches an excerpt from this document as a confidential "exhibit" to its brief.[91] Presumably in an attempt to justify its failure to raise the document (or any issue at all regarding such batch reports) in its testimony or at the hearing, AT&T claims that this document was recently produced in discovery in Minnesota. However, the document at issue was provided to KPMG months ago in response to a request in connection with the ROC OSS test. Notably, the document is dated August 2001, belying any claim that it is "new."

In any event, it is a mystery what point AT&T is trying to make by attaching the document to its brief. AT&T's entire discussion on the document is a disjointed cut-and-paste excerpt from a discovery motion from another proceeding. While AT&T may believe the document is "relevant" for purposes of discovery in another state proceeding, AT&T has failed to provide any rationale how this Commission should consider the document in the context of AT&T's demand for direct access to the LFACS database. Qwest cannot respond to, and this Commission cannot give credence to, AT&T's haphazard arguments on a document that has not been placed into evidence, was not discussed in AT&T's pre-filed testimony or at the hearing, was not subject to cross-examination, and that was not briefed in any coherent fashion.[92]

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[91] AT&T Checklist Items 4 and 11 Response at 15.

[92] To the extent the Commission can make heads or tails out of AT&T's arguments, Qwest believes it is important to note, as Qwest has informed AT&T in subsequent discovery responses in Minnesota, that the document at issue is completely unrelated to Qwest's bulk deload project as well as its efforts to improve the quality of the LFACS database.

AT&T's claim that other BOCs provide more complete loop make up information is without foundation. Exhibit JML-LOOP-4 attached to the Rebuttal Testimony of Ms. Jean Liston (which Barbara Brohl adopted) demonstrates that the information returned in Qwest's tools exceeds that which Verizon described as providing at the time of its Rhode Island application. Furthermore, Southwestern Bell provides access to loop make up information in LFACS in the same manner as Qwest – through OSS interfaces.[93] Curiously, AT&T states that AT&T's "main point" is that Verizon and Southwestern Bell permit CLECs to request a manual search of those BOCs' back office systems and records, but Qwest does not.[94] Qwest, however, committed to perform such a manual search, as discussed in Ms. Liston's Rebuttal Testimony, adopted by Ms. Brohl at the hearing, as described in Qwest's Brief on Checklist Items 2, 4, 5, and 6, and as reflected in Qwest's Second Revised SGAT in Section 9.2.2.8 (Qwest Ex. 81).[95] Moreover, AT&T cites SGAT language that Qwest and AT&T developed in Arizona that further refines Qwest's previous commitment.[96] This language was developed after Qwest filed its post-hearing briefs in South Dakota and, accordingly, Qwest could not include it in the updated Second Revised SGAT filed on May 20, 2002. Nevertheless, because Qwest has already agreed in South Dakota to perform a manual search of its back office systems for loop make up

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[93] *SBC Kansas/Oklahoma Order* ¶ 121. AT&T baldly claims that "CLECs access Verizon's and Southwestern Bell's LFACs, in their entirety, via a graphical interface." AT&T Checklist Item 4 and 11 Response at 19, n. 41. It cites nothing, however, to support this blanket assertion. Moreover, as Qwest demonstrated, Qwest provides more loop make up information than Verizon described providing in its Rhode Island application.

[94] AT&T Checklist Items 4 and 11 Response at 17, 19.

[95] *See* Qwest Brief on Checklist Items 2, 4, 5, and 6 at 75-76.

[96] AT&T Checklist Items 4 and 11 Response at 22.

information, Qwest will include the language AT&T quotes at page 22 of its Response, and which AT&T has endorsed, in Qwest's next SGAT filing.[97] Thus, by its own admission, AT&T's claim that Qwest "refuses" to perform a manual search of its back office systems and databases is unfounded.

AT&T's claim that Qwest does not give it access to all underlying loop make up information available to Qwest is rendered moot by Qwest's commitment to perform a manual search of its back office databases, records and systems for loop make up information. This process also moots any claim that Qwest denies CLECs full or accurate loop make up information. Under the manual loop make up process, CLECs may request that Qwest perform a manual records search for loop make-up information in the unlikely event the Raw Loop Data or Loop Qualification tools provide (i) incomplete or unclear loop make-up information for a particular address or telephone number or (ii) if the CLEC provides evidence that demonstrates that the returned loop information may be inaccurate. In any of these situations, Qwest will perform a manual search of its back office records, systems and databases containing loop information to obtain the loop make-up information requested by the CLEC. While spare facilities are available in the Raw Loop Data tool, when loops are served by digital loop carrier and CLECs need additional information, Qwest provides the availability of spare feeder and

[97] To clarify, the SGAT language that AT&T cites on page 22 of its brief had not been developed at the time Qwest filed its most recent SGAT with its post-hearing briefs. When Qwest makes its next SGAT filing, the language Qwest included in its Second Revised SGAT dated May 20, 2002 (Qwest Ex. 81) in Section 9.2.2.8 will be replaced with a new Section 9.2.2.8.6. The new section 9.2.2.8.6 will reflect the language AT&T and Qwest developed in Arizona and that AT&T cites at page 22 of its Checklist Items 4 and 11 Response.

distribution facilities that can be used to provision service to the end user, including any spare facilities not connected to the switch, and the associated loop make-up information.

In the event that loop make-up information is missing for a particular loop segment, Qwest will investigate its outside plant engineering records for the cable and pair from the central office to the serving area interface ("SAI") and from the SAI to the customer's serving terminal. Qwest has agreed to return the loop make-up information to the CLEC electronically within 48 hours.[98] Qwest also then will update the applicable databases with this loop make-up information.[99] With this commitment, there is no basis for this Commission to order Qwest to provide "direct" access to LFACS. Indeed, no state commission to date has ordered such access.

Finally, AT&T makes a half-hearted claim that Qwest must permit CLECs to "audit" its back office systems and database to "ensure that CLECs have parity access to the back office loop information."[100] Neither the *UNE Remand Order* nor any section 271 order imposes an obligation that an incumbent subject itself to numerous, duplicative audits as a condition of meeting its legal obligations. Indeed, AT&T does not point to any FCC order that requires such audits either as a condition of satisfying the *UNE Remand Order* or as a condition of section 271 relief. Section 271 proceedings are limited in scope and are not the proper forum to create new obligations.[101] Nor are section 271 proceedings designed to require BOCs to accede to every

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[98] SGAT § 9.2.2.8 (Qwest Ex. 81); AT&T Checklist Items 4 and 11 Response at 22 (citing new SGAT § 9.2.2.8.6).

[99] *Id.*

[100] AT&T Checklist Items 4 and 11 Response at 22.

[101] Memorandum Opinion and Order, *Application of SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell* (continued...)

demand of CLECs as a condition of section 271 approval.[102] Requiring Qwest to include an audit provision in its SGAT is particularly inappropriate because Qwest has already had its loop qualification systems audited by an independent third party, KPMG Consulting, as part of Test 12.7 of the OSS test, and KPMG found that Qwest provides CLECs with loop qualification information at parity with itself. Finally, because Qwest commits to provide loop make up information from its "records, back office systems and databases where loop information resides" when its tools do not return complete loop make up information, there is no reason to order an audit to ensure that CLECs have access to this information: the commitment is there already. Because the commitment to provide the back office information CLECs seek is in the SGAT, an audit is simply unnecessary.

3. No State Commission Has Accepted AT&T's Demand To Require Qwest to Create the Functionality for CLECs to Perform MLTs on a Pre-Order Basis.

It is unrefuted that Qwest does not perform mechanized loop tests, or MLTs, on a pre-order basis as a function of individually qualifying loops for Qwest DSL service. Yet, AT&T demands that Qwest must create this functionality for CLECs. Notably, AT&T makes no attempt to rebut Qwest's numerous reasons for declining AT&T's demand. For example, AT&T does not dispute (i) that MLT information is not reliable for loop qualification purposes, overestimating loop length by as much as 20 percent; (ii) that the version of MLT as deployed in Qwest's network today does not detect the presence of bridged taps or load coils, critical

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(...continued)
Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In Region, InterLATA Services in Texas, CC Docket No. 00-65, 15 FCC Rcd 18354, ¶ 22-26 (2000) ("*SBC Texas Order*").

information for determining if a loop can support DSL service; or (iii) that AT&T's demand would cause contention for the limited switch access for performing MLTs and could lead to an increase in the mean time to repair and unnecessary delays in repairing service for all carriers.

AT&T's only argument is that Qwest, at one time, performed MLTs to load the Loop Qualification Database and, therefore, should create this functionality for CLECs. AT&T ignores, however, that the Loop Qualification Database fees the wholesale loop qualification tools available to CLECs. As a consequence, Qwest has no competitive advantage with respect to access to that information: it is equally available to all carriers.

Staff has already determined that Qwest complies with Checklist Item 4 on the issue of CLEC access to LFACS and other Loop Information Databases.[103] In its post-hearing brief, Staff credited Qwest's testimony that it was providing CLEC access to Facility Check and that it has enhanced CLEC access to loop qualification material in concluding that "Qwest has complied with this issue."[104] In addition to Staff and the Multi-State Facilitator, every state commission to have considered this issue has rejected AT&T's demand that Qwest create the pre-order MLT functionality for CLECs. In fact, the only two commissions to initially grant AT&T's demand (New Mexico and Utah) both recently *reversed* their determinations and found that Qwest has no obligation to create this functionality.[105] These state commissions found that

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(...continued)

[102] *Id.*

[103] Staff's Brief at 9-10.

[104] *Id.* at 10.

[105] The New Mexico commission had issued an order stating that Qwest should provide "unmediated" access to certain loop information in some circumstances and that Qwest should create the (continued...)

Qwest's commitment to perform a manual loop makeup search on behalf of CLECs met Qwest's obligations under the Act and FCC orders to provide CLECs with loop make up information. As discussed above, Qwest has agreed to perform a manual loop make up search and will include the updated manual loop qualification commitment in the South Dakota SGAT at its next SGAT filing. Accordingly, like every other state commission to consider this issue, the South Dakota Commission should find that Qwest has no obligation to create the functionality for CLECs to perform disruptive MLTs on a pre-order basis.

4. AT&T Has Presented No Evidence That The Current Loop Intervals Deny It A Meaningful Opportunity To Compete.

AT&T makes no new arguments in its quest to shorten the intervals for DS-1 installations and for analog loop repairs. Performance measures, or PIDs, for both installation of DS-1 loops and repair of analog services developed in the ROC collaborative provide that Qwest must install DS-1s and repair analog loops in parity with its retail services. The relevant retail interval for DS-1 loops is nine days -- the same interval that appears in Exhibit C of the KMC Agreement and SGAT. For analog repair, Qwest commits to repair both retail and wholesale service in the

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(...continued)
functionality for CLECs to perform pre-order MLTs. The New Mexico commission reversed both these rulings, finding that the manual process that Qwest agrees to include in Section 9.2.2.8.6 of its SGAT fulfills Qwest's obligations under the Act. Order on Rehearing of Aspects of Group 4 Order and Qwest's Demonstration of Compliance Regarding Access to Unbundled Loops, *In the Matter of Qwest Corporation's Section 271 Application and Motion for Alternative Procedure to Manage the Section 271 Process ; In the Matter of Qwest Corporation's Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996*, Utility Case Nos. 3269 and 3537 (N.M. PRC July 9, 2002). The Utah commission also reversed its previous ruling endorsing AT&T's pre-order MLT claim. Like New Mexico, the Utah commission held that Qwest's offer to perform manual loop make up searches met CLECs' needs for loop make up information. Final Order Regarding Qwest § 271 Compliance, *In the Matter of the Application of Qwest Corporation for Approval of Compliance with 47 U.S.C. § 271(d)(2)(B)*, Docket No. 00-049-08 (Utah PSC July 8, 2002).

same interval: 24 hours. AT&T was an active participant in establishing the PIDs that apply to installation of DS-1 loops and repair of analog facilities. In the Multi-State proceeding, the Facilitator agreed with Qwest that the loop intervals in Exhibit C to the SGAT were integrally tied to the performance measures that AT&T and other CLECs had negotiated in the ROC:

> The evidence *demonstrates conclusively* that the ROC established its loop installation interval related performance measures (OP-3 and OP-4) through an open and collaborative process that benefited from full, open, and substantial participation by the CLEC community. *The evidence also established that the discussion of those intervals (which measure percent of intervals on time and average durations) centered upon and were integrally related to the intervals of Qwest's Service Interval Guide, which forms the basis of the installation intervals set forth in SGAT Exhibit C.*[106]

Because the Exhibit C intervals are integrally related to the negotiated PIDs, the Facilitator found that the reasonableness of the existing intervals should be accorded substantial weight.[107]

As an active participant in the ROC collaborative effort, AT&T certainly could have requested different "benchmark" performance measures. It did not. The FCC has been crystal clear that performance measures developed in a collaborative process are presumed to give competitors a meaningful opportunity to compete.[108]

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[106] Group 4 Report (Qwest Ex. 25) at 49.

[107] *Id.*

[108] Memorandum Opinion and Order, *In the Matter of Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) and Verizon Global Networks Inc., For Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket No. 01-9, FCC 01-130 ¶ 13 (rel. Apr. 16, 2001) ("*Verizon Massachusetts Order*"); Memorandum Opinion and Order, *Application of Bell Atlantic New York, Inc. for Authorization under Section 271 of the Communications Act to Provide In-Region, InterLATA Services in the State of New York*, CC Docket No. 99-295, 15 FCC Rcd 3953 ¶ 55 (rel. Dec. 22, 1999) ("*Bell Atlantic New York Order*") ("At the same time, for functions for which there are no retail analogues, and for which performance benchmarks have been developed with the ongoing participation of (continued...)

AT&T cites rulings from other states in which the state commission revised the DS-1 installation interval and suggests that this Commission should follow them.[109] However, in Washington and New Mexico, the Commissions revised the DS-1 intervals based upon existing state-specific service quality requirements or commitments. There are no South Dakota-specific rules that trump the agreed-upon interval for DS-1 loops or analog repair.

Furthermore, the current intervals present no competitive disadvantage to AT&T. As noted above, the intervals that AT&T challenges are the same intervals Qwest provides to its retail customers. AT&T presents no South Dakota evidence that Qwest installs DS-1 loops more quickly for itself or performs analog repair services more quickly for itself. To the extent the Commission has any concern that Qwest would perform such services more quickly for itself, it is important to note that the OP-4 PID measures the average installation interval for DS-1 loops for Qwest and CLECs and any disparity in performance would be shown there. The MR-6 PID measures the average repair interval and again will report any disparity in performance. Thus, there is no basis for AT&T's claim that the current intervals in Exhibit C deny it a meaningful opportunity to compete.

(...continued)
affected competitors and the BOC, those standards may well reflect what competitors in the marketplace feel they need in order to have a meaningful opportunity to compete").

[109] AT&T cites no state commission decision that has modify the analog repair interval as AT&T requests. Qwest is aware of none.

F. Qwest is in Full Compliance with Checklist Item 5 (Access to Unbundled Local Transport).

As noted above in section II.C, no party has substantively challenged Qwest's compliance with Checklist Item 5. The Commission should likewise find Qwest to be in compliance.

G. Qwest is in Full Compliance with Checklist Item 6 (Access to Unbundled Local Switching).

As noted above in section II.C, no party has substantively challenged Qwest's compliance with Checklist Item 6. The Commission should likewise find Qwest to be in compliance.

H. Qwest is in Full Compliance with Checklist Item 7 (911 and E-911 Services and Directory Assistance).

Because no party has substantively challenged Qwest's compliance with Checklist Item 7, the Commission should likewise find Qwest to be in compliance.

I. The Single Issues Raised with Regard to Checklist Item 8 (White Pages Directory Listings) was an Isolated Incident. Qwest Has Taken All Necessary Steps to Comply with Checklist Item 8.

Only one party, Midco, raised issues concerning Qwest's compliance with Checklist Item 8 (White Pages Directory Listings). Midco contends that Qwest failed to provision properly requests for residential directory listings for resold customers in January and February 2002 and a request for a business directory listing in August 2001.[110] As Qwest witness Lori Simpson

[110] Midcontinent's Post-Hearing Brief at 5-7. Elsewhere, however, Midco acknowledges "a marked improvement in Qwest's attention to CLEC services." *Id.* at 5.

testified, Qwest acted to respond to and address Midco's concerns.[111] In any event, these isolated incidents are insufficient to defeat an application under Section 271. The FCC has consistently held that it "will not withhold section 271 authorization on the basis of isolated instances of allegedly unfair dealing or discrimination under the Act."[112] Accordingly, the Commission should reject Midco's contention that Qwest is not in compliance with Checklist Item 8.

J. Qwest is in Full Compliance with Checklist Item 9: Numbering Administration.

Because no party has substantively challenged Qwest's compliance with Checklist Item 9, the Commission should likewise find Qwest to be in compliance.

K. Qwest is in Full Compliance with Checklist Item 10: Call-Related Data Bases and Signaling

Because no party has substantively challenged Qwest's compliance with Checklist Item 10, the Commission should likewise find Qwest to be in compliance.

L. Qwest Is Fully Compliant With all Aspects of Checklist Item 11: Local Number Portability ("LNP")

The only party continuing to raise a concern regarding Qwest's compliance with Checklist Item 11, Local Number Portability ("LNP") is AT&T.[113] *See* Post-Hearing Response Brief of AT&T Regarding Checklist Item 4 and Checklist Item 11, filed June 28, 2002. As discussed in more detail below, AT&T has simply reiterated the issues raised by Mr. Wilson in his written and oral testimony. AT&T presents no new issues and does not provide specific

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[111] *See* Qwest's Brief on Checklist Items 3, 7, 8, 9, 10, and 12, at 30-32.

[112] *See, e.g., Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, 15 FCC Rcd. 3953, ¶ 444 (1999).

[113] AT&T Checklist Item 4 and 11 Response.

CONTINUATION

[1]

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rebuttal to the information Qwest provided in its Post Hearing Brief. Regardless of the issues raised by AT&T, Qwest has met all of the requirements for Checklist Item 11 and is full in compliance.

AT&T complains that revised PID OP-17 has not generated performance results for AT&T to analyze and comment upon.[114] The performance measure was revised at the request of AT&T to address the issue of AT&T's requested new disconnect process implemented by Qwest.[115] Due to the relatively recent implementation of this compromise, this PID has not yet been audited by the Liberty Consulting Group. It is notable that AT&T has raised no complaint about the efficacy of the disconnect delay in its Post Hearing Reply Brief.[116] AT&T has shown no reluctance in bringing issues to the Commission so it stands to reason that if AT&T was experiencing any problems in the disconnect delay solution as implemented it would have brought those problems forward. AT&T's silence on any potential failures by Qwest to comply with its obligations speaks volumes about Qwest's actual performance.

AT&T also asserted in its Post Hearing Brief that Qwest has not adequately expressed its commitment to the delay disconnect solution into the SGAT. AT&T has not even bothered to review Qwest's South Dakota SGAT or the Rebuttal Affidavit of Margaret S. Bumgarner, both of which do in fact include the language AT&T asserts is missing. Qwest has made a legally

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[114] *Id.* at 38.

[115] *See* Rebuttal Affidavit of Margaret S. Bumgarner re Checklist Item 11, filed on Apr. 2, 2002 (Qwest Ex. 39) at page 12, note 10. Contrary to the assertions of Mr. Wilson and AT&T that Qwest proposed the disconnect delay solution, it was AT&T who initially requested this alternative and the responding change in the PID.

[116] AT&T Checklist Item 4 and 11 Response at 38-42.

binding commitment to provide the delay disconnect in SGAT Section 10.2.5.3.1 which mirrors almost exactly what AT&T has demanded:

> 10.2.5.3.1 Qwest will set the ten (10) digit unconditional trigger for numbers to be ported, unless technically infeasible, by 11:59 p.m. (local time) on the business day preceding the scheduled Port date. (A 10-digit unconditional trigger cannot be set for DID services in 1AESS, AXE10, and DMS10 switches thus managed cuts are required, at no charge.) The ten (10) digit unconditional trigger and Switch translations associated with the End User Customer's telephone number will not be removed, nor will Qwest disconnect the Customer's Billing and account information, until 11:59 p.m. (local time) of the next business day after the Due Date. CLEC is required to make timely notification of Due Date changes or cancellations by 8:00 p.m. mountain time on the Due Date through a supplemental LSR order. In the event CLEC does not make timely notification, CLEC may submit a late notification to Qwest as soon as possible but in no event later than 12:00 p.m. mountain time the next business day after the Due Date to Qwest's Interconnect Service Center in the manner set forth below. For a late notification properly submitted, Qwest agrees to use its best efforts to ensure that the End User's service is not disconnected prior to 11:59 p.m. of the next business day following the new Due Date or, in the case of cancellation, no disruption of the End User's existing service. Late notifications must be made by calling Qwest's Interconnect Service Center followed by CLEC submitting a confirming supplemental LSR order. [117]

The only remaining issue raised by AT&T is its objection to the "try to" language Qwest proposed in Arizona. As demonstrated above, that language is not in the South Dakota SGAT. Qwest included in the SGAT *prior to the hearing* to answer AT&T's concern, and AT&T has

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[117] *In re U.S. West Comm. Inc.'s Compliance with Section 271 of the Telecomm. Act of* 1996, Docket No. T-00000A-97-0238, Decision No. 64629, (Az. Corp. Comm'n March 15, 2002) at 8-9, ¶ 35.Qwest agreed to bring this language into South Dakota during the April, 2002 Hearings.

not even commented on any perceived problems with the resolution.[118] Qwest has committed to make its best effort to accommodate a CLEC's needs. No other party has expressed concern over the language in the SGAT or a defect in Qwest's commitment to the disconnect solution. The issues put forth by AT&T have been completely answered. AT&T's continued advocacy in this Checklist Item in essence relates to yesterday's problems, not current solutions or performances. Qwest submits that it is in full compliance with Checklist Item 11.

M. Qwest is in Full Compliance with Checklist Item 12 (Local Dialing Parity).

Because no party has substantively challenged Qwest's compliance with Checklist Item 12, the Commission should likewise find Qwest to be in compliance.

N. Qwest is in Full Compliance with Checklist Item 13 (Reciprocal Compensation).

Because no party has substantively challenged Qwest's compliance with Checklist Item 13, the Commission should likewise find Qwest to be in compliance.

O. Qwest is in Full Compliance with Checklist Item 14 (Resale)

Because no party has substantively challenged Qwest's compliance with Checklist Item 14, the Commission should likewise find Qwest to be in compliance.

P. Qwest's Commercial Performance Data Demonstrates that it is Providing Each Item on the Competitive Checklist to CLECs at an "Acceptable Level of Quality."

Qwest submitted a separate brief on commercial performance to demonstrate that it is providing each checklist item at an acceptable level of quality.[119] In its brief, Qwest presented

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[118] The language of SGAT Section 10.2.5.3.1 was included in the Rebuttal Affidavit of Margaret S. Bumgarner (Qwest Ex. 39) at 17. It included the language AT&T asserts is missing and the compromise language AT&T requests be changed.

[119] *See* Qwest Corporation's Opening Post-Hearing Brief on Performance (PIDs, Actual Performance, and Data Reconciliation).

evidence and results regarding PIDs, actual performance and data reconciliation. None of the parties have submitted any responsive brief challenging Qwest's commercial performance.

The FCC has determined a well-defined approach toward evaluating performance data in section 271 applications. The FCC places tremendous emphasis on PIDs negotiated through an open process, such as occurred in the ROC. The FCC concluded that when "[performance] standards are developed through open proceedings with input from both the incumbent and competing carriers, these standards can represent informed and reliable attempts to objectively approximate whether competing carriers are being served by the incumbent in substantially the same time or manner or in a way that provides them a meaningful opportunity to compete."[120] Perfection is not required. Instead, the Commission assess all of the PIDs for each checklist item in totality and decides whether Qwest's performance is adequate. Moreover, Liberty Consulting, the independent third-party hired by the ROC to audit and reconcile Qwest's performance data, has twice concluded that Qwest's performance data is "accurate and reliable." Thus, a review of Qwest's performance data demonstrates that Qwest is providing an acceptable level of quality with respect to each checklist item.

III. CONCLUSION

For the foregoing reasons, and those set forth in Qwest's testimony, exhibits, and prior briefs, the Commission should recommend that Qwest meets the requirements of all Checklist Items in South Dakota.

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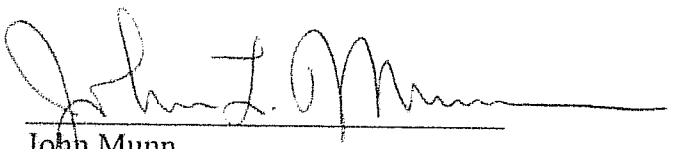
[120] *Verizon Massachusetts Order* at ¶ 13.

Dated this 16th day of July, 2002.

Respectfully Submitted,



John Munn
Qwest Corporation
1801 California Street, Suite 4900
Denver, Colorado 80202
(303) 672-5823

Attorney for Qwest Corporation

BEFORE THE
PUBLIC UTILITIES COMMISSION
STATE OF SOUTH DAKOTA

RECEIVED
JUL 17 2002
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE ANALYSIS OF	)	
QWEST CORPORATION'S COMPLIANCE	)	
WITH SECTION 271 (C) OF THE	)	**DOCKET TC 01-165**
TELECOMMUNICATIONS ACT OF 1996	)	

QWEST CORPORATION'S REPLY BRIEF IN SUPPORT OF THE QPAP

July 16, 2002

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BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE ANALYSIS OF QWEST CORPORATION'S COMPLIANCE WITH SECTION 271 (C) OF THE TELECOMMUNICATIONS ACT OF 1996	)))))	**DOCKET TC 01-165**

QWEST CORPORATION'S REPLY BRIEF IN SUPPORT OF THE QPAP

Qwest Corporation ("Qwest") respectfully submits this reply brief in support of the revised Qwest performance assurance plan ("QPAP"), submitted as Qwest Exhibit 82 with Qwest's opening brief.

INTRODUCTION

Neither of the South Dakota CLECs argues that the revised QPAP provides insufficient incentive for Qwest to maintain its wholesale performance at acceptable levels, or otherwise falls outside the FCC's "zone of reasonableness." Midcontinent Communications ("Midcontinent") offers no criticism of the QPAP at all; indeed, it specifically endorses the plan's principle of liquidated damages.[1] Similarly, apart from the scope of the six month review of the plan addressed below (the revised version of which it does not address), Black Hills FiberCom, LLC ("FiberCom") raises no substantive concerns about the QPAP. Its questions about successor liability, arbitrability of disputes, and delays in implementing the plan are addressed below.

The only party that addresses the substantive provisions of the revised QPAP is the Commission Staff ("Staff"). The Staff's brief makes virtually no effort to address the

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[1] Midcontinent's Post Hearing Brief, *In the Matter of the Analysis into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996*, July 1, 2002, at 11.

evidence in the record described in Qwest's opening brief, or even the changes made in the revised QPAP to meet the Staff's concerns; instead, it hews to the single theme that more is always better. If accepted, that theme would place this Commission far at odds both from what has been deemed acceptable to the FCC and from logic and record support (particularly on critical questions such as the acceptability of any annual cap on liability and "stuck duration").

AT&T simply offers the Commission a highly selective list of menu options taken from orders in other states, which are divorced from their whole context and which ignore the dynamic process by which those options were derived.[2] While Qwest would have no objection should this Commission choose to endorse the QPAP that has met the concerns of both AT&T and Qwest in North Dakota (and is currently on review by the FCC), the Commission should reject AT&T's suggestion that it "pick and choose" from among menu options plucked from other state plans without any understanding of the meaning, rationale or relationship with other terms and conditions of those plans.

I. STAFF'S CRITICISMS OF THE REVISED QPAP ARE UNJUSTIFIED.

The Staff's single-minded approach to the QPAP would misdirect the Commission down a path toward irrelevance. Indeed, while we address below the Staff's objections to particular provisions of the revised QPAP, we note at the outset that the Staff's arguments extend well beyond mere disagreements about the FCC's "zone of reasonableness" applicable to this proceeding.

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[2] *Cf.* Staff's Brief, *In the Matter of the Analysis into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996*, July 1, 2002, at 18 ("Staff Br.") (criticizing Qwest for "introduc[ing] evidence into the South Dakota record that apparently exists in another state's Section 271 record").

The Staff repeatedly refuses to address the record evidence in support of these provisions described in Qwest's opening brief, characterizing this as "playing games by taking testimony out of context."[3] It fails to recognize the significant post-hearing changes made by Qwest (and reflected in Qwest Exhibit 82) to certain QPAP provisions that the Staff originally opposed -- such as the Tier 2 trigger, the six month cap on escalation, and the use of 1999 ARMIS data for the annual cap. And it would have this Commission isolate itself by recommending QPAP provisions (such as the absence of an annual cap and the use of "stuck duration") ultimately endorsed by only the Wyoming Commission, and by no other commission in Qwest's region.[4]

Staff either ignores the FCC's views (such as on the Tier 2 trigger) or asserts that they are "totally unsupported,"[5] and that "nobody knows what the FCC will or will not do given noncompliance."[6] It does so while simultaneously assuring the Commission that "the Staff is not recommending that the Commission reject anything that has been done previously by the FCC."[7] The Staff then encourages this Commission to depart from what the FCC repeatedly has approved, in what the Staff chooses to refer to as the "infamous" Texas plan, because it claims that "state-specific needs" in South Dakota are different from those in Texas -- or Arkansas, or Kansas, or Missouri, or Oklahoma.[8] Yet

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3 Staff Br. at 18. *See also id.* at 29-30 (ignoring Staff's own testimony).

4 The Wyoming QPAP filed with the FCC on July 12, 2002, does not include these provisions recommended by the Wyoming Commission.

5 *Id.* at 24.

6 *Id.* at 27.

7 *Id.* at 21.

8 *Id.* at 22. The Staff also suggests that the FCC's endorsement of the Texas plan involved "the results of a proceeding that took place more than 48 months ago in Texas." Staff Br. at 22. In fact, the Texas Commission approved SBC's application in December 1999. Memorandum Opinion and Order, *Application by SBC Communications Inc., Southwestern Bell Telephone Company, And Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the*

it does so in the face of the concession by its witness that "I don't think there's anything specific about a smaller state" and that "I would probably come to the same recommendation in New York as I did in South Dakota."[9]

The Staff also begins with the premise that the QPAP must be as onerous as possible -- more stringent than any plan previously approved by the FCC. Indeed, for the Staff that appears to be the *only* consideration,[10] even though the FCC has recognized (like the Multistate Facilitator)[11] that "balance [of] opposing concerns" is an appropriate aspect of performance assurance plans.[12] The Staff's analysis here lacks any such balance, which as Qwest has noted is vital not simply to establish some degree of financial certainty to Qwest for the undertaking it is proposing, but also to avoid distortion of the marketplace.[13]

The Staff claims that Qwest has "down-played the issue of whether its proposed QPAP is adequate and has sought to minimize review" of its proposed plan.[14] This claim completely ignores the considered showing to the contrary made by Qwest in its opening

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Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Texas, 15 FCC Rcd 18354 ¶ 15 (2000) ("Texas Order"). And the FCC endorsed SBC's identical plans for Arkansas and Missouri in November 2001. Memorandum Opinion and Order, *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Arkansas and Missouri*, 16 FCC Rcd 20719 ¶¶ 128-29 & n.409 (2001) ("Arkansas/Missouri Order").

9 *See* Qwest Corporation's Post-Hearing Brief in Support of the QPAP, *In the Matter of the Analysis into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996*, May 21, 2002, at 4, 13 ("Qwest Br.").

10 *See* Staff Br. at 23 (asserting that FCC criteria do not require "give and take" in creating plan).

11 *See* Qwest Br. at 9.

12 Memorandum Opinion and Order, *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana*, CC Docket No. 02-35, FCC 02-147, ¶ 299 (rel. May 15, 2002) ("Georgia/Louisiana Order").

13 *See* Qwest Br. at 15-17.

14 Staff Br. at 15.

brief. As noted therein, the revised QPAP is now the product of approximately two years of proceedings.[15] Qwest has revised its original Texas-based plan to address concerns raised by the Multistate Facilitator, and by CLECs and commission staffs in South Dakota and other states. The resulting plan is a robust one that more than complies with the FCC's requirements.

We address below the specific provisions in the revised QPAP challenged by the Staff in its brief.

1. Annual Cap

Qwest's original QPAP placed at risk 36% of its annual net return in South Dakota, as calculated from 1999 ARMIS data. In the revised QPAP, Qwest has agreed to increase the overall cap from 36% to 44%, as well as establish a 24% procedural cap. Under the revised QPAP, to obtain relief from amounts over 24% up to 44%, Qwest has the burden of demonstrating to this Commission its entitlement to relief pursuant to a public interest standard.[16] Qwest has also agreed to update the plan annually with the most recently available ARMIS data.[17]

The Staff's claim -- that Qwest's revised cap is still insufficient and that *there should be no cap at all* -- is beyond the pale. In application after application, the FCC has approved an absolute limit on the BOC's annual liability under the plan.[18] The FCC

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15 Qwest Br. at 5-8.

16 Revised QPAP §§ 12.1 to 12.2.

17 *Id.* § 12.1; *see also* Rebuttal Affidavit of Mark S. Reynolds, *In the Matter of the Analysis into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996*, April 2, 2002, at 10-11 (Qwest Ex. 78).

18 *See* Memorandum Opinion and Order, *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, 15 FCC Rcd 3953 ¶ 435 (1999) *aff'd sub nom. AT&T v. FCC*, 220 F.3d 607 (D.C. Cir. 2000) ("Bell Atlantic New York Order"); *Texas Order* ¶ 424; Memorandum Opinion and Order, *Joint Application*

has repeatedly found that placing 36% of the BOC's net local revenues at risk constitutes a "meaningful incentive" to maintain a "high level" of performance, because "it is primarily [the BOC's] local service profits that [it] would have a theoretical incentive to 'protect' by discriminating against competing local carriers."[19]

Staff concedes this point.[20] It first responds that the Commission should require updated ARMIS measurements for the caps (which the revised QPAP does). It then tries to contort the FCC's recognition of *additional* incentives for BOC performance into an "acknowledge[ment] that it is uncertain as to whether the 36% cap is adequate by going on to say that there are also other remedies available."[21] This is a clear mischaracterization of the FCC's orders. The FCC expressly and unequivocally rejected the assertion that a 36% cap provides an inadequate incentive: "We . . . disagree with commenters that suggest that this amount is insufficient and fails to provide adequate assurance of . . . compliance in the future."[22]

The Staff attempts to dismiss the risk of action by the FCC, noting that South Dakota is a smaller state and suggesting that the FCC may not give South Dakota "the

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by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma, 16 FCC Rcd 6237 ¶ 274 (2001) (subsequent history omitted) ("Kansas/Oklahoma Order"); Memorandum Opinion and Order, *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc. For Authorization To Provide In-Region, InterLATA Services in Massachusetts*, 16 FCC Rcd 8988 ¶ 241 (2001) ("Verizon Massachusetts Order"); Memorandum Opinion and Order, *Application of Verizon New York Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Connecticut*, 16 FCC Rcd 14147 ¶¶ 76-77 (2001) ("Connecticut Order"); *Arkansas/Missouri Order* ¶¶ 128-29 & n.409.

19 *See Bell Atlantic New York Order* ¶¶ 435-36; *Texas Order* ¶ 424 & n.1235; *Kansas/Oklahoma Order* ¶ 274; *Connecticut Order* ¶¶ 76-77; *Arkansas/Missouri Order* ¶¶ 128-29 & n.409.

20 Staff Br. at 24-25 (citing *Bell Atlantic New York Order*).

21 *Id.* at 25-26.

22 *See Kansas/Oklahoma Order* ¶ 274 (footnote omitted).

same level of attention as larger states."[23] But the FCC already has approved plans with similar overall caps in a number of smaller states, most recently Maine and Vermont.[24] Moreover, the FCC has given notice that it will carefully monitor compliance, as it has recently established a section 271 compliance review program. Under that program, "oversight responsibilities are divided according to BOC region, with a dedicated group maintaining responsibility for each region."[25] Staff's concern is belied both by the FCC's compliance program and by its repeated warnings about its willingness to use its section 271(d)(6) enforcement power.[26]

Ultimately, Staff's argument boils down to a contention that Qwest was required to provide a "complex" economic analysis establishing the "marginal cost of compliance."[27] But such a requirement would impose an impossible burden on Qwest. As Mr. Stacy admitted at the hearing, this is not really a marginal cost analysis at all.[28]

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[23] Staff Br. at 27. Staff also notes that in New York, the cap was increased. Staff Br. at 21. But the cap was increased only to 39%, which remains *lower* than the 44% cap here.

[24] Both the Maine and Vermont plans include a 39% cap. Memorandum Opinion and Order, *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc. For Authorization To Provide In-Region, InterLATA Services in Maine*, CC Docket No. 02-61, FCC 02-187 ¶ 61 n.266 (rel. June 19, 2002); Memorandum Opinion and Order, *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc. For Authorization To Provide In-Region, InterLATA Services in Vermont*, CC Docket No. 02-7, FCC 02-118 ¶ 74 n.259 (rel. Apr. 17, 2002).

[25] "FCC's Enforcement Bureau Establishes Section 271 Compliance Review Program," Public Notice, DA 02-1322 (rel. June 6, 2002) at 1.

[26] *See, e.g.*, Memorandum Opinion and Order, *Application by Verizon New Jersey Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services, Inc., for Authorization To Provide In-Region, InterLATA Services in New Jersey*, WC Docket No. 02-67, FCC 02-189, ¶ 179 (rel. June 24, 2002).

[27] *See* Staff Br. at 29-30.

[28] *See* Transcript, *In the Matter of the Investigation into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996* (April 30, 2002) ("Tr. 4/30/02") (Stacy) at 238-39 (admitting that his hypothetical study would actually examine *total* costs rather than *marginal* costs).

and the Multi-state Facilitator "found [such an analysis] to be impossible to perform."[29] Mr. Stacy acknowledged that any such analysis would involve pure "speculation about future revenues," including "speculation about how much of the market Qwest could retain."[30] Moreover, such an analysis would extend far beyond any usual business forecast. It would require Qwest to speculate about the precise extent of liability for CLEC orders whose scope is unknowable and about the prospects of additional regulatory sanctions by the FCC or state commissions. Staff's argument that these problems are "beside the point"[31] comes down to an insistence that Qwest meet an unattainable standard of proof. That would be the essence of arbitrary and capricious agency action.

2. Payment Triggers

As noted above, the Staff criticizes the revised QPAP because it purportedly employs a three-month trigger for Tier 2 payments. Staff is mistaken. Qwest modified the QPAP to accelerate the application of the Tier 2 triggers.[32] First, pursuant to the recommendations of the Multi-state Facilitator, Qwest has agreed that Qwest will also make Tier 2 payments:

- For Tier 2 measures with Tier 1 counterparts, if Qwest misses the performance measure in any two out of three consecutive months in a 12-month period, with respect to the second consecutive month in which Qwest subsequently misses the performance measure.

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29 Stacy Testimony (Staff Ex. 3) at 18; *see* Report on Qwest's Performance Assurance Plan, *In the Matter of the Investigation into US WEST Communications Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, Docket No. D2000.5.70, Oct. 22, 2001 ("Multi-state Facilitator's Report") (Qwest Ex. 28), at 21.

30 Tr. 4/30/02 (Stacy) at 249.

31 Staff Br. at 30.

32 *See* Revised QPAP §§ 9.1.2-9.1.3.

- For Tier 2 measures without Tier 1 counterparts, if Qwest misses the performance measures in any two out of three consecutive months in a 12-month period, with respect to the very next month in which Qwest subsequently misses the performance measure.

In addition, the Facilitator's two-out-of-three-consecutive-month trigger for Tier 2 payments described above is removed if Qwest's overall conforming performance level falls below 85% for any five months out of a 12-month period. In that event, Tier 2 payments will be triggered the very next month of noncompliance with measures that do not have Tier 1 counterparts and upon two months of subsequent noncompliance for measures that do have Tier 1 counterparts.[33] Thus, the three-month triggers criticized by Staff are simply not part of the revised QPAP.[34] As explained above, under the revised QPAP, Qwest may be required to make Tier 2 payments in the very next month of noncompliance with a performance measure if Qwest has missed the performance measure in the past.

Tier 2 payments should be triggered only to incent Qwest to solve the problem once it has an opportunity to do so. Performance results are not known until almost 30 days after the end of the month to which the data relates. Thus Qwest may not be aware that it has missed a performance measurement until the end of the next month. Because of this time lag, there is a strong possibility that Qwest would experience a two-consecutive-month miss before it ever has a reasonable opportunity to take steps to fix the problem. Thus, the revised QPAP trigger for Tier 2 payments is a reasonable measure to create an appropriate incentive for Qwest. In any event, Staff fails to provide

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[33] *See* Revised QPAP §§ 9.1.2-9.1.3.

[34] Moreover, for Tier 2 payments based on region-wide performance measures, such as gateway measurements, Qwest eliminated the three consecutive month miss requirement and payments are triggered from the first month of noncompliance.

any support for its claim that one-month triggers are necessary to ensure that Qwest will remain in compliance.[35] As AT&T acknowledged, the FCC has approved *three*-month triggers for Tier 2 payments in the Texas, Oklahoma, Kansas, Arkansas, and Missouri performance plans.[36] And, as noted in Qwest's initial brief, in the FCC's recent order approving BellSouth's section 271 application for Georgia and Louisiana, the FCC expressly rejected AT&T's claim that a three-month trigger for such payments was insufficient.[37]

3. Six Month Limit on Escalation

Staff also claims that escalation of Tier 1 payments should be limited after six months. Again, Staff fails to acknowledge that (as explained in Qwest's initial brief[38]) Qwest has revised this provision to address Staff's concerns. Sections 16.2 and 16.3 of the Revised QPAP now permit this Commission to lift the cap on escalation, if it concludes that doing so is in the public interest and that Qwest could have avoided the cap through reasonable and prudent efforts. However, for escalation beyond 12 months, Qwest would pay any incremental escalation portion to the state, rather than to CLECs.[39] This change preserves the incentives for Qwest to meet the performance measures but

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35 The Staff's assertion that Qwest's position somehow suggests that "consumers are not as important as CLECs" (Staff Br. at 33) is simply absurd. The Staff provides no argument or evidence suggesting that even a three-month Tier 2 trigger would have any impact at all on consumers.

36 *See* Tr. 4/29/02 (Finnegan) at 43; section 9.2 of Texas, Oklahoma, Kansas, Arkansas, and Missouri PAPs.

37 *BellSouth Georgia/Louisiana Order* ¶¶ 297-98. It is important to understand that the original agreement from the PEPP workshop applied the full range of critical values contained in Table 1 to Tier 2 measures, as well as Tier 1 measures. After consulting with the FCC, Qwest agreed that it would not apply **both** the range of critical values *and* a three-month trigger. If the three-month trigger were reduced further, the full range of critical values should rightfully be reinstated.

38 Qwest Br. at 20-25.

39 Revised QPAP § 16.2.

reduces the potential for misuse of escalation to overcompensate CLECs.[40] Under Section 16.4 of the Revised QPAP, any additional escalation portion (above the six-month level) would also be subject to a 10% collar, in order to provide some limit on Qwest's unanticipated financial liability.

To support its argument for unlimited escalation, Staff quotes from a September 2001 order by the Colorado Commission.[41] But the Colorado Commission later revised the escalation provisions of the Colorado plan referred to by the Staff, which now contains certain attributes similar to those in the revised South Dakota QPAP.[42] For example, the CPAP similarly requires that the portion of additional payments resulting from escalation after 12 months should go to the state rather than to CLECs. The CPAP also provides that the Colorado Commission will automatically review any PIDs that continue to trigger escalated payments beyond six months.

It is difficult to understand why Qwest should not be provided with a similar opportunity to demonstrate to the Commission that unending escalation is unnecessary in light of the many possible reasons -- such as new, unanticipated (and perhaps poorly designed) PIDs -- for missing the QPAP's standards in any given case. As Qwest explained in its initial brief, there are numerous reasons why Qwest might miss performance measures, including flaws in the measurements themselves.[43] No party challenged this showing in its brief. The potential for greater escalation imposes a

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40 As Qwest noted in its opening brief, unlimited escalation presents CLECs with an incentive to cause non-compliance because the escalated payments would far exceed what a CLEC would receive if Qwest had complied. *See* Qwest Br. at 23-24.

41 Staff Br. at 34.

42 *See* Decision on Remand and Other Issues Pertaining to the Colorado Performance Assurance Plan, *In the Matter of the Investigation into Alternative Approaches for a Qwest Corporation Performance Assurance Plan in Colorado*, Docket No. 011-41T, at 16-23 (CO Pub. Utils. Comm'n Apr. 10, 2002).

greater burden on Qwest than the six-month cap approved by the FCC in the Texas plan, and fairly addresses Staff's concerns.

In light of the Staff's reliance on the Colorado Commission's decision, it appears clear in any event that the Staff has not recommended elimination of the cap on escalation with respect to billing measures.[44] In analyzing the escalation issue, the Commission should distinguish between payments for billing measures and payments for other measures. No party has objected to a cap on billing measures, and the Colorado Commission retained such a cap so that payments with respect to such measures cannot continue to escalate beyond a maximum payment amount per month.[45] Caps on billing measures are important because, given the nature of billing measurements, single payments to a CLEC could reach extraordinary amounts, resulting in a windfall.[46]

4. Stuck Duration

Relying solely upon the decision by the Wyoming Commission, Staff argues that QPAP payments should remain at escalated levels even after subsequent months of compliance. This "stuck" duration is flatly inconsistent with plans accepted by the FCC, and in fact Wyoming is the *only* state in Qwest's region that ultimately has endorsed it. The Wyoming QPAP filed with the FCC on July 12, 2002 does not include the "stuck" duration provision recommended by the Wyoming Commission.

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43 *See* Qwest Br. at 22-23.

44 *See also* revised QPAP Attachment 2.

45 *See* CPAP § 8.1.

46 Essentially, all three of the billing measures have very large unit volumes that are subject to measurement (BI-1 – individual call records; BI-3 – billed revenues; and BI-4 – total service orders). Even a relatively small percentage of non-conforming performance results in payments for relatively large number of units. Also, non-conforming performance for these measurements rarely directly affects end user customers, as they are based on the billing transactions between Qwest and the CLEC. Further, the effects of any over or under billing will be corrected in subsequent billing cycles.

The Nebraska Commission abandoned a similar approach on reconsideration, noting that "the FCC has repeatedly approved plans submitted by SBC that permit much more accelerated de-escalation of monthly payment levels following months of compliance."[47] That is clearly correct: the SBC plans allow payments to return to the lowest payment level upon a single month of conforming performance. Here, payments step down only one notch at a time for each conforming month of performance.[48]

Staff's response is to ignore Nebraska and all of the other commissions in Qwest's region in favor of Wyoming, for which QSI served as a consultant. This approach does not serve the Commission's interest in ensuring that the QPAP falls within any zone of reasonableness acceptable to the FCC. Moreover, the Staff's characterization of de-escalation as an inappropriate "reward" for meeting the plan's measurements is absurd. Even after doing so, Qwest remains subject to payment levels for noncompliance, with subsequent escalation for continual noncompliance. As the Multi-State Facilitator recognized, sticky duration is "disingenuous because it would ignore entirely successful performance by Qwest however long Qwest provided it [and] is draconian because its new baseline payment levels, when multiplied by the still applicable escalation levels, could produce payments by Qwest that are an order of magnitude higher than those contemplated by the QPAP. . . ."[49]

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[47] Order on Rehearing, *In the Matter of Qwest Corporation, Filing its Notice of Intention to File its Section 271(c) Application with the FCC and Request for the Commission to Verify Compliance with Section 271(c)*, Application No. C-1830, at 5 (NE Pub. Serv. Comm'n May 29, 2002).

[48] Revised QPAP § 6.2.1. The Revised QPAP now permits a form of accelerated de-escalation, but only in connection with eliminating the cap on escalation as described above -- after payments have escalated nine months or more and only after three consecutive months of conforming performance. Revised QPAP § 16.3

[49] Multi-state Facilitator's Report (Qwest Ex. 28) at 63.

5. Six-Month Review

Staff argues that "[t]he Commission has and must retain the capacity to change any element of the plan as needed for our state."[50] Staff fails to discuss at all the revised QPAP, which attempts to strike a balance between the Commission's need for a flexible plan with Qwest's need for a reasonable degree of certainty. Section 16.1 provides for a review of the QPAP every six months to determine whether performance measurements should be added, deleted or modified and whether the applicable standards or classifications of the measurements should be altered.[51] The revised QPAP would continue to prevent the basic architecture of the plan from being changed at the six-month review but would permit the Commission (subject to judicial review) to resolve any disputes concerning the addition, deletion, modification, or reclassification of the measurements.[52] In order to provide Qwest with some financial certainty with regard to changes made at the six-month review, this compromise includes a "collar" to limit Qwest's liability resulting from any changes arising out of the review to 10% of the total monthly payments that Qwest would have made in lieu of such changes.[53] This is an

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50 Staff Br. at 36.

51 The original QPAP proposed by Qwest provided that "[c]hanges shall not be made without Qwest's agreement," except that disputes regarding the addition of new performance measurements were to be resolved by arbitration. This provision was modeled on the Texas plan and its progeny. *See* Texas PAP § 6.4; *see also* § 6.4 of the Kansas, Oklahoma, Arkansas, and Missouri PAPs.

52 Revised QPAP § 16.1. Staff claims that the Commission must have authority to modify the QPAP to protect smaller CLECs in South Dakota. However, based on recommendations by the Multi-State Facilitator (*see* Multi-State Facilitator's Report at 58-59, 67-68), Qwest already has modified the QPAP to serve the interests of smaller CLECs by providing for minimum annual payments (*see* revised QPAP § 6.4) and by altering the "rounding" mechanism to ensure that Qwest does not enjoy a lower performance standard with respect to CLECs with low order volumes (*see* revised QPAP § 2.4).

53 *Id.*

appropriate "balance"[54] that gives some permanence to the basic structure of the QPAP while allowing the plan to change and appropriately evolve.

6. Offset

The Staff argues that the QPAP should include the offset language recently adopted in North Dakota and Nebraska (which are essentially identical to each other). As Qwest explained in its initial brief, this is unnecessary because (contrary to Staff's assertion) Section 13.7 of the revised QPAP does *not* permit Qwest to make any offset determination by itself.[55] However, as noted below, Qwest is willing to conform the offset provision to the language in the North Dakota QPAP, since AT&T has endorsed that language.

II. THE REVISED QPAP ADDRESSES FIBERCOM'S ADDITIONAL CONCERNS

As noted above, FiberCom raises only a handful of minor additional issues concerning the QPAP, a number of which are based on a misunderstanding of the provisions of the revised QPAP.

1. Revisions to the QPAP

FiberCom expresses concern that, at the hearing, it was not clear whether the QPAP reflected all of the compromises to which Qwest had agreed.[56] This concern is difficult to understand, since the revised QPAP filed with Qwest's opening brief (Qwest

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54 *Georgia/Louisiana Order* ¶ 299.

55 *See* Qwest Br. at 42-43.

56 Intervenor Black Hills FiberCom, L.L.C.'s Response to Qwest Corporation's Post-Hearing Brief, *In the Matter of the Analysis into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996*, July 1, 2002, at 14 ("FiberCom Br.").

Exhibit 82) had already answered the question by plainly incorporating the agreed changes.

2. Successor Liability

FiberCom requests that the QPAP make clear that any successor to Qwest is bound by the terms of the QPAP.[57] Qwest is not aware of any plan in any other state that has contained such a provision, and it is not required by the FCC. Moreover, successor liability is addressed in Section 5.12 of the SGAT.

3. Audit Protection

FiberCom argues that "[t]he QPAP should provide sufficient audit protections to extend the sunset provision provided for in 47 USC § 271(f) beyond the statutory 3-year period."[58] But the statutory provision in question -- actually § 272(f), not § 271(f) -- does not apply to audits performed under the QPAP. That provision applies only to audits conducted under § 272(d) to ensure that a company has complied with the separate affiliate requirements of § 272 for long distance service, not the checklist compliance requirements applicable to local markets.

4. Applicability of the QPAP to All South Dakota CLECs.

FiberCom requests that the QPAP be made available to all South Dakota CLECs without requiring them to adopt the QPAP as part of their interconnection agreement. FiberCom apparently is concerned that negotiations for an amendment to implement the QPAP could be drawn out. In order to ensure that the amendment process is expeditious, Qwest has no objection to preparing a model amendment for CLECs that simply

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[57] FiberCom Br. at 15.

[58] FiberCom Br. at 15.

incorporates the QPAP and any other provisions from the SGAT that are necessary for implementation of the QPAP, such as § 20, which contains the Performance Indicator Definitions.

5. Dispute Resolution

FiberCom also raises concerns that the dispute resolution provision, section 5.18 of the SGAT (also incorporated in the QPAP) would allow a party to avoid dispute resolution before the Commission by requesting arbitration.[59] But as demonstrated in Qwest's reply brief on the General Terms and Conditions, section 5.18 does not deprive any party of the right to seek Commission resolution of a dispute about the interpretation of the QPAP. Though Qwest is free to request arbitration, that request for arbitration is not binding on the CLEC. Thus, a CLEC that wants to avoid arbitration in Denver may simply seek dispute resolution before this Commission.

III. OTHER STATE PLANS

As AT&T observes, there has been substantial progress towards approval of the QPAP by other state commissions and the FCC since the filing of Qwest's post-hearing brief before this Commission. Qwest also has now filed its application for 271 authority with the FCC for nine states in its region.

As Qwest has demonstrated, the revised South Dakota QPAP (Qwest Exhibit 82) is a robust plan that lies well within the FCC's zone of reasonableness. However, without waiver of its right to have the Commission consider the evidence and recommendations in the record before it, and in order to come to an acceptable closure on

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[59] FiberCom Br. at 9-13. FiberCom is concerned that, when a dispute arises, a party may request arbitration after three days but must wait seven days before requesting dispute resolution in front of the

the South Dakota QPAP, Qwest would not oppose the adoption of a plan that has been approved by another state commission and is pending before the FCC in support of Qwest's section 271 application -- so long as it is adopted in its entirety.

Because AT&T has agreed to many aspects of the North Dakota QPAP, that plan provides the Commission with an option that should not be controversial. AT&T has stated that it believes the three "most fundamental issues" regarding the QPAP are the provisions relating to election of remedies, offset of recoveries, and the six-month review.[60] As the North Dakota Commission has recognized, AT&T recently agreed with Qwest on the QPAP language for North Dakota relating to election of remedies and offset.[61] Under those provisions, if a CLEC elects the QPAP, it does so in lieu of other alternative contractual standards and remedies, and payments are treated as liquidated damages. A CLEC is not foreclosed from pursuing noncontractual remedies.[62] The QPAP expressly acknowledges that Qwest may seek an offset of awards under noncontractual claims. Before the Washington Commission, AT&T also indicated its willingness to accept the six-month review provision of the North Dakota plan.[63] And it

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Commission. Because the request for arbitration is not binding in the absence of mutual agreement, this timetable is no bar to a party seeking to avoid arbitration.

[60] AT&T's Responsive Post-Hearing Brief to "Qwest Corporation's Post-Hearing Brief in Support of the QPAP" and Request for Additional Supplementation of the Record, *In the Matter of the Analysis into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996*, at 10, 12 (June 28, 2002).

[61] *See* Interim Consultative Report on Qwest's Performance Assurance Plan, *US West Communications, Inc. Section 271 Compliance Investigation*, at 17-20 (May 22, 2002) ("ND Interim Consultative Report").

[62] For the convenience of the Commission, a copy of the North Dakota QPAP is attached hereto as Qwest Exhibit 93. The liquidated damages, election of remedies and offset provisions are found in §§ 13.5-13.7 of the North Dakota QPAP.

[63] *See* Joint Comments on Qwest's QPAP Compliance Filing, *In the Matter of the Investigation into US WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, Docket No. UT-003022 at 5-6 (WA Utils. and Transp. Comm'n June 3, 2002) (endorsing and attaching § 16.1 of North Dakota QPAP); June 5, 2002 Hearing Transcript, Before the Washington Utilities and Transportation Commission, *In the Matter of the Investigation into US WEST Communications, Inc.'s*

has confirmed the acceptability of that provision in its recent comments to the FCC, which do not challenge it.[64] The North Dakota provision neither grants nor precludes the Commission from exercising its independent authority.

CONCLUSION

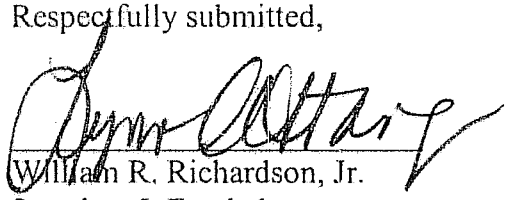
For the reasons stated above, the Commission should recommend that the FCC approve Qwest's QPAP as falling within the FCC's zone of reasonableness. Alternatively, the Commission may consider recommending adoption of the North Dakota version of the QPAP, with the annual cap revised to account for South Dakota ARMIS data.

Compliance with Section 271 of the Telecommunications Act of 1996, Docket No. UT-003022 at 7916-7917 (WA Utils. and Transp. Comm'n June 5, 2002) (finding 10% collar unobjectionable).

[64] *See* Comments of AT&T Corp., WC Docket No. 02-148, at 142-46 (July 3, 2002).

Dated this 16th day of July, 2002.

Respectfully submitted,



William R. Richardson, Jr.
Jonathan J. Frankel
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037-1420
(202) 663-6038

Lynn Anton Stang
1801 California Street, Suite 4900
Denver, CO 80202
(303) 672-5823

Attorneys for Qwest Corporation

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
JUL 17 2002
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE ANALYSIS INTO QWEST CORPORATION'S COMPLIANCE WITH SECTION 271 (c) OF THE TELECOMMUNICATIONS ACT OF 1996	))))	DOCKET TC 01-165

QWEST CORPORATION'S POST-HEARING REPLY BRIEF ON GENERAL TERMS AND CONDITIONS, SECTION 272, AND TRACK A

July 16, 2002

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I. INTRODUCTION

Qwest is in full compliance with all issues related to general terms and conditions and meets all requirements of Track A. It is likewise clear that, upon receiving section 271 approval, Qwest will be fully compliant with the requirements of section 272.

The record is clear that issues raised by Midcontinent Communications ("Midco") and Black Hills FiberCom ("FiberCom") on general terms have been fully addressed by Qwest.

On Section 272, AT&T, even though it did not participate in the hearing, makes a belated effort to introduce arguments that have been completely discredited by other state commissions that have addressed Qwest's section 272 compliance. Indeed, all state commissions that have issued final rulings on section 272 issues have found Qwest to be compliant.

Finally, the arguments advanced by Midco and FiberCom on Track A issues are irrelevant, ignore federal law, and the nature of Qwest's SGAT.

II. DISCUSSION

A. THE GENERAL TERMS AND CONDITIONS WITHIN QWEST'S SGAT ARE BALANCED AND APPROPRIATE

Only two parties, Midcontinent Communications ("Midco") and Black Hills FiberCom, L.L.C. ("FiberCom"), raised issues concerning the general terms and conditions of Qwest's statement of generally available terms (SGAT) in record testimony and evidence.

Midco. Based on a mailing that Midco said that one of its customers had received from Qwest, Midco expressed concern that Qwest had improperly used confidential Midco customer records. Qwest investigated this issue and addressed it in the Supplemental Affidavit of Larry B.

Brotherson and its Opening Brief.[1] As shown in Qwest's Opening Brief, the only mailing introduced by Midco into the record on this point was addressed to Midco's Telecommunications Manager, not a customer of Midco.[2] In response, Midco acknowledges that "Qwest has an explanation that would indicate that competitive information was not misused."[3] Midco continues to question, though, the form of Qwest's mailing and particularly the envelope, which bore Midco's reseller identification number. As Qwest previously explained, however, Midco is a retail customer of Qwest, and it is not surprising that it would receive Qwest's promotional brochure.[4] Qwest's use of Midco's reseller number on correspondence from Qwest to Midco not does constitute misuse of any competitive information. Qwest respectfully requests that the Commission close this issue with a finding that Qwest has not misused confidential information.

FiberCom. FiberCom continues to raise four related issues concerning SGAT section 5.18, Dispute Resolution: (1) Whether this section compels arbitration of the dispute if one party does not agree to arbitrate; (2) whether section 5.18.3 appropriately compels arbitration in Denver if the parties do not agree upon another location; (3) whether section 5.18.3.2 improperly limits the scope of discovery in an arbitration; and (4) whether section 5.18.5, as revised, still modifies the applicable statute of limitations.[5] Other than one revision to the revised version of section 5.18.5, Qwest believes any further modifications to the dispute resolution provisions of the SGAT are unnecessary.

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[1] *See* Qwest Corporation's Opening Post-Hearing Brief on General Terms and Conditions, Section 272, and Track A ("Qwest Brief") at 13-18.

[2] *Id.* at 13-14.

[3] MidContinent's Post Hearing Brief ("Midco Brief") at 9.

[4] Qwest Brief at 15-16.

[5] Intevenor Black Hills FiberCom, L.L.C.'s Response to Qwest Corporation's Post-Hearing Brief ("FiberCom Brief") at 8-14.

First, as Mr. Brotherson repeatedly explained in his testimony, and as Qwest explained in its opening brief, section 5.18 simply permits either party to request arbitration.[6] An arbitration cannot be compelled over the objection of a party. Either party's right to bring a dispute before this Commission is fully preserved. FiberCom's fear that Qwest might get a head start in arbitration and use that head start to compel an unwilling CLEC to arbitrate is groundless in light of the unequivocal language within section 5.18.1 in which "each party reserves its rights to resort to the Commission or to a court, agency or regulatory authority of competent jurisdiction." The existing SGAT language does not require modification.

Second, the existing language in section 5.18.3 concerning the location of the arbitration is appropriate. No other CLEC has objected to this consensus language, and there is no evidence that the location of the arbitration has ever given rise to any dispute.[7]

Third, FiberCom raises a fear that an arbitrator may cut short discovery of documents that are of "moderate or marginal relevance but might lead to discovery of relevant evidence."[8] As Qwest explained in its opening brief, expedited procedures and treatment of discovery are reasons why businesses elect arbitration in the first place.[9] Section 5.18.3.2 provides that the arbitrator shall resolve any disputes regarding the need, scope, manner and timing of discovery. If FiberCom or any other party is uneasy about the limited discovery available in arbitration, it is free to go instead to the Commission or court. Again, Qwest respectfully submits no modifications are appropriate.

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[6] *See* Qwest Brief at 20.

[7] *Id.*

[8] FiberCom Brief at 13.

[9] Qwest Brief at 20-21.

Fourth, FiberCom expresses concern that its latest version of section 5.18.5 still leaves some confusion as to the effect of South Dakota's statutes of limitation.[10] Although Qwest believes that FiberCom's concern is groundless, it is willing to further amend this section to make the continued applicability of South Dakota's statute of limitations crystal clear:

> No dispute, regardless of the form of action, arising out of this agreement, may be brought by either Party more than two (2) years after the cause of action accrues, ~~or~~ as unless otherwise provided under South Dakota law.

With this change, Qwest respectfully requests that the Commission adopt the recommendations of the Multi-state Facilitator and Staff concerning the appropriateness of the general terms and conditions of the SGAT.

B. AT&T's BELATED EFFORT TO INTRODUCE SECTION 272 ISSUES INTO THE RECORD SHOULD BE REJECTED AND IS IN ANY EVENT WITHOUT MERIT.

In its opening brief, Qwest demonstrated that it has established an affiliate, Qwest Communications Corp. ("QCC"), that will comply with each of section 272's separation requirements. No party that either presented testimony on section 272 or cross-examined Qwest's section 272 witnesses has disagreed. Neither of the South Dakota CLECs that attended the hearing raised any objections to Qwest's showing of compliance, and the South Dakota Staff agrees that "Qwest has demonstrated that it will comply with the requirements of section 272."[11]

The Staff's conclusion mirrors that of *every* commission that has issued findings on section 272. As Qwest pointed out in its opening brief, at that time seven of the thirteen other commissions

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[10] FiberCom Brief at 13-14.

[11] *See* Staff's Brief, May 20, 2002, at 40.

in its region had already found that it complies with section 272.[12] Since Qwest's opening brief was filed, four other commissions — Idaho,[13] Oregon,[14] Utah,[15] and Wyoming[16] — have reached the same conclusion. An administrative law judge in Arizona has also just recently endorsed the Arizona Staff's recommendation that the commission in that state also find Qwest in compliance with section 272.[17]

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[12] *See* Qwest Brief at 26-27 (describing approval of Qwest's section 272 application by Nebraska, New Mexico, Washington, Colorado, Iowa, Montana, and North Dakota). Since Qwest submitted its opening brief, the two of these seven states that had yet to finalize their orders, North Dakota and Washington, have both finalized their approvals of Qwest's section 272 showing. *See* 39th Supplemental Order Approving SGAT and QPAP and Addressing Data Verification, Performance Data, OSS Testing, Change Management, and Public Interest, *In the Matter of the Investigation Into U S West Communications, Inc.'s Compliance With Section 271 of The Telecommunications Act of 1996; In the Matter of U S West Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of The Telecommunications Act of 1996*, Docket Nos. UT-003022 & UT-003040, July 1, 2002, ("Washington Final Order") at 1; Consultative Report of the North Dakota Public Service Commission, *U S WEST Communications, Inc. Section 271 Compliance Investigation*, Case No. PU-314-97-193 ("July 1, 2002") at 180-96.

[13] Commission Final Decision on Qwest's Corporation's Compliance with Section 271, *In the Matter of U S West Communications, Inc.'s Motion for an Alternative Procedure to Manage its Section 271 Application* Case No. USW-T-00-3 (June 10, 2002) at 5-6.

[14] Disposition: Workshop 4, Part 2 Findings and Recommendation Report of the Commission and Procedural Ruling, *In the Matter of Investigation Into the Entry of Qwest Corporation, formerly known as U S WEST COMMUNICATIONS, INC. into In-Region InterLATA Services under Section 271 of The Telecommunications Act of 1996*, Docket No. UM 823 (Jun. 3, 2002) ("Oregon Order"), at 47-57.

[15] Final Order Regarding Qwest 271 Compliance, *In the Matter of the Application of Qwest Corporation for Approval of Compliance With 47 U.S.C. § 271(d)(2)(B)*, Docket No. 00-049-08 (Jul. 8, 2002) ("Utah Order) at 6.

[16] Order on Group 5 Workshop Items: Section 272, Track A, and General SGAT Terms and Conditions, *In the Matter of the Application of Qwest Corporation Regarding Relief under Section 271 of the Federal Telecommunications Act of 1996, Wyoming's Participation in a Multistate Section 271 Process, and Approval of its Statement of Generally Applicable Terms*, Docket No. 70000-TA-00-599 (Jun. 19, 2002) at 1-4; Order on Consideration of General Compliance, *In the Matter of the Application of Qwest Corporation Regarding Relief under Section 271 of the Federal Telecommunications Act of 1996, Wyoming's Participation in a Multistate Section 271 Process, and Approval of its Statement of Generally Applicable Terms*, Docket No. 70000-TA-00-599 (Jul. 3, 2002) ("Wyoming Order") ¶ 32.

[17] *See* Order, *In The Matter Of U. S. West Communications, Inc.'s Compliance With Section 271 Of The Telecommunications Act Of 1996*, Docket No. T-00000A-97-0238, (Ariz. Corp. Comm'n April 19, 2002), ¶ 35 ("Arizona Order"). Other than Arizona, the only other state where the commission has not yet issued findings on section 272 is Minnesota. As Qwest noted in its opening brief, an administrative law judge in that state has found that Qwest has satisfied a number of section 272's requirements — including 272(b)(2)'s

(continued...)

In the face of these resounding and repeated rejections of its position, AT&T continues to maintain that Qwest has failed to make an adequate section 272 showing. Its protest is half-hearted at best: AT&T did not even provide a witness on 272 issues for the hearing, and it has not offered any response to Qwest's particularized showing of compliance in its opening brief. AT&T instead simply states that it "continues to adhere to the positions" submitted with its prehearing comments,[18] which were never verified or entered into the record. This tactic should not be credited. But as we show below, AT&T's positions are untenable in any event. Every one of the foregoing commissions has squarely rejected AT&T's arguments on section 272 that it is now attempting to recycle for this proceeding.

1. Section 272(a): QCC is a "Separate" Affiliate.

AT&T has never really argued that Qwest and QCC are not in compliance with section 272(a). Indeed, any such argument would fly in the face of myriad state commission conclusions that Qwest is fully compliant with this requirement.[19] Instead, AT&T recycles three good faith

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accounting requirements and section 272(b)(4)'s requirement that the creditors of the 272 affiliate not have recourse to BOC assets — but stated that Qwest would need to take recommended actions or equivalent measures to comply with other aspects of section 272. As Qwest pointed out in its opening brief, it has filed exceptions to the Minnesota ALJ's recommendations demonstrating that many of these recommendations would impose requirements that go far beyond what the FCC has required of other BOCs and are inconsistent with the FCC interpretations of what section 272 requires. *See* Qwest Brief at 29-30. In any event, the ALJ's recommendations are inconsistent with many of AT&T's arguments here. *See* Rebuttal Affidavit of Marie E. Schwartz re: Section 272 Compliance, filed Apr. 2, 2002, ("Schwartz Rebuttal") (Qwest Ex. 60) at 4, 8.

[18] *See* AT&T's Brief on Checklist Items 2, 5, and 6 and Section 272 Compliance, March 18, 2002 ("AT&T's Pre-filed Comments").

[19] *See* Arizona Order ¶ 35; Utah Order at 6; Wyoming Order ¶ 32; Oregon Order at 47-48 (specifically rejecting AT&T's same argument); Twentieth Supplemental Order, *In the Matter of the Investigation Into U S WEST Communications, Inc.'s Compliance with §271(c) of The Telecommunications Act of 1996*, Docket No. UT-003022 & UT-003040, November 14, 2001, ("Washington Report") ¶ 503; Washington Order at 1; Section 272 Satisfied, *In the Matter of U S WEST Communications, Inc., Denver, Colorado, filing its notice of intention to file its Section 271(c) application with the FCC and request for the Commission to verify US WEST compliance with Section 271(c)*, Application No. C-1830, Sept. 19, 2001 ("Nebraska Order") ¶¶ 8, 24; Final Report on Qwest's Compliance with Section 272 and Responses to Comments Received on Preliminary (continued...)

disputes that Qwest's *predecessor* corporation had about the proper scope of *section 271* as evidence that Qwest will, at some future point, cease complying with *section 272(a)*.[20] AT&T's arguments were wrong the first time they were submitted, and they are no less wrong today.

AT&T's arguments do not even relate to Qwest's efforts to comply with section 272.[21] These three disputes all centered upon the scope of the term "provide" as used in section 271. The South Dakota staff has concluded not only that "QC and QCC meet the separate ownership test of Section 272," but also that "the three cases cited by AT&T are not evidence to warrant drawing a conclusion of Section 272 failure."[22] This analysis is confirmed by other state commissions. As the Multi-state Facilitator recognized, these prior 271 disputes in no way contradict Qwest's commitment to abide by the separation requirements where (as here) it is seeking 271 approval.[23] Every state commission to have considered whether Qwest meets section 272(a)'s separation requirements has found Qwest compliant.[24] As the Colorado Hearing Commissioner found, these instances discussed by AT&T are "ultimately irrelevant when it comes to deciding whether Qwest meets the separate

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Report, *In the Matter of the Investigation Into Qwest Corporation's Compliance with Section 271 of The Telecommunications Act of 1996,* Docket No. D2000.5.70, May 8, 2002, at 4-7 ("Montana Order"); Order on Staff Volume VII Regarding Section 272, The Public Interest, and Track A, *In the Matter of the Investigation Into U S WEST Communications, Inc.'s Compliance with § 271(c) of The Telecommunications Act of 1996,* Docket No. 971-198T, Decision No. R02-318-I, Mar. 15, 2002, ("Colorado Order") ¶¶ D-6-7.

[20] *See* AT&T's Pre-filed Comments at 13-18.

[21] *See* Schwartz Rebuttal (Qwest Ex. 60) at 5-6.

[22] Direct Testimony of Marlon Griffing, March 18, 2002 ("Griffing Direct") (Staff Ex 1) at 122-24.

[23] Multi-state General Terms and Conditions, Section 272, and Track A Report (Sept. 21, 2001) ("General Terms, Section 272, and Track A Report") (Qwest Ex. 26) at 50.

[24] Arizona Order ¶ 35; Utah Order at 6; Nebraska Order ¶¶ 8, 24; Montana Order at 4-7; Colorado Order ¶¶ D-6-7.

subsidiary requirements of § 272(a)," and "ancillary to the primary inquiry here — whether it will provide in-region, interLATA service through a separate affiliate."[25]

2. Section 272(b)(2): QCC Has Separate Books and Records that Will Be Maintained in Compliance with FCC Rules.

Section 272(b)(2) provides that the 272 affiliate "shall maintain books, records, and accounts in the manner prescribed by the Commission which shall be separate from the books, records, and accounts maintained by the Bell operating company of which it is an affiliate."[26] Qwest demonstrated in its testimony and its opening brief that it and QCC comply with this requirement: QCC has a Chart of Accounts separate from that of the BOC; it has a separate ledger system; and it maintains separate accounting software which is kept at a separate geographic location.[27] Both Qwest and QCC also follow GAAP.[28]

AT&T's arguments to the contrary predate, and are fully answered by, Ms. Schwartz's rebuttal affidavit.[29] These arguments have been rejected by every other commission to address this issue.[30] AT&T's main argument here is to change the subject: rather than discuss the effectiveness of Qwest's current controls, AT&T points to transactions initiated *before* QCC became the 272 affiliate, and before Qwest had finished what AT&T concedes were "enormous efforts" to overlay

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[25] Colorado Order ¶¶ D-6-7.

[26] 47 U.S.C. § 272(b)(2).

[27] Qwest Brief at 32-34.

[28] *Id.* at 33.

[29] *See* Schwartz Rebuttal (Qwest Ex. 60) at 8-13.

[30] *See* Nebraska Order ¶ 26 (finding that Qwest "will comply with Section 272(b)(2)"); Order Regarding Section 272 Compliance, *In the Matter of Qwest Corporation's Section 271 Application and Motion for Alternative Procedure to Manage the Section 271 Process*, Utility Case No. 3269, Feb. 13, 2002, ("New Mexico Order") ¶ 21 (finding Qwest to be in compliance with section 272(b)(2)); Colorado Order at 14 (Qwest

(continued...)

extensive controls on QCC in preparation for making it its new 272 affiliate.[31] As the Multi-state Facilitator noted in his report, AT&T's focus on transactions initiated prior to QCC's becoming Qwest's 272 affiliate in March 2001 "strain[s] the plain language of federal law past the breaking point."[32] In each of their affidavits, and in the hearing, Ms. Schwartz and Ms. Brunsting described the extensive measures that Qwest took to prepare QCC to comply with section 272.[33] As Ms. Schwartz further explained, the independent testing conducted by KPMG and the findings of every commission that has addressed compliance with section 272 confirm that these substantial efforts resulted in a system of controls reasonably designed to assure compliance with section 272(b).[34] Contrary to AT&T's claim that "these reforms have not been tested,"[35] KPMG also verified that the added controls strengthen the overall controls for section 272 compliance and address the issues identified by the KPMG Report.[36]

"has shown that it has satisfied the requirements of § 272(b)(2)" and has been diligent in identifying errors and strengthening its internal controls).

[31] *See* AT&T's Pre-filed Comments at 8.

[32] General Terms, Section 272, and Track A Report (Qwest Ex. 26) at 67.

[33] Direct Affidavit of Marie E. Schwartz, filed Oct. 24, 2001 ("Schwartz Direct") (Qwest Ex. 59); Direct Affidavit of Judith L. Brunsting, filed Oct. 24, 2001 ("Brunsting Direct re: Section 272") (Qwest Ex. 61) at 6-7.

[34] *See* Schwartz Rebuttal (Qwest Ex. 60) at 10-13 & Exs. MES-272-19-23; Tr. 4/24/02 (Schwartz) at 153.

[35] *See* AT&T Pre-filed Comments at 10.

[36] Declaration of Philip J. Jacobsen, KPMG LLP (Dec. 14, 2001) at 23 (attached to Schwartz Rebuttal (Qwest Ex. 60) as Exhibit MES-272-23).

3. Section 272(b)(3) -- Qwest and QCC Have Separate Officers, Directors, and Employees.

Section 272(b)(3) requires the 272 affiliate to have "separate officers, directors, and employees from the Bell operating company of which it is an affiliate."[37] In its opening brief, Qwest has demonstrated its compliance with this requirement.[38]

Again, AT&T merely has recycled its previous allegations that "a revolving door atmosphere" exists between Qwest and QCC that has lead to the "free flow of employees" between Qwest and QCC and the discriminatory sharing of confidential information -- ignoring both the rebuttal testimony and the hearing evidence.[39] These arguments are without factual support, just as the South Dakota staff,[40] the Multi-state Facilitator,[41] and every commission to address the matter has found.[42]

While AT&T condemns employee transfers *per se*, section 272(b)(3) does not bar such transfers. Rather, the statute prohibits only the simultaneous employment of the same personnel by Qwest and QCC.[43] AT&T has conceded as much in other states. Even so, the number of transfers at

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[37] 47 U.S.C. § 272(b)(3).

[38] Qwest Brief at 34-38.

[39] For example, AT&T attacks Qwest and QCC's "employee loan" policy. As Ms. Schwartz testified, there have never been any such loans of employees between the corporations. *See* Schwartz Rebuttal (Qwest Ex. 60) at 16-17. Moreover, Qwest and QCC have implemented a written policy that now prohibits any such loan of employees between them. *Id.* at 17. AT&T has never updated its comments to address these points, which moot AT&T's argument.

[40] Griffing Direct (Staff Ex. 1) at 132-33.

[41] General Terms, Section 272, and Track A Report (Qwest Ex. 26) at 10, 60.

[42] See Arizona Order ¶ 58; Utah Order at 6; Washington Report ¶ 503; Oregon Order at 14-16; Colorado Order ¶ 14-16; Nebraska Order ¶ 13; Montana Order at 28-29; North Dakota Order at 188-90; New Mexico Order ¶ 23. *See also* General Terms, Section 272, and Track A Report (Qwest Ex. 26) at 63-64.

[43] First Report and Order and Further Notice of Proposed Rulemaking, *Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended*, 11 FCC Rcd 21905 ¶ 178 (1996).

issue has been "in the Colorado Chairman's words, 'miniscule.'"[44] As the Multi-state Facilitator concluded, there is no evidence that this small number of transfers was "intended to or actually caus[ed] a compromise of operational independence."[45]

AT&T's initial comments that Qwest and QCC have engaged or will engage in the discriminatory sharing of confidential information also ignore the subsequent rebuttal testimony and hearing record. Qwest already has presented evidence of extensive physical and regulatory safeguards designed to ensure that Qwest and QCC employees comply with the requirements of section 272.[46] In short, Qwest and QCC employees work separately from one another,[47] receive mandatory training on section 272's separation requirements,[48] and are obligated to review and sign the Code of Conduct which explains the separation that must be maintained.[49] Such safeguards against employee sharing of confidential information go beyond those that the FCC found acceptable in prior 271 proceedings, where it squarely rejected arguments of the sort AT&T is recycling here.[50]

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[44] Schwartz Rebuttal (Qwest Ex. 60) at 14, citing Colorado Order ¶ E-14. Ms. Schwartz points out that these transfers involved 149 out of a total of 49,000 employees.

[45] General Terms, Section 272, and Track A Report (Qwest Ex. 26) at 60.

[46] Schwartz Rebuttal (Qwest Ex. 60) at 15 (discussing physical separation between employees, employee training safeguards, and serious disciplinary consequences for violations); Qwest Brief at 35-37 (discussing contractual safeguards in Master Services Agreement and Services Agreement; physical separation between employees, and mandatory employee training regarding employee separation requirements).

[47] Schwartz Rebuttal (Qwest Ex. 60) at 15.

[48] *Id.* at 16.

[49] *Id.*; Qwest Brief at 35-36.

[50] *See* Memorandum Opinion and Order, *Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana*, CC Docket No. 98-121, 13 FCC Rcd 20599 ¶ 345 (1998) ("BellSouth-Louisiana II Order") (describing as "unpersuasive" AT&T's and MCI's arguments that former BOC employees working with the 272 "will serve as improper conduits of confidential information" between the two entities, even with employee training and company rules barring such sharing).

4. Section 272(b)(5) -- Transactions Between Qwest and QCC are At Arm's Length, in Writing, and Publicly Available.

Section 272(b)(5) requires that all transactions between the 272 affiliate and the BOC be at arm's length, reduced to writing, and made available for public inspection.[51] AT&T purports to attack the timeliness of Qwest and QCC's transaction postings, but it never identifies the transactions in question. Again, it ignores the testimony that demonstrates otherwise.[52] Every commission to address this issue has found that Qwest now satisfies this element of section 272(b)(5).[53]

AT&T also claims that Qwest and QCC's transaction postings lack sufficient detail. However, as Ms. Schwartz indicated, Qwest's postings are patterned directly after postings that the FCC already has found to be compliant.[54] Thus, as the New Mexico Commission has found, "Qwest's disclosures generally provide the same level of detail respecting the rates, terms, and conditions of its affiliate transactions that SBC and Verizon provide on their Websites."[55] The Arizona ALJ, too, has recently concluded that "Qwest's postings provide the detail required by the FCC."[56] Moreover, to the degree AT&T attacks Qwest's non-publication of confidential information, AT&T completely misses the mark. Again, the FCC has held that while transactions

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[51] 42 U.S.C. § 272(b)(5).

[52] *See* Tr. 4/24/02 (Schwartz) at 147; Schwartz Direct (Qwest Ex. 59) at 21.

[53] *See* Oregon Order at 54-55 (specifically rejecting AT&T's arguments as to untimely and insufficiently detailed postings); Nebraska Order at 16 (finding that QCC is currently posting transactions on a timely basis and that Qwest LD did so as well); Utah Order at 6. *See also* General Terms, Section 272, and Track A Report (Qwest Ex. 26) at 66-67 (rejecting AT&T's arguments of untimely posting as rooted in "an illogical conception" of when a company becomes a 272 affiliate and stating that KPMG examination shall verify compliance with requirement of timely posting); Montana Order at 30-36 (agreeing with Facilitator); North Dakota Order at 193-94 (agreeing with Facilitator); Colorado Order ¶ G-4 (agreeing with Facilitator and finding that KPMG examination has now demonstrated compliance with Section 272(b)(5).

[54] Schwartz Rebuttal (Qwest Ex. 60) at 19.

[55] *Id.*, citing New Mexico Order ¶ 30.

[56] Arizona Order ¶ 78.

must be available for public inspection, the FCC would "continue to protect the confidential information of BOCs."[57] Qwest provides access to additional confidential information at its principal place of business as contemplated by FCC requirements.[58] AT&T's arguments remain contrary to law and contrary to fact.

5. Section 272(c): Qwest Will Not Discriminate In Favor of QCC and Has Safeguards in Place to Prevent Discrimination.

1. Section 272(c)(1) prohibits the BOC from discriminating between the 272 affiliate and any other entity in the provision or procurement of goods, services, facilities, and information, or in the establishment of standards.[59] As Qwest demonstrated in its opening brief, it has instituted substantial controls to assure that no such discrimination occurs.[60]

AT&T insists that Qwest "discriminates" in favor of QCC because it "undertakes a business case analysis" to determine whether to provide a new service requested by its 272 affiliate but not for new services requested by other carriers. Once again, these unsupported allegations do not address the rebuttal evidence that disproves the claim. As Ms. Schwartz explained, this business analysis is not a service that the BOC provides with or for QCC, but is rather an *internal* analysis that Qwest

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[57] Schwartz Rebuttal (Qwest Ex. 60) at 19, citing Report and Order, *Implementation of The Telecommunications Act of 1996: Accounting Safeguards Under The Telecommunications Act of 1996*, 11 FCC Rcd 17539 ¶ 122 (1996) ("Accounting Safeguards Order"). *See also* Washington Report ¶ 510 (finding good reason for maintenance of confidentiality).

[58] Schwartz Rebuttal (Qwest Ex. 60) at 19, citing Memorandum Opinion and Order, *Application by SBC Communications Inc., Southwestern Bell Telephone Company, And Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of The Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas*, 15 FCC Rcd 18354 ¶ 407 (2000) ("SBC Texas Order").

[59] 47 U.S.C. § 272(c)(1).

[60] *See* Qwest Brief at 42-43 (describing procedures QCC will have to follow to order services, guaranteeing that such services will be provided on a non-discriminatory basis); *see also id.* at 36-38 (describing measures designed to prevent provision of confidential Qwest information to QCC employees on a discriminatory basis).

conducts for its own benefit without any QCC participation.[61] Qwest undertakes such an analysis for new services requested by its 272 affiliate because these services are subjected to stringent requirements — namely, those imposed by section 272 — which do not apply to other transactions.[62]

AT&T's other claims of discrimination involve factual allegations that were never introduced into evidence and cannot be credited for this reason alone.[63] But they are wrong in any event. Ms. Schwartz offered unrebutted testimony that, following the transition to QCC as the 272 affiliate, the BOC bills it promptly and charges it interest for late payments, just as the BOC does for all other carriers.[64] AT&T also claims the BOC might shift services among affiliates to circumvent section 272(c), again relying on claims made in proceedings in other states never admitted into evidence here.[65] The FCC has refused to place weight on accusations of this kind by AT&T in earlier 271 proceedings,[66] and AT&T's allegations have likewise held no weight for other state commissions that

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[61] Indeed, as Ms. Schwartz explained in her testimony, the analysis is undertaken by a Compliance Oversight Team which QCC is not a member of and on which QCC has no representation. Schwartz Rebuttal (Qwest Ex. 60) at 21-22.

[62] *Id.* at 21.

[63] *See* AT&T's Pre-filed Comments at 14-15. These generalized allegations rely entirely on the Minnesota testimony of an AT&T witness (Cory Skluzak), are not part of this record, and have never been subject to cross-examination here.

[64] *See* Schwartz Rebuttal (Qwest Ex. 60) at 22.

[65] AT&T's Pre-filed Comments at 19-20. In fact, these claims have no merit. Mr. Skluzak's claims about transactions between the section 272 affiliate and other non-BOC affiliates have nothing to do with section 272(c)(1)'s purpose of preventing the BOC from discriminating in favor of its section 272 affiliate. *See* Schwartz Rebuttal (Qwest Ex. 60) at 21-22. Also, while AT&T claims that the BOC violates section 272(c) when it "leases dark fiber and transport services from QCC," the BOC is not, in so doing, providing a service to QCC on favored terms. AT&T's Pre-filed Comments at 20. Indeed, it is *not* providing a service to QCC at all. As Ms. Brunsting explained at the hearing, section 272(c) prevents Qwest from favoring QCC in services provided *to* QCC and does not apply to the services offered *by* QCC to the BOC or to others. *See* Tr. 4/24/02 (Brunsting) at 187.

[66] *See Bell South-Louisiana Order* ¶ 338 (rejecting an AT&T demand that a section 271 applicant be required "to disclose publicly all transactions between the Section 272 affiliate and other nonregulated affiliates" and noting that such transactions will be examined in the biennial audits) (emphasis added).

have addressed this issue, all of which have found that Qwest complies with the non-discrimination requirement of section 272(c)(1).[67]

2. AT&T's claims about the accounting requirements of section 272(c)(2) depend entirely on the same allegations it makes with respect to section 272(b)(2).[68] allegations which, as noted above, were thoroughly addressed in Ms. Schwartz's testimony and have been rejected by every other state commission to which AT&T has presented them.

6. Section 272(d) — Biennial Audit.

Section 272(d) requires that, once the BOC receives section 271 authority, it must obtain and pay for a joint Federal/State audit every two years.[69] AT&T claims that Qwest is "ask[ing] the Commission to put substantial faith in this audit process as a means of ensuring that Qwest complies with § 272."[70] As Qwest's opening brief demonstrates, Qwest has demonstrated that it will comply with section 272 not only by committing that it will submit to the audit mandated by section 272(d), but also by implementing numerous other controls and extensive employee training on *all* the requirements of section 272.[71] Section 272(d) is, of course, one important part of section 272, and

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[67] *See, e.g.*, Nebraska Order ¶¶ 17-18; New Mexico Order ¶¶ 39-41; Montana Order at 36-37. *See also* General Terms, Section 272, and Track A Report (Qwest Ex. 26) at 12.

[68] *See* AT&T's Pre-filed Comments at 21, basing its argument for non-compliance with section 272(c)(2) on the same claims it makes with respect to 272(b)(2).

[69] 47 U.S.C. § 272(d).

[70] *Id.*

[71] *See* Qwest Brief at 23-25 (summarizing the evidence presented by Ms. Schwartz and Ms. Brunsting concerning controls and training that Qwest has instituted) and *id.* at 21-47 (describing in more detail the measures Qwest has implemented to assure compliance with *every* requirement of section 272).

the FCC has repeatedly relied on the existence of 272(d) audit in consideration of previous section 271 applications.[72]

7. Qwest Complies with Section 272(e).

Section 272(e)(1) requires the BOC to fulfill any requests for telephone exchange service and exchange access as promptly for unaffiliated entities as it does for itself or its affiliates.[73] AT&T claims that Qwest has "produced *no* evidence, much less sufficient evidence, to carry its burden with respect to compliance with section 272(e)(1)."[74]

Once again, this claim in prefiled, unverified comments prior to the hearing ignores subsequent rebuttal and hearing testimony to the contrary. Qwest described in its opening brief,[75] and Ms. Schwartz described in both her initial and rebuttal affidavits,[76] the procedures and employee training that Qwest has implemented to assure that its provision of access services will be non-discriminatory. Qwest has also committed that after receiving 271 approval, it will report on a monthly basis its performance under section 272(e)(1) pursuant to FCC requirements.[77] Such measures have been repeatedly accepted by the FCC as sufficient evidence of compliance with

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[72] Memorandum Opinion and Order, *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, CC Docket No. 99-295, 15 FCC Rcd 3953 ¶ 412(1999), *aff'd sub nom. AT&T Corp. v. FCC*, 220 F.3d 607 (D.C. Cir. 2000) ("Bell Atlantic-New York Order"); *SBC-Texas Order* ¶ 406; Memorandum Opinion and Order, *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, CC Docket No. 00-217, FCC 01-29, 15 FCC Rcd 6237 (2001) ¶ 260 (SBC Kansas/Oklahoma Order), *modified Sprint Communications Co. v. FCC*, 274 F.3d 549 (D.C. Cir. 2001).

[73] 47 U.S.C. 272(e)(1).

[74] AT&T's Pre-filed Comments at 24 (emphasis added).

[75] *See* Qwest Brief at 34-37.

[76] Schwartz Direct (Qwest Ex. 59) at 31-34; Tr. 4/24/02 (Schwartz) at 144-45.

section 272(e)(1).[78] And every other commission to address the matter has found that Qwest has demonstrated that it complies with this requirement.[79]

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For the reasons stated above and in Qwest's opening brief, the Commission should conclude that Qwest has demonstrated that it will comply with the requirements of section 272 upon receipt of FCC approval under section 271.

C. THE SOUTH DAKOTA CLEC ARGUMENTS ABOUT TRACK A IGNORE BOTH FEDERAL LAW AND THE NATURE OF QWEST'S SGAT.

As Qwest explained in its opening brief,[80] the Track A requirement of section 271 requires a BOC to demonstrate four things: (1) that it has one or more binding agreements with CLECs that have been approved under section 252 of the Act; (2) that it provides access and interconnection to unaffiliated competing providers of telephone exchange service; (3) that these competitors collectively provide telephone exchange service to residential and business subscribers; and (4) that these competing providers offer telephone exchange service either exclusively or predominantly over their own facilities (which include the UNEs they lease from Qwest) in combination with resale.[81]

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[77] *See* Tr. 4/24/02 (Schwartz) at 145. *See also* Qwest Brief at 44-45.

[78] *Id.*

[79] *See* Nebraska Order ¶¶ 20, 32; New Mexico Order ¶¶ 47-48; Montana Order at 36-37. *See also* General Terms, Section 272, and Track A Report (Qwest Ex. 26) at 12, 69-70 (finding that Qwest had implemented "adequate measures to assure" compliance with section 272(e)).

[80] *See* Qwest Brief at 47-48.

[81] *See* Memorandum Opinion and Order, *Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan*, CC Docket No. 97-137, 12 FCC Rcd 20543, ¶¶ 62-104 (1997) ("*Ameritech Michigan Order*").

Qwest has demonstrated in this proceeding that it easily meets these requirements: Qwest estimates that CLECs are serving approximately 20 percent of the local market in the state,[82] and one CLEC, FiberCom, has acknowledged that it alone is serving almost 40,000 residential and business access lines in South Dakota via facilities owned by FiberCom.[83] Indeed, FiberCom characterizes itself as the "dominant" provider in the Black Hills area of the state.[84] This unrebutted evidence plainly shows that Qwest has fully satisfied each of the FCC's Track A requirements, and none of the parties claims otherwise in its post-hearing brief. The Commission Staff "agree[s] with Qwest that it satisfies the requirements of Track A in South Dakota."[85]

The only party that raises any concerns at all regarding Qwest's Track A showing is FiberCom, who argues that Qwest's Track A showing is inadequate because Qwest has not provided enough evidence that it has interconnection agreements in place that satisfy the competitive checklist.[86] This claim is off-base; the Commission has already addressed this issue and the CLECs present no reason for addressing it further now.

FiberCom and Midco raised this same argument in their pre-hearing motions concerning Qwest's section 271 application. The CLECs complained that, because Qwest is pursuing its section

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[82] Qwest Corporation's Direct Affidavit of David L. Teitzel re: Public Interest, filed on October 23, 2001 ("Teitzel Direct") (Qwest Ex. 1) at 20-30.

[83] *See* Black Hills FiberCom, L.L.C.'s Responses to Qwest Corporation's Data Requests for Black Hills FiberCom, filed April 19, 2002, at 1-2 ("FiberCom Data Request Response") (Qwest Ex. 3).

[84] Tr. 4/30/02 (White) at 84:10-13.

[85] Staff's Brief at 40.

[86] *See* FiberCom Brief at 3-5. Midco also claims that "Qwest apparently now agrees with" Midco's position that Qwest is proceeding under Track A simply because Qwest characterized this proceeding as a "Track A proceeding" in its post-hearing brief. *See* Midco Br. at 2. But Qwest has *never* claimed that it is attempting to receive section 271 authority via Track B; indeed, in its response to Midco's and Fibercom's motions, Qwest stated that, "[b]ecause other carriers have requested interconnection in South Dakota, Qwest has attempted to demonstrate its compliance with the Track A provision." Qwest's Brief in Opposition to

(continued...)

271 application under Track A of the Act, Qwest could not show checklist compliance by way of its statement of generally available terms ("SGAT").[87] FiberCom moved to dismiss Qwest's application,[88] while Midco demanded that Qwest provide additional proof of Qwest's compliance with Track A.[89]

In response, Qwest filed a detailed brief explaining why the CLECs' claims were both irrelevant and incorrect as a matter of law.[90] Qwest first pointed out that, even if the CLECs' legal argument were correct, their concern is moot. One South Dakota CLEC, KMC Telcom, has already opted into the SGAT that Qwest submitted to show checklist compliance in this proceeding.[91] As soon as the Commission approves that agreement, the SGAT will be exactly the sort of state-approved individual interconnection agreement that the CLECs are demanding.[92] Second, Qwest demonstrated that the CLECs' claims were not supported by either the text of the 1996 or the FCC's section 271 orders, both of which permit a BOC to use an SGAT or its equivalent to prove checklist compliance in a Track A application.[93] Finally, Qwest noted that, because the Commission's role in

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FiberCom's Motion to Deny Petition and Midcontinent's Motion to Define Track A Analysis (Mar. 21, 2002) at 4 ("Qwest SGAT Brief").

[88] *See* Black Hills FiberCom, L.L.C.'s Motion for Order Denying Petition (Mar. 4, 2002) ("FiberCom Motion"); Brief in Support of Black Hills FiberCom, L.L.C.'s Motion for Order Denying Petition (Mar. 4, 2002); Motion for Definition of Track A Analysis (Mar. 7, 2002) ("Midco Motion"); Brief in Support of Motion for Definition of Track A Analysis (Mar. 7, 2002).

[89] *See* FiberCom Motion at 1.

[90] *See* Midco Motion at 1.

[91] *See generally* Qwest's SGAT Brief.

[92] *Id.* at 7.

[93] *Id.* at 8.

[94] *Id.* at 10-22.

this proceeding is to provide a recommendation to the FCC on Qwest's application, nothing prevents the Commission from reviewing a model interconnection agreement as part of that advisory role.[94]

The Commission ultimately elected to grant Midco's motion, and "found that Qwest may not rely solely on its SGAT to prove compliance with the 14 point checklist but should also use interconnection agreements and any other evidence to demonstrate to the Commission that it is in compliance with the checklist items."[95] Qwest demonstrated in its pre-filed rebuttal testimony that it complied with each of the checklist items through both the SGAT and the KMC agreement.[96] As noted above, the Commission Staff agrees that Qwest has met its Track A requirements.

FiberCom now uses its post-hearing briefs in an attempt to ambush Qwest once again with these allegations. But FiberCom does not fully explain why Qwest's evidence is incomplete, or why this Commission may adopt an interpretation of the Act inconsistent with the FCC's. As discussed above, the FCC has established only four Track A requirements, and Qwest has plainly satisfied all of them. Because the FCC is the agency charged with enforcing the 1996 Act,[97] its interpretations of the Act's provisions are entitled to deference.[98] The FCC has also made it clear that "the states may

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[94] *Id.* at 23-24.

[95] Order Granting Motions; Order Amending Procedural Schedule and Extending Hearing Dates (Apr. 4, 2002) at 2.

[96] *See, e.g.*, Rebuttal Affidavit of Karen A. Stewart, Checklist Items 2 and 5 (Apr. 2, 2002) (Qwest Ex. 69) at 508-11 ("Qwest agrees to provide new facilities to the extent it has a Provider of Last Resort and/or Eligible Telecommunications Carrier obligation in a state. Specifically, the Qwest South Dakota SGAT, filed October 31, 2001, and the KMC agreement contain the following provisions. . .").

[97] *See AT&T Corp. v. FCC*, 220 F.3d 607, 625 (D.C. Cir. 2000) ("Interpreting the Telecommunications Act is the FCC's job . . . a proposition recognized by both Congress and the [Department of Justice].").

[98] *See Chevron U.S.A., Inc. v. Natural Resources Defense Council*, 467 U.S. 837, 843 (1984) ("[I]f the statute is silent or ambiguous with respect to the specific issue, the question for the court is whether the agency's answer is based on a permissible construction of the statute").

[redacted] with respect to BOC provision of intrastate interLATA service, requirements [redacted] with sections 271 and 272 *and the Commission's rules under those provisions*."[99]

Moreover, FiberCom's primary concern, that "[n]o CLEC is providing services under an [redacted] agreement," is irrelevant as a matter of law. As Qwest pointed out in its SGAT brief,[100] the Track A and B requirements of section 271(c)(1) are distinct from the checklist requirements of section 271(c)(2), and so the "competing provider" requirement of Track A does not apply to the agreements used to establish checklist compliance. More importantly, FiberCom is ignoring the fundamental reason why the FCC is correct that a BOC does not need to show that the CLECs providing service in a state (and that are thus relevant for the purposes of Track A) also have interconnection agreements that satisfy all parts of the checklist: As long as a state has approved an SGAT, that document places the BOC under a "concrete and specific legal obligation"[101] to permit CLECs to opt into any or all of its terms under the "pick and choose" provision of section 252(i).[102] For this reason, the Act does not impose the additional requirement of requiring the BOC to demonstrate that its interconnection agreements with CLECs actually providing service in a state comply with the checklist; even if those agreements do not comply, the CLEC has the option of simply opting into the agreement that does if it wishes. For all these reasons, the concern expressed by FiberCom is groundless.

[redacted] First Report and Order and Further Notice of Proposed Rulemaking, *Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as Amended*, 11 FCC Rcd [redacted] ¶ 47 (1996) (emphasis added).

[redacted] *See* Qwest SGAT Brief at 10-14.

[redacted] *Ameritech Michigan Order* ¶ 110.

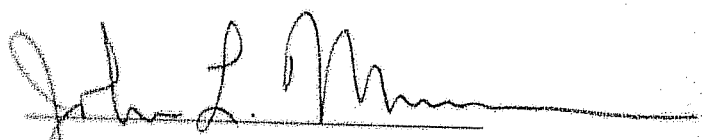
[redacted] *See* 47 U.S.C. § 252(i); *see also* Qwest SGAT Brief at 9-10.

III. CONCLUSION

For the reasons set forth herein and in Qwest's opening brief, Qwest is in full compliance with the requirements of the Act relating to general terms and conditions and Track A. Qwest has likewise demonstrated that, upon receiving section 271 approval, it will comply with all requirements of section 272.

Dated this 16th day of July, 2002.

Respectfully submitted,



John Munn
Qwest Corporation
1801 California Street, Suite 4900
Denver, Colorado 80202
(303) 672-5823

Attorney for Qwest Corporation

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
JUL 17 2002
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE ANALYSIS INTO QWEST CORPORATION'S COMPLIANCE WITH SECTION 271 (C) OF THE TELECOMMUNICATIONS ACT OF 1996	))))	DOCKET TC 01-165

QWEST CORPORATION'S POST-HEARING REPLY BRIEF ON THE PUBLIC INTEREST

July 16, 2002

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QWEST CORPORATION'S OPENING POST- HEARING REPLY BRIEF ON THE PUBLIC INTEREST

I. INTRODUCTION

Qwest Corporation ("Qwest") respectfully submits this post-hearing reply brief in support of its demonstration that its application to provide interLATA service in South Dakota "is consistent with the public interest, convenience, and necessity," as required by 47 U.S.C. § 271(d)(3)(C).

As Qwest stated in its opening brief, the public interest inquiry asks whether Qwest's application promotes competition in the local and long distance markets, whether there are adequate assurances that the local market will remain open after entry, and whether there are any "unusual circumstances" in the state that make BOC entry contrary to the public interest notwithstanding a showing of compliance with the competitive checklist. The Federal Communications Commission ("FCC") has repeatedly held that "compliance with the competitive checklist is, itself, a strong indicator that long distance entry is consistent with the public interest."[1] Indeed, the FCC has *never* rejected a section 271 application on public interest grounds where the BOC has satisfied the competitive checklist.

Qwest demonstrated in its opening brief that the record has identified no "unusual circumstances" in South Dakota that would overcome the checklist compliance's "strong assurance" that Qwest's markets are now open, or the performance assurance plan's "probative evidence" and other remedies designed to ensure that those markets will stay open after entry.[2] The other parties who provided testimony on the public interest issue in the hearings do not

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[1] Memorandum Opinion and Order, *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, 15 FCC Rcd 3953 ¶ 422 (1999) ("*Bell Atlantic New York Order*"), *aff'd sub nom. AT&T Corp. v. FCC*, 220 F.3d 607 (D.C. Cir. 2000).

[2] *Bell Atlantic New York Order* ¶¶ 423, 429.

seriously challenge Qwest's showing. Indeed, Staff appears to agree that, given checklist compliance and an acceptable QPAP, Qwest's "entry into the long-distance market will serve the public interest."[3] While Midco does make the bald assertion that "it believes that it made its point" on the UNE price squeeze issue at the hearing,[4] it does not address Qwest's detailed rebuttal of this evidence in its opening brief.

The only other party that raises any arguments regarding "unusual circumstances" is AT&T. While AT&T filed "verified comments" prior to the hearing, they were never verified, and AT&T did not sponsor a witness at the hearing to introduce them. Nor did it participate in cross-examination of Qwest's witness on the public interest issue. Its arguments should be disregarded for this reason alone. But in any event, as noted below, AT&T's "anything goes" approach does little more than illustrate, in the apt words of the Chairman of the Colorado Public Utilities Commission, "the heightened expectations that parties have in a public interest inquiry to sling as much as they can on the wall to see what will stick."[5]

II. NO PARTY DISAGREES WITH THE FCC'S STRONG PRESUMPTION THAT LONG DISTANCE ENTRY WILL BENEFIT CONSUMERS.

As Qwest noted in its opening brief, section 271 does not require it to provide evidence quantifying the benefits of long distance entry. The FCC *presumes* that the BOC's entrance as a new competitor in the long distance market will benefit consumers,[6] and has stated that "[a]s a

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[3] Staff's Brief (July 1, 2002) at 39 ("Staff Brief").

[4] Midcontinent's Post Hearing Brief (July 1, 2002) at 7 ("Midco Brief").

[5] Order on Staff Volume VII Regarding Section 272, the Public Interest, and Track A, *In the Matter of the Investigation into US WEST Communications, Inc.'s Compliance with § 271(c) of the Telecommunications Act of 1996*, Docket No. 97I-198T (March 15, 2002), at 44 ("Colorado Order").

[6] *See Bell Atlantic New York Order* ¶ 428; Memorandum Opinion and Order, *Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Texas*, 15 FCC Rcd 18354 ¶ 419 (2000) "SBC Texas Order"); Memorandum Opinion and Order, *Application by SBC Communications Inc., Southwestern Bell Telephone*

general matter, we believe that additional competition in telecommunications markets will enhance the public interest."[7] The other parties do not really dispute this point, which Qwest has corroborated through studies by Dr. Jerry Hausman, the Telecommunications Research Action Center ("TRAC"),[8] and the Consumer Federation of America.[9] Indeed, Staff acknowledges "that Qwest entry into the long-distance market has the potential to lead to savings for consumers,"[10] and that "if other companies could offer the bundle of local and long-distance services that a BOC granted Section 271 relief could, consumers could reasonably expect some or all of such benefits as lower prices, more choice, and better service to ensue in both markets."[11]

Staff mistakenly claims that Qwest uses the Hausman study to "attempt[] to convince the Commission to ignore" the checklist standards.[12] That is not Qwest's position. Through the Hausman study (and others), Qwest has simply attempted to quantify the benefits that will flow from BOC entry into the long-distance market assuming checklist compliance. It does not posit those benefits as a substitute for checklist compliance.

Staff also claims that Dr. Hausman's study failed to consider unspecified "other variables," apart from BOC entry, in the reduction of prices that it measured in New York and

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Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma, 16 FCC Rcd 6237 ¶ 268 (2001), *modified, Sprint Communications Co. v. FCC*, 274 F.3d 549 (D.C. Cir. 2001) ("SBC Kansas/Oklahoma Order"); *see also* 39th Supplemental Order; Commission Order Approving SGAT and QPAP, and Addressing Data Verification, Performance Data, OSS Testing, Change Management, and Public Interest, *U S WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, Docket Nos. UT-003022 & UT-003040, ¶ 268 (July 1, 2002) ("*Washington Final Order*") ("The FCC presumes that long-distance entry will benefit consumers if the local market is open to competition").

[7] *Bell Atlantic New York Order* ¶ 428.

[8] *See* Affidavit of David L. Teitzel, *In the Matter of the Investigation into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996*, Oct. 24, 2001, at 42 ("Teitzel Direct (Qwest Ex. 1)").

[9] *See* Qwest Brief at 10-13.

[10] Staff Brief at 39.

[11] *Id.* at 38.

[12] *Id.* at 39.

Texas. In fact, the Hausman study was expressly designed to control for such other factors as states' socio-economic characteristics, LATA definition, and other "state-specific, time invariant economic factors," as well as other factors (such as nationwide changes in competition among long-distance providers).[13] After controlling for those various factors, Dr. Hausman's study found a "statistically significant" correlation between Verizon's long distance entry in New York and the reduction in consumer prices that followed.[14] Under recognized statistical standards, if a study's t-statistic exceeds 2.0, the result is statistically significant;[15] Dr. Hausman's analyses of the data from New York and Texas involved a much higher t-statistic of 2.44 and 3.30.[16]

III. NO PARTY HAS DEMONSTRATED THAT THERE ARE ANY "UNUSUAL CIRCUMSTANCES" UNDERMINING THE PRESUMPTION IN FAVOR OF BOC INTERLATA ENTRY.

As Qwest explained in its opening brief,[17] the FCC and other state commissions in Qwest's region have made clear that the "unusual circumstances" inquiry is quite limited. Such circumstances do not include CLEC difficulties that involve no sins of omission or commission by the BOC.[18] Nor do they include mere assertions,[19] or matters within the scope of the fourteen-

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[13] *See* Jerry A. Hausman, Gregory K. Leonard, J. Gregory Sidak, *The Consumer-Welfare Benefits from Bell Company Entry into Long-Distance Telecommunications: Empirical Evidence from New York and Texas*, *available at* http://papers.ssrn.com/sol3/delivery.cfm/SSRN_ID289851_code011106140.pdf?abstractid=289851 (Jan. 9, 2002), at 5-6 ("Hausman Study")), *cited in* Rebuttal Affidavit of David L. Teitzel, Track A and Public Interest, *In the Matter of the Investigation into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996*, April 2, 2002, at 16 n. 20 ("Teitzel Rebuttal (Qwest Ex. 2)").

[14] *See id.* at 8-11, 13.

[15] *See, e.g.*, Jeffrey Woolridge, Econometric Analysis of Cross-section and Paneled Data 49-61 (MIT Press 2002).

[16] *See* Hausman Study at 6-8. The t-statistic is calculated by dividing the coefficient estimate by the standard error.

[17] *See* Qwest Brief at 15-17.

[18] *See* Qwest Brief at 16 & n.59 (citing *Bell Atlantic New York Order* ¶ 427).

[19] *Id.* at 15 & n.57;

point competitive checklist.[20] Nor will the FCC in the section 271 public interest inquiry "attempt to settle new and unresolved disputes about the precise content of an incumbent LEC's obligations to its competitors."[21]

Since Qwest filed its opening brief, the FCC has confirmed its holdings that the public interest inquiry is limited. In its most recent order, the FCC declared that it "disagree[d] with commenters who assert that [it] must, under [its] public interest standard, consider a variety of other factors as evidence that the local market is not yet truly open to competition, despite checklist compliance."[22] Rather, any concerns raised as "unusual circumstances" must "relate to the openness of the local telecommunications markets to competition."[23] Thus, the public interest inquiry cannot be used to impose an unrestricted wish list of regulatory obligations on Qwest, or to authorize a standardless query on whether entry is justified. For all these reasons, neither Midco's UNE-platform price squeeze argument nor AT&T's newly filed arguments implicate the FCC's public interest inquiry.

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[20] *See* Memorandum Opinion and Order, *Application by Verizon New England Inc., Bell Atlantic Communications, inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Maine*, CC Docket No. 02-61, FCC 02-187, ¶ 57 (rel. June 19, 2002) ("Verizon Maine Order") (affirming that the FCC "may neither limit nor extend the terms of the competitive checklist of section 271(c)(2)(B)" as part of the public interest analysis); Memorandum Opinion and Order, *Application by Verizon New England Inc., Bell Atlantic Communications Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization to Provide In-Region, InterLATA Services in Vermont*, 17 FCC Rcd 7625 ¶ 61 (2002) ("Verizon Vermont Order"); Memorandum Opinion and Order, *Application by Verizon New England Inc., Bell Atlantic Communications Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization to Provide In-Region, InterLATA Services in Rhode Island*, 17 FCC Rcd 3300 ¶ 102 (2002) ("Verizon Rhode Island Order") (same).

[21] *BellSouth Georgia/Louisiana Order* ¶ 208.

[22] Memorandum Opinion and Order, *Application by Verizon New Jersey Inc., Bell Atlantic Communications Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization to Provide In-Region, InterLATA Services in New Jersey*, WC Docket No. 02-67, FCC 02-189 ¶ 168 & n.516.

[23] *Id.* ¶ 190.

A. UNE-Platform "Price Squeeze"

As Qwest pointed out in its opening brief, the only "unusual circumstance" alleged in the record is the contention by Midco that there is a UNE-platform "price squeeze";[24] in other words, that Qwest's UNE-platform price is allegedly too high compared to the Commission-sanctioned TFR rate to permit CLECs to earn a positive margin in the residential market. Qwest demonstrated in its opening brief that an alleged "price squeeze" with regard to a single avenue of CLEC entry is not the type of "unusual circumstance" that could overcome the strong presumption that Qwest's entry into the long distance market is consistent with the public interest, and in any event no such "price squeeze" exists in South Dakota.[25] Midco's post-hearing brief makes no effort to address this showing; as noted above, Midco says only that "it believes that it made its point" at the hearing.[26]

In particular, Midco ignores each of the following showings by Qwest that completely undermine the alleged UNE-platform price squeeze argument:

- Any alleged UNE-P "price squeeze" is not preventing significant competition from occurring in the residential market. Two South Dakota CLECs alone, FiberCom and Midco, have acknowledged in these proceedings that they are serving almost 40,000 residential access lines via resale or their own facilities, and the total number for all CLECs is certainly higher.[27] Hence, the alleged "price squeeze" has not been shown to have an adverse affect upon the openness of the local telecommunications markets to competition, as required by the FCC.[28]

- Midco's suggestion that there is a UNE-platform "price squeeze" in the residential market ignores all of the revenues that a CLEC will receive beyond the basic TFR charge for basic local service, such as switched access charges, vertical features (such

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[24] AT&T also refers to an alleged UNE-platform price squeeze, but only in written testimony filed prior to the hearing and never sponsored by any witness. While, as noted below, that argument should not be credited, Mr. Teitzel discredited it in his rebuttal testimony. *See* Teitzel Rebuttal (Qwest Ex. 2) at 24-46.

[25] *See* Qwest Brief at 17-24.

[26] *See* Midco Brief at 7.

[27] *See* Qwest Brief at 20.

[28] *See Verizon New Jersey Order* ¶ 190.

as caller ID or call waiting), incremental tolls, and the subscriber line charge.[29] The FCC has now made clear that these additional revenues should be included in the comparison.[30]

- A CLEC using the UNE-platform to serve an average Qwest customer in Sioux Falls must pay $22.16.[31] Midco's witness conceded that this price includes everything a CLEC needs to provide a full complement of local services and vertical features.[32] If that CLEC targets the same customers as Qwest, it can earn $38.34 in revenue on average from each customer.[33] Subtracting the CLEC's cost for a UNE-platform from that potential average revenue yields a potential margin of $16.18, or 73%.[34] And if a CLEC targets customers that are more likely to purchase numerous vertical features, its average margins could well be higher.[35]

- The price comparison presented by Mr. Simmons, the alleged basis for the "price squeeze" argument, was woefully incomplete and misleading. Mr. Simmons claimed that Midco's costs for a UNE-platform are $26.50 but its revenues are only $23.95. First, as Mr. Simmons conceded on cross examination, the $23.95 revenue figure omitted the $5.48 subscriber line charge that Midco charges its customers; as Qwest's witness and Staff's witness agreed, that charge is revenue to a local exchange carrier and is not passed along to the government.[36] Second, and again conceded by Mr. Simmons, his comparison omitted all revenues that Midco receives from vertical features such as call waiting or caller ID.[37] These result in an average of $4.65 to $4.95 in additional revenue.[38] And third, Qwest pointed out that it is not clear at all from Mr. Simmons' chart whether he included all of the long distance toll revenues that Midco receives from its customers.[39]

In any event, Midco states that instead of using UNE-platform lines, "Midcontinent has chosen to provide local exchange services through its own hybrid fiber coax network, where

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29 *See id.*

30 *See Verizon Vermont Order* ¶ 71 ("incremental toll revenues," and "expected net access revenues and savings" are relevant to a residential price-squeeze analysis).

31 *See* Teitzel Rebuttal (Qwest Ex. 2) at 34:11.

32 *See* Qwest Brief at 21.

33 *See id.*

34 *See id.*

35 *See id.* at 21-22.

36 *See id.* at 22-23.

37 *See id.* at 23-24.

38 *See id.* at 24.

39 *See id.*

available, or via Qwest's resold services."[40] Midco's decision to enter the residential market through these two other avenues only demonstrates that competition is proceeding as Congress planned. As the FCC stated in its *Verizon Vermont Order*, "Congress envisioned competitors entering the market through different entry mechanisms," and it "ensure[d] that resale provides a profit margin where . . . the costs of individual elements exceeds the retail rate."[41] Moreover, "it is appropriate to consider the effect of resale on whether a price squeeze exists" because "the Act contemplates the existence of subsidized local rates in high-cost areas and addresses such potential price squeezes through the availability of resale."[42] Midco's significant entry into the residential market through resale and its own facilities demonstrates precisely why, even if there were a UNE-platform "price squeeze" (which there is not), it could not constitute an "unusual circumstance" that would justify denying Qwest's section 271 application.

B. Unfiled Agreements

AT&T argues that the Minnesota Department of Commerce's ("DOC") pending unfiled agreements complaint, filed in February 2002 is a reason to deny Qwest's section 271 application for South Dakota on public interest grounds.[43] However, as demonstrated below, AT&T has failed to demonstrate why this section 271 proceeding in South Dakota should be held hostage to the pending proceedings in Minnesota (and now before the FCC) on this matter.

1. This Section 271 Proceeding Is Not the Proper Forum For Addressing

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[40] *See id.* (quoting Simmons Direct, Exhibit 38, at 19-20).

[41] *Verizon Vermont Order* ¶ 69; *accord BellSouth Georgia/Louisiana Order* ¶ 287 (same).

[42] *Verizon Vermont Order* ¶ 69.

[43] *See* AT&T Brief at 3-16. In contrast, the Staff's position on this issue is that the Commission should open a separate docket to address it. Staff Brief at 41. Similarly, Midco does not argue that this dispute should affect the public interest inquiry under Section 271; it recommends "a disinterested third party review" of the agreements at issue. Midco Brief at 12. FiberCom makes no effort to explain how this dispute relates to the public interest inquiry as defined by the FCC.

the Unfiled Agreements Dispute.

AT&T's argument is premised entirely on the FCC's statement that it is "interested in evidence that a BOC applicant has engaged in discriminatory or other anticompetitive conduct, or failed to comply with state and federal telecommunications regulations."[44] But the FCC has made just as clear (indeed, in the very next sentence of the same decision) that it is not interested in such misconduct for its own sake; rather, such evidence is relevant only insofar as it "would tend to undermine our confidence that the BOC's local market is, or will remain, open to competition once the BOC has received interLATA authority."[45] Other commissions in Qwest's region have similarly found that the public interest test is prospective in nature.[46]

This dispute does not meet those criteria. As a threshold matter, virtually all of the agreements cited by AT&T are between Qwest and Eschelon, a CLEC that does not operate in South Dakota at all.[47] Indeed, even if the agreements between Eschelon and Qwest constituted interconnection agreements that should be filed under Section 252(a), they have no relationship to South Dakota and would not have been filed in South Dakota. Thus, no South Dakota CLEC would have had access to the Eschelon agreements' provisions under any circumstances. Such agreements cannot conceivably "relate to the openness of the local telecommunications markets"

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[44] Memorandum Opinion And Order, Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan, 12 FCC Rcd 20543 ¶ 397 (1997).

[45] *Id.*; *see also Verizon New Jersey Order* ¶ 190.

[46] *See* Workshop 4, Part 2, Findings and Recommendation Report of the Commission and Procedural Ruling, *In the Matter of the Investigation into the Entry of Qwest Corporation into In-Region InterLATA Services under Section 271 of the Telecommunications Act of 1996*, Oregon Public Utility Commission Docket No. UM 823 (Jun. 3, 2002) at 46; *Colorado Order* at 44.

[47] *See* Affidavit of Dan Hult at 1.

in South Dakota, and thus do not qualify as an "unusual circumstance" justifying a decision to "deny or delay [a section 271] application under the public interest standard."[48]

Moreover, whether Qwest was obligated to file the agreements cited by AT&T is solely a question of whether Qwest properly interpreted section 252, which (as noted below) the FCC is now in the process of resolving. As noted above, the FCC has made clear that "new and unresolved interpretive disputes about the precise content of an incumbent LEC's obligations to its competitors" are not appropriate for resolution in section 271 proceedings, which "simply could not function as Congress intended" if this were not the rule.[49]

Contrary to AT&T's claim that "[t]he standard for filing agreements under 47 U.S.C. 252 is clear,"[50] the relevant portion of section 252 provides only limited guidance on which types of intercarrier agreements must be filed, and the precise contours of the state filing obligation are a matter of good-faith legal dispute. Indeed, the participants to the unfiled agreements proceedings, including AT&T and the Minnesota Department of Commerce ("Minnesota DOC"), have themselves proposed conflicting standards for which types of agreements must be filed, and the standard formulated by AT&T for its purposes both here and in Minnesota is fundamentally flawed. AT&T proposes that "any agreement between carriers which addresses the same issues, or deals with the same subject matter as an interconnection agreement should be approved, filed, and made available in the same manner as any other interconnection agreement."[51] Yet as even the expert for the Minnesota DOC recognized, the AT&T

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48 *Verizon New Jersey Order* ¶ 190.

49 *Kansas-Oklahoma Order* ¶ 19.

50 AT&T Brief at 9.

51 *Id.* at 11.

interconnection agreement itself contains terms that do not, under any definition, fall within sections 251 and 252.[52]

In Qwest's view, carriers are not required to file agreements that do not contain what section 252(a)(1) describes as "a detailed schedule of itemized charges for interconnection and each service or network element included in the agreement." In other words, the statute's mandatory 90-day prior approval process should apply to — and delay implementation of — only the most significant aspects of a voluntary agreement: the rates and associated service descriptions for interconnection, services and network elements. Other ILEC-CLEC contractual arrangements that extend beyond this "schedule," such as account team support, mechanics of provisioning and billing for ordered interconnection services or UNEs, or dispute resolution, do not implicate the filing requirement. Any other rule would undermine the parties' incentives to negotiate and rapidly settle issues in dispute with other carriers, and impede the ability of ILECs and CLECs to develop pro-competitive and creative arrangements that serve to advance local competition, contrary to the intent of the 1996 Act.[53]

Because of the uncertainty surrounding the requirements of section 252 and the potential problems an overly broad interpretation of that section would create, Qwest has appropriately petitioned the authoritative interpreter of section 252, the FCC, for guidance.[54] The FCC has taken comment on Qwest's petition for a declaratory ruling and will finally resolve the matter

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[52] Tr. from Docket No. P-421/C-02-197, Vol. I, Testimony of W. Clay Deanhardt, at 137:4-13:

Q: Okay. I mean would a business person conclude that [Section 15.1] is a term of interconnection?

A: A business person might actually, yes.

Q: A business person might. Someone else might disagree?

A: In this particular case, yes. A regulatory person might disagree with the business person.

[53] Telecommunications Act of 1996, Joint Managers Statement, S. Conf. Rep. No. 104-230 at 1 (1996).

[54] *See* Petition for Declaratory Ruling of Qwest Communications International Inc., *Qwest Communications International, Inc., Petition for Declaratory Ruling on the Scope of the Duty To File and Obtain Prior Approval of*

one way or the other. As other commissions have agreed, there is little point to duplicating these efforts in this proceeding.[55] Indeed, as noted above, the FCC has repeatedly made clear that a section 271 docket is not the proper place to resolve this kind of dispute concerning the precise scope of a BOC's section 251 and 252 obligations.[56] On review of the first section 271 order, the D.C. Circuit (which has exclusive review of such orders[57]) has agreed that AT&T's contrary efforts to use 271 proceedings as a general review of local competition regulations is inappropriate.[58]

The FCC reiterated this policy in a strikingly similar context in the *BellSouth Georgia/Louisiana Order*. In that proceeding, two CLECs claimed that a BellSouth interconnection policy violated the CLECs' "rights to interconnect 'at any technically feasible point' within BellSouth's network," and that, as a result, the BOC had not satisfied its obligations under checklist items 1 and 9.[59] The FCC rejected the CLECs' argument because (a)

Negotiated Contractual Arrangements Under Section 252(a)(1), WC Docket 02-89 (Apr. 23, 2002).

[55] The Public Service Commission of Wyoming explained why this dispute belongs in front of the FCC (and not in the state section 271 docket) as follows:

> The issue of what constitutes an interconnection agreement which must be filed for approval is properly before the Federal Communications Commission. It makes no sense for us to craft a local standard which might require the filing of an agreement in Wyoming while the same document could be kept secret in an adjoining state. There are many instances in which local expertise and concerns require us to undertake Wyoming solutions to Wyoming problems; but this is not such a case.

Order on AT&T Motion to Reopen Proceedings, *In the Matter of the Application of Qwest Corporation Regarding Relief Under Section 271 of the Federal Telecommunications Act of 1996, Wyoming's Participation in a Multi-State Section 271 Process, and Approval of its Statement of Generally Available Terms*, WY Pub. Serv. Comm'n, Docket No. 70000-TA-00-599 at 3 (June 18, 2002). *See also* Evaluation of the Colorado Public Utilities Commission, *Application by Qwest Communications International, Inc., for Provision of In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska and North Dakota*, WC Docket No. 02-148 (July 2, 2002) at 65 ("Colorado Evaluation"); *Washington Final Order* ¶ 293.

[56] *SBC Kansas/Oklahoma Order* ¶ 19. *See also SBC Texas Order* ¶¶ 23-27.

[57] 47 U.S.C. § 402(b)(9).

[58] *AT&T Corp. v. FCC*, 220 F.3d 607, 631 (D.C. Cir. 2000).

[59] *BellSouth Georgia/Louisiana Order* ¶ 207.

the BellSouth policy at issue had been rescinded,[60] (b) a section 271 docket was not the place "to settle new and unresolved disputes about the precise content of an incumbent LEC's obligations to its competitors,"[61] and (c) the issue concerned matters "open . . . before [the] Commission" in another docket.[62]

All of these considerations apply here. Whatever issues Qwest's past practices may present (and Qwest does not believe there are any), they relate to its existing agreements and are being dealt with in other pending proceedings. Qwest has committed to applying a very broad standard with respect to future agreements with CLECs, in order to remove any doubt as to whether Qwest will be complying with any reasonable standard that a state or the FCC might possibly apply. While Qwest's FCC petition is pending, Qwest has voluntarily committed to file with the Commission all future contracts, agreements, and letters of understanding with CLECs that create obligations to meet the requirements of sections 251(b) or (c).[63] Qwest is also forming a committee of senior managers (at the Executive Director level and above) from its Legal Affairs, Public Policy, Wholesale Business Development, Wholesale Service Delivery, and Network divisions to review all such future agreements involving Qwest's in-region wholesale activities and ensure that Qwest complies with this commitment and any ruling the FCC issues on Qwest's petition.[64]

Almost every other state commission that has considered and ruled on similar motions to delay or condition section 271 proceedings on this score has agreed that this matter should be

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[60] *Id.* ¶ 208.

[61] *Id.* (citing *SBC Kansas/Oklahoma Order* ¶ 19).

[62] *Id.*

[63] *See* Letter from Mr. R. Steven Davis, Sr. Vice President, Policy and Law, Qwest Corporation, to Jim Burg, Chairperson, Pam Nelson, Vice Chairperson, Robert Sahr, Commissioner (May 21, 2002), attached to Affidavit of Todd Lundy (June 12, 2002) as Exhibit 1.

[64] *Id.*

resolved outside the section 271 process. The Washington Commission recently rejected requests to delay the public interest proceeding in that state because of this issue, noting that "no party has filed a complaint with this Commission as in Minnesota and other states. If the parties have concerns about a specific agreement, the parties should bring a complaint, as in Minnesota."[65] AT&T also filed motions in nine states asking those commissions to reopen their section 271 public interest proceedings to consider the unfiled agreements dispute and deny Qwest's application on that basis.[66] Six of these states — Colorado, Iowa, Montana, Nebraska, North Dakota, and Wyoming — have formally ruled on the motion and rejected it.[67] Even the Iowa Utilities Board, which did investigate these agreements in a separate docket and concluded that they should have been filed,[68] still rejected AT&T's call to re-open Qwest's section 271

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[65] *Washington Final Order* ¶ 292.

[66] *See, e.g.*, AT&T's Motion to Reopen Proceedings, *In the Matter of the Application of Qwest Corporation Regarding Relief Under Section 271 of the Federal Telecommunications Act of 1996, Wyoming's Participation in a Multi-State Section 271 Process and Approval of its Statement of Generally Available Terms*, WY Pub. Serv. Comm'n, Docket No. 70000-TA-00-599 (Record No. 5924) (May 13, 2002).

[67] *See* Order Denying Motion, *In the Matter of the Colorado Public Utilities Commission's Recommendation to the Federal Communications Commission Regarding Qwest Corporation's Provision of In-Region, InterLATA Services in Colorado*, CO Pub. Utils. Comm'n, Docket No. 02M-260T (June 11, 2002); Order to Consider Unfiled Agreements, *In re U S WEST Communications, Inc., n/k/a Qwest Corporation*, IA Dept. of Commerce, Docket Nos. INU-00-2, SPU-00-11 (June 7, 2002) ("Iowa Order to Consider Unfiled Agreements"); Notice of Commission Action, *In the Matter of the Investigation into Qwest Corporation's Compliance with Section 271 of the Telecommunications Act of 1996*, Montana Public Service Comm'n, Docket No. D2000.5.70 (June 3, 2002); Motion to Reopen 271 Proceedings Denied, *In the Matter of Qwest Corporation, Denver, Colorado, filing its notice of intention to file Section 271(c) application with the FCC and request for Commission to verify Qwest Corporation's compliance with Section 271(c)*, NE Pub. Serv. Comm'n, Application No. C-1830 (June 12, 2002); Transcript of Special Meeting, *U S WEST Communications, Inc. Section 271 Compliance Investigation*, North Dakota Public Service Comm'n, Case No. PU-314-97-193 (June 13, 2002); Order on AT&T Motion to Reopen Proceedings, *In the Matter of the Application of Qwest Corporation Regarding Relief Under Section 271 of the Federal Telecommunications Act of 1996, Wyoming's Participation in a Multi-State Section 271 Process, and Approval of its Statement of Generally Available Terms*, WY Pub. Serv. Comm'n, Docket No. 70000-TA-00-599, Record No. 5924 (June 18, 2002).

While two of the Commissioners of the Arizona Corporation Commission have recently sought clarification on the impact of any such agreements on the section 271 review process, *see* Letter from Marc Spitzer, Commissioner, to all parties, Arizona Corporation Comm'n, Docket No T-00000A-97-0238 (June 26, 2002); Letter from Jim Irvin, Commissioner, to all parties, Arizona Corporation Comm'n, Docket No T-00000A-97-0238 (June 27, 2002), as discussed below, a number of Commissions have concluded that there is no evidence that the absence of particular CLEC's has prevented exhaustive considerations of all relevant issues.

[68] *See* Order Making Tentative Findings, Giving Notice For Purpose of Civil Penalties, and Granting

application. The Board held that because its order in the unfiled agreements docket (Docket No. FCU-02-2) put Qwest on notice that future failures to file would result in penalties, the matter was resolved going forward, which is all that section 271 requires.[69]

2. In Any Event, Qwest Is Vigorously Disputing in the Minnesota Proceedings AT&T's Claims that Qwest Has Discriminated Against CLECs, Even Outside South Dakota.

Of course, if Qwest is found in these other pending proceedings not to have any obligation to file the agreements at issue, it has no legal obligation to make their terms available to other carriers under section 252(i), and any failure to offer these terms to other carriers is not unlawfully discriminatory. Conversely, since as noted above Qwest has committed to file the relevant future agreements while the FCC considers this question, the terms of those future agreements *will* be available to other CLECs and hence there is no more putative discrimination problem left to solve going forward. And in any event, Qwest's performance in providing nondiscriminatory access to network elements and interconnection is being tested *directly* on the basis of actual data in the parallel checklist proceedings. But AT&T's specific complaints about supposedly discriminatory terms are the subject of vigorous opposition by Qwest in the Minnesota proceedings, and that pending dispute provides further reason not to import these allegations into this public interest inquiry in South Dakota.

As noted above, most of AT&T's allegations relate to various Qwest agreements with Eschelon, which does not provide service in South Dakota — and thus whose agreements are not even conceivably relevant to any Section 252 obligations here. But even these allegations are seriously at odds with the Minnesota record.

Opportunity to Request Hearing, *In re AT&T Corporation v. Qwest Corporation*, Iowa Utilities Board, Docket No. FCU-02-2 (May 29, 2002).

[69] *See* Iowa Order to Consider Unfiled Agreements at 9-10.

For example, Qwest's agreement to provide an on-site provisioning team to Eschelon was approved by the Minnesota Commission as an amendment to its interconnection agreement in January 2001, and thus fully available to AT&T or any other CLEC.[70] Qwest's additional agreement to provide Eschelon a credit, which AT&T misunderstands,[71] was an interim settlement of a dispute about the ability of Qwest's UNE Star service (not used by AT&T) to track revenues owed to Eschelon by IXCs for *non-local*, switched access traffic — and thus is far afield from the subject matter of Section 252. The same is equally true of the amount of payments by *Qwest* to *Eschelon* for the latter's termination of Qwest's *intraLATA toll* traffic. As the FCC has made very clear, access charges are subject to the federal and state regulatory regimes that predate the enactment of the 1996 Act, and not to the provisions of Sections 251 and 252.[72] Qwest has also presented unrebutted evidence in the pending Minnesota hearings that Eschelon was uniquely suited to and did provide valuable consulting services to Qwest, which in any event Qwest believed were outside the scope of Section 252 as purchases from rather than services to a CLEC as a vendor.

Similarly, AT&T's claim about "more favorable service interval terms" for Covad[73] is wrong. Here again, at the hearing in Minnesota, Qwest presented unrebutted testimony that the service goals articulated in the April 19, 2000 Service Level Agreement with Covad were

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[70] *See* Eighth Amendment to Interconnection Agreement between Eschelon Telecom of Minnesota, Inc. and Qwest Corporation (Dec. 6, 2000), at § 2.10; Tr. from Minn. PUC Docket No. P-421/C-02-197, Vol. II, Testimony of Michael Hydock, at 161:2-163:22.

[71] This was not a $13 per-line per-month credit. It was a credit for the difference between that amount and any switched access revenues successfully collected by Eschelon from IXCs. As noted below, this was designed to compensate Eschelon for the absence of a tracking mechanism for that traffic in Qwest's service in reporting it. *See* July 3, 2001 Confidential Letter Regarding Status of Switched Access Minute Reporting, Exhibit WCD-5 in Minn. PUC Docket No. P-421/C-02-197, ¶ 2.

[72] First Report and Order, *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, 11 FCC Rcd 15499 ¶¶ 176, 1033-35 (1996), *aff'd in pertinent part sub nom. Competitive Telecommunications Ass'n v. FCC*, 117 F.3d 1068 (8th Cir. 1997) (subsequent history omitted).

[73] *See* AT&T Brief at 4.

implemented for *all* CLEC customers — not just Covad.[74] Indeed, from an ordering and processing perspective, it would be impossible to have different service standards for any CLEC.[75] In any event, these disputes are matters being addressed outside the scope of this proceeding and, as the FCC has cautioned, are not within the scope of this prospective public interest inquiry.

3. AT&T's Claim About the Absence of Other CLECs from This Proceeding Should Be Rejected.

Finally, AT&T claims that by settling CLECs' disputes, Qwest has somehow manipulated the regulatory process, and that this is also a public interest concern.[76] This claim does not go to whether the South Dakota local market is currently open or would remain so after grant of Qwest's application *at all*. Moreover, the suggestion that Qwest's agreements with these CLECs constitute some sort of "gag order" is unfair. The agreements included a process to resolve provisioning issues, clearly a process which promotes, not impairs, section 271 interests.

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[74] Tr. from Docket No. P-421/C-02-197, Vol. III, Testimony of Kenneth Beck, at 168:23-169:8:

Q: Are your processes the same for all CLECs?

A: Our processes are the same for all CLECs. It's a large operation. It's the only way we can operate. If the bar changes, we have to — we make those moves for all CLECs. So our processes do support all CLECs all the time.

Q: Did you take — I actually have one more. Did you take any special efforts to single out Covad and give it special processes?

A: We took no efforts to single out Covad and give them special processes.

[75] Tr. from Docket No. P-421/C-02-197, Vol. III, Testimony of Kenneth Beck, at 146:17-147:1:

A: . . . We have a very large operation. We handle a number of orders. And the only way we can do it right is to process those orders in the same way for all customers and to determine the bar that needs to be set at the time and to move towards that bar for all customers that are out there. That has been our process all along for these past five years and continues to be our process today as we move into the more formalized measuring and PID environment that we're in today.

[76] *See* AT&T Brief at 7-9.

As noted above, Eschelon does not even provide service in South Dakota.[77] And the agreement with Z-Tel cited by AT&T should hardly be controversial. It simply contains a "litigation stand-down" provision that provides that the parties "shall engage in good faith negotiations" for a 60-day period to arrive at mutually beneficial interconnection agreement amendments or business-to-business agreements, during which Z-Tel would not "file any documents . . . or advocate in any forum . . . anything which is disparaging or critical of Qwest while the Parties attempt to reach resolution on outstanding issues."[78] Such provisions are common elements in memoranda of understanding and allow the parties to negotiate in an atmosphere clear of the adversarial posture of litigation proceedings. Contrary to AT&T's accusations, this agreement does not demand that Z-Tel forego any rights or remedies after the 60-day period — or force it to enter into the 60-day negotiation process.

CLECs certainly have no obligation to participate in the section 271 process or any other regulatory proceeding, and whether or not the CLEC chooses to join the process as an active participant or pursue its concerns some other way outside the regulatory process is a matter for the CLEC's own business judgment. For this reason, even the Iowa Utilities Board (which *did* find against Qwest on the section 252 question) rejected AT&T's motion to reopen that state's section 271 proceedings; in its words, there was simply "no way of knowing, even without the agreement, that other CLECs would have had the inclination to participate" in the section 271 process, and hence no reason to think the process was distorted or incomplete.[79] The Colorado Commission recently came to the same conclusion in its comments to the FCC on this issue: "In

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77 In any event, the relevant Eschelon agreement was terminated in February 2002, well before the hearing in this case. *See* Joint Statement of Undisputed Facts (Ex. 300), Minnesota Pub. Utils. Comm'n Docket No. P-421/C-02-197, ¶¶ 36, 50, 61, 70.

78 *Memorandum of Understanding* between Qwest Corporation and Z-Tel Communications, Inc. (May 18, 2001).

79 Iowa Order to Consider Unfiled Agreements at 10.

a 'but for' world, the potential impact of CLEC *non*participation in the collaborative [271] process is, at worst, close to nil."[80]

AT&T's attempts to paint these agreements as sinister manipulation are inaccurate. They are no different from AT&T's own settlement agreement in connection with the U S WEST/Qwest merger, which the Minnesota Commission roundly endorsed.[81] The purpose of these settlements was to *resolve* complaints, not suppress them. It is hardly unusual (a) for carriers to get into commercial and regulatory disputes with each other, (b) for those disputes to make their way into formal regulatory and court proceedings, and (c) for the carriers to resolve their disputes outside the formal proceedings in a way that makes participation in those proceedings unnecessary. Here, too, Qwest and various CLECs chose to settle their disputes outside of the regulatory process. Once the CLECs' concerns had been addressed, it follows that the CLECs would forbear from participating in the proceeding.

Settlements such as these are both legal and desirable. Indeed, there is a strong public policy in favor of encouraging the private settlement of disputes instead of litigating them in formal proceedings. The South Dakota courts have held repeatedly that it is in the public interest to promote settlements between litigants.[82] And any suggestion that Qwest's section 271 application for South Dakota is not being fully and aggressively litigated, or that there are no committed advocates opposing Qwest's application,[83] is simply not credible. AT&T, FiberCom, and Midco have participated actively in this proceeding, and AT&T in particular has not been

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[80] *See* Colorado Evaluation at 64.

[81] Hearing Transcript, *In the Matter of the Merger of the Parent Corporation of Qwest Communications Corporation, LCI International Telecom Corp., USLD Communications, Inc., Phoenix Network, Inc. and U S WEST Communications, Inc.*, Minnesota Public Utilities Comm'n Docket No. P-3009 (Feb. 29, 2000) at 93:17-20.

[82] *See, e.g., Driscoll v. Driscoll*, 568 N.W.2d 771, 774 (S.D. 1997) ("[I]t is good public policy to encourage settlement agreements").

[83] *See* AT&T Brief at 7-8.

shy about raising non-participant carriers' issues.[84] No party could fairly suggest that the record in this matter is incomplete in any way, or that the issues have been inadequately litigated.

C. AT&T's Other Complaints

As Qwest pointed out in its opening brief,[85] AT&T never provided any testimony on any public interest issues and never participated in that phase of the hearing.[86] In a post-hearing brief, however, AT&T raises three other matters as "unusual circumstances": (1) a UNE-P testing dispute in another state (Minnesota); (2) complaints by Touch America already pending at the FCC that involve long distance, not local competition, issues; and (3) a suggestion about Qwest's "attitude." None of these claims meets the FCC's standards for "unusual circumstances" that could overcome the presumption that, once Qwest has met the competitive checklist, its application is in the public interest.[87]

1. The Minnesota Systems Testing Dispute

The point of the public interest inquiry is to determine whether markets "are open to competition" now, and whether there is sufficient "assurance that markets will remain open after grant of the application."[88] It is not an opportunity to exact a second punishment for one-shot incidents that have already been resolved.[89] AT&T, however, abuses this inquiry by attempting

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[84] *See, e.g.*, AT&T Brief at 17-18 (discussing Touch America's FCC complaints).

[85] *See* Qwest Brief at 2 n.3.

[86] AT&T filed "Verified Comments" prior the hearing, but those comments were never in fact verified. AT&T never had a witness sponsor the comments at the hearing, and thus Qwest had no opportunity to cross-examine AT&T on any of them. For this reason, AT&T's effort at this late date to "incorporate[] by reference" those unverified allegations, *see* AT&T Brief at 1, should be rejected. Even so, all of these allegations are rebutted in Mr. Teitzel's Rebuttal Affidavit. *See generally* Teitzel Rebuttal (Qwest Ex. 2).

[87] *SBC Kansas/Oklahoma Order* ¶ 268.

[88] *Id.* ¶ 267.

[89] *See* Colorado Order at 45-46 ("[T]o put Qwest in the penalty box now for its otherwise-penalized behavior, would be both arbitrary and duplicative. The 'public interest' standard of § 271 should not be used by this

to turn a resolved Minnesota systems testing dispute between AT&T and Qwest into a public interest issue in South Dakota.[90]

Qwest agreed to the testing requested by AT&T in Minnesota as soon as the Minnesota Commission had made its view clear, and the testing has now been completed. Importantly, the test did not find anything that was not also found in the ROC OSS test and the Arizona OSS test, or that necessitated any changes in Qwest's OSS at all; indeed, every other state to rule on AT&T's testing request found it to be unnecessary and duplicative of the OSS tests already underway.[91] Moreover, the fact that Qwest had provisioned 79,111 UNE-P loops in Minnesota as of October 31, 2001 confirms that its OSS systems in Minnesota are working properly.[92] And while the Minnesota Commission affirmed the ALJ's finding of liability, it reduced the overall level of the fines that the ALJ recommended. Even then, a majority of Commissioners expressed

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Commission or others in so cavalier a way.").

[90] *See* AT&T Brief at 16-17.

[91] *See, e.g.*, Commission Decision Regarding Qwest Corporation's Compliance with 47 U.S.C. § 271 Checklist, *In the Matter of U S WEST Communications, Inc.'s Motion for an Alternative Procedure to Manage its Section 271 Application*, Idaho Public Utilities Comm'n, Case No. USW-T-00-3 (Nov. 21, 2001), at 8-9 (Idaho); Conditional Statement Regarding August 20, 2001, Report, *In re U S WEST Communications, Inc., n/k/a Qwest Corporation*, Docket Nos. INU-00-2, SPU-00-11 (Dec. 21, 2001) at 18 (Iowa) (finding the new SGAT language sufficient for compliance with checklist item 2); Final Report on Checklist Item 2 — Access to Unbundled Network Elements and Checklist Item 4 — Access to Unbundled Loops, *In the Matter of the Investigation into Qwest Corporation's Compliance with Section 271 of the Telecommunications Act of 1996*, Docket No. D2000.5.70 (Jan. 30, 2002), at 32 (Montana); Interim Consultative Report on Group 4 Checklist Items, *U S WEST Communications, Inc. Section 271 Compliance Investigation*, Case No. PU-314-97-193 (Jan. 16, 2002), at 8-9 (acknowledging the new SGAT language and conditional compliance with checklist item 2) (North Dakota)). Colorado, Nebraska, Oregon, and Washington have ruled similarly. *See, e.g.*, Workshop 3 Findings and Recommendation Report of the Commission, *In the Matter of the Investigation into the Entry of Qwest Corporation, formerly known as U S WEST Communications, Inc., into In-Region InterLATA Services under Section 271 of the Telecommunications Act of 1996*, Docket No. UM 823 (Dec. 21, 2001), at 4 (stating that "until [AT&T] gets the type of testing it wants, *without limitation*, AT&T appears to continue to be dissatisfied") (Oregon); Thirteenth Supplemental Order Initial Order (Workshop Three): Checklist Item No. 2, 5, and 6, *In the Matter of the Investigation into U S WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996, In the Matter of U S WEST Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996*, Docket Nos. UT-003022, UT-003040 (July 2001), at 9 (Washington).

[92] *See* Qwest Corporation's Rebuttal Affidavit of David L. Teitzel re: Track A and Public Interest, *In the Matter of a Commission Investigation Into Qwest's Compliance with Section 271(d)(3)(C) of the Telecommunications Act of 1996 that the Requested Authorization is Consistent with the Public Interest, Convenience and Necessity*, Minnesota Public Utilities Comm'n Docket No. P-421/CI-01-1373 (May 15, 2002) at 105:2-4.

the view at the hearing that AT&T never established that Qwest's conduct harmed CLECs, or AT&T and its putative local entry plans, in any way.[93]

In short, this is a dispute from another state that has already been resolved. But it also does not "relate to the openness of the local telecommunications markets to competition," the FCC's requirement for an "unusual circumstance" that would justify a decision to "deny or delay [a section 271] application under the public interest standard."[94]

In fact, AT&T's attempt to smuggle the Minnesota testing dispute into the public interest inquiry in other states has been repeatedly rejected elsewhere. For example, the Washington Commission recently held that AT&T's UNE-P testing argument was unpersuasive because "[t]he Minnesota decision arises from events that occurred in Minnesota, not Washington state, and are therefore not relevant to our evaluation in this proceeding."[95] Similarly, the Multistate Facilitator found that the Minnesota dispute "do[es] not provide substantial evidence of a predictive, patterned refusal or inability of Qwest to comply with its wholesale service obligations," and does not constitute "the kind of unique circumstances that the FCC believes it takes to support a finding that Qwest's entry into the in-region, interLATA market would contravene the public interest."[96] Likewise, the Chairman of the Colorado PUC specifically considered the Minnesota ALJ's decision[97] and declared that this dispute, together with the rest of AT&T's evidence of alleged misconduct, failed to demonstrate "any 'pattern' of anticompetitive behavior in Colorado that is foreseeable to take place in the future or implicate

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[93] *See* Hearing Transcript, May 14, 2002, *In the Matter of the Complaint of AT&T Communications of the Midwest, Inc., Against Qwest Corporation*, Docket No. P-421/C-01-391). *See also id.* at 35:4-17 (statement of Commissioner Koppendrayer); 20:15-18 (statement of Commissioner Garvey); 37:11-15 (statement of Commissioner Reha).

[94] *Verizon New Jersey Order* ¶ 190.

[95] *Washington Final Order* ¶ 302.

[96] Multistate Facilitator's Public Interest Report at 9.

welfare enhancement."[98] Indeed, the Chairman went on to say that AT&T's efforts merely "highlight[] the heightened expectations that parties have in a public interest inquiry to sling as much as they can on the wall to see what will stick."[99] Idaho, Iowa, and Wyoming have also found the Minnesota UNE testing complaint to be irrelevant to their public interest inquiries,[100] and Qwest respectfully asks this Commission to do the same.

2. Touch America

AT&T next notes that Touch America has filed two complaints against Qwest with the FCC, and urges the Commission to delay making a recommendation on the pubic interest until these complaints are resolved.[101] The Commission has already rejected Touch America's own effort to inject these FCC complaints into this proceeding,[102] and the arguments hardly fare any better coming from AT&T. Touch America's as-yet-unadjudicated complaints do not involve local competition issues at all. They involve the scope of the FCC's Qwest-U S WEST merger approval order and related federal law questions about the interLATA market already appropriately before the FCC. As discussed above, the FCC has made clear that disputes that

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[97] *Colorado Order* at 43.

[98] *Id.* at 45.

[99] *Id.* at 44.

[100] *See, e.g.*, Commission Decision on Qwest Corporation's Compliance with Section 271 Public Interest and Track A Requirements and Section 272 Standards, Idaho Public Utilities Comm'n, *In the Matter of U S West Communications, Inc.'s Motion for an Alternative Procedure To Manage Its Section 271 Application*, Case No. USW-T-00-3 (April 19, 2002), at 10 (finding that the Minnesota testing dispute (and other public interest issues) had been "properly addressed in the Facilitator's Report") (Idaho); Iowa Report at 27 (finding that "none of Qwest's past actions, as noted in this record [including the Minnesota testing dispute], should be considered predictive of future behavior or contrary to the public interest") (Iowa); Wyoming Order at 7 (stating that, contingent upon certain QPAP revisions and completion of the OSS test, the Commission "agree[s] with the comments of the Consultant in the Workshop Report that Qwest has satisfied the generalized public interest requirement of the federal Act") (Wyoming).

[101] *See* AT&T Brief at 17-18.

[102] *See* Order Denying Motion to Reopen Record; Order Denying Petition to Intervene; Order Extending Briefing Schedule, *In the Matter of the Analysis into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996*, at 2 (June 27, 2002).

have not been shown to "relate to the openness of the local telecommunications markets to competition" should not be addressed as part of the section 271 proceeding.[103]

The complaints made by Touch America allege that Qwest's in-region dark fiber and lit fiber IRU transactions (1) amount to the provision of in-region interLATA services in violation of section 271, and (2) violate the terms of the FCC's U S WEST-Qwest merger orders regarding divestiture of such services. As noted above, the FCC has made clear that disputes arising from BOC merger orders that are currently being considered in its complaint dockets are best resolved in those other pending dockets, and not in connection with section 271 applications.[104] The FCC has also rejected an attempt to address issues in a section 271 docket that relate to "open issues before [the] Commission" in another proceeding.[105] And it has expressly rejected the idea that the section 271 process should "resolve all complaints, *regardless of whether they relate to local competition*, as a precondition to granting a section 271 application."[106] Touch America's complaints have demonstrated no relationship to such local competition issues in South Dakota, involve a dispute about the scope of the FCC's own merger orders, and should not be interjected into this wholly separate 271 application proceeding.

All those commissions in Qwest's region that have considered the issue have agreed. The Arizona Staff determined that because Touch America's complaints "are currently pending with the FCC and no ruling has yet been rendered," it "[could not] conclude at this time that

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[103] *Verizon New Jersey Order* ¶ 190.

[104] *See* Memorandum Opinion and Order, *Application of Verizon New York Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Connecticut*, 16 FCC Rcd ¶ 79 (2001) ("Verizon Connecticut Order") (noting that concerns with "Verizon's compliance with the conditions of the Bell Atlantic/GTE merger . . . [should] be appropriately addressed in the Commission's" merger audit proceedings, not the public interest inquiry).

[105] *BellSouth Georgia/Louisiana Order* ¶ 208.

[106] *Id.* ¶ 305 (emphasis added).

granting Qwest 271 relief is inconsistent with the public interest."[107] The Iowa Commission noted that Touch America's complaints are "only 'allegations,' which have been taken to the FCC for resolution."[108] The Nebraska Commission likewise held that "it is for the FCC to determine the validity" of Touch America's complaints,[109] while the North Dakota Commission found that the FCC "will decide the issues [relating to Touch America] and their significance, if any, regarding a Qwest section 271 application."[110] The Montana, New Mexico, Idaho, Washington and Wyoming Commissions have reached similar conclusions.[111]

In any event, Touch America's complaints are without merit. As Qwest has demonstrated to the FCC,[112] the FCC previously approved the Qwest transactions at issue, in

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[107] Arizona Staff's Proposed Report on Qwest's Compliance with Public Interest and Track A, *Qwest Corporation's Section 271 Application*, Docket No. T-00000A-97-0238, at 75 (May 1, 2002).

[108] Order Denying Petition to Intervene and Motion to Reopen Proceedings, *In Re: U S WEST Communications, Inc., n/k/a Qwest Corporation*, Iowa Utilities Board, Docket Nos. INU-002, SPU-00-11, at 6 (Jun. 11, 2002).

[109] Motion to Intervene and to Reopen Proceedings Denied, *In the Matter of Qwest Corporation, Denver, Colorado, filing its notice of intention to file its Section 271(c) application with the FCC and request for the Commission to verify Qwest compliance with Section 271(c)*, Nebraska Public Service Comm'n, Application No. C-1830 (June 12, 2002).

[110] Transcript of Special Meeting, *U S West Communications, Inc. Section 271 Compliance Investigation*, North Dakota Public Service Comm'n, Case No. PU-314-97-193, at 2-3 (June 13, 2002).

[111] Preliminary Report on Qwest's Compliance with the Public Interest Requirement, *In the Matter of the Investigation into Qwest's Corporation's Compliance with Section 271 of the Telecommunications Act of 1996*, Montana Public Service Comm'n, Docket No. D2005.70, at 25 (Feb. 14, 2002) (finding that "the FCC is the proper regulatory agency to decide the complaint and the complaint's significance vis-à-vis Qwest's expected 271 bid."); Order, *In the Matter of Qwest Corporation's Section 271 Application and Motion for Alternative Procedure to Manage the Section 271 Process*, New Mexico Public Regulation Comm'n, Utility Case No. 3269, at 9 (Apr. 16, 2002) (noting that issues with respect to Touch America are "already the subject of ongoing proceedings before the FCC"); Commission Final Decision on Qwest Corporation's Compliance with Section 271, *In the Matter of U S WEST Communications, Inc.'s Motion for an Alternative Procedure to Manage Its Section 271 Application*, Idaho Public Utilities Comm'n, Case No. USW-T-00-3, at 8 (Jun. 10, 2002) (finding that "it is for the FCC to determine the validity of Touch America's complaints and their effect, if any, on Qwest's application for interLATA authority"); *Washington Final Order* ¶¶ 277-79; Order Denying Touch America Petition to Intervene and Motion to Reopen Issues, *In the Matter of the Application of Qwest Corporation Regarding Relief Under Section 271 of the Federal Telecommunications Act of 1996 , Wyoming's Participation in a Multi-state Section 271 Process, and Approval of Its Statements of Generally Available Terms*, Wyoming Public Service Comm'n, Docket No. 70000-TA-00-599, at 3 (Jun. 17, 2002) (holding that the issue raised by Touch America is a "federal issue that is already properly before the FCC" and that it "is not relevant to our determination of issues legitimately before us").

[112] For a more comprehensive treatment of these arguments, see Answer of Defendants Qwest Communications International Inc., Qwest Corporation, and Qwest Communications Corporation, *Touch America,*

light of Qwest's formal Divestiture Compliance Report detailing the aspects of its plans for complying with section 271 prior to the merger. That report specifically stated that Qwest was not planning to unwind any pre-existing sales of IRUs "both for the conveyance of dark fiber and for the conveyance of lit fiber capacity," and that it "intend[ed] to continue selling similar telecommunications facilities in the future."[113] The FCC subsequently concluded: "Based upon the description of the customers, services and assets being transferred to Touch America," the "proposed divestiture . . . will ensure that Qwest will not provide prohibited in-region interLATA services."[114] Qwest has also demonstrated to the FCC in response to Touch America's complaints that the sale of IRUs constitutes the conveyance of network facilities, not the provisioning of "telecommunications services." As the FCC has held, "the one-time transfer of ownership and control of an interLATA network is not an interLATA service, which means it falls entirely outside the section 271/272 framework that governs interLATA services."[115] The FCC is reviewing these matters to determine whether Qwest's interpretation of the FCC's own orders, and the provisions of federal law, are reasonable. These complaints are already being addressed in the appropriate forum, and should not be included as part of some "*et cetera*" to the section 271 inquiry.[116]

Inc. v. Qwest Communications International Inc., FCC File No. EB-02-MD-003 (Mar. 4, 2002).

113 Divestiture Compliance Report, *Qwest Communications International Inc. and U S WEST, Inc., Applications for Transfer of Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License*, FCC CC Docket No. 99-272, at 28-30 (filed Apr. 14, 2000).

114 Memorandum Opinion and Order, *Qwest Communications International Inc. and U S WEST, Inc.*, 15 FCC Rcd 11909 ¶¶ 5, 13 (2000).

115 *See, e.g.*, Second Order on Reconsideration, *Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as Amended*, 12 FCC Rcd 8653 ¶ 54 n.110 (1997).

116 Colorado Order at 22.

3. "Qwest's Anticompetitive Corporate Attitude"

Finally, AT&T complains that "an anti-competitive attitude pervades the ranks, from top to bottom at Qwest."[117] Section 271 is not an inquiry into the BOC's "attitude" toward its CLEC competitors. It is addressed to BOC conduct. The Track A and public interest tests, as well as the adoption of a performance assurance plan and a Statement of Generally Available Terms and Conditions that complies with the fourteen-point competitive checklist, are the mechanisms for guaranteeing that a BOC's *conduct* will promote a competitive environment after a BOC wins section 271 approval. Charges that a "Qwest does not really consider its CLEC-customer business to be at all important"[118] have no bearing on this inquiry. And they in no way justify importing to Qwest in South Dakota the particularized conditions imposed on SBC by the Texas Public Utilities Commission, as urged by AT&T.[119] Indeed, the Administrative Law Judge presiding over the public interest proceeding in Minnesota noted that he "d[id]n't think that the relationship [between SBC and CLECs] in Texas has anything to do with the relationship in Minnesota."[120]

In any event, AT&T provides no support for its claim. It first cites to the other issues it has already raised in its brief.[121] However, as explained above, these are good-faith disputes and in no way represent some sort of anticompetitive corporate mind-set. AT&T goes on to list a number of other examples of Qwest's supposed "discriminatory and anticompetitive acts" in bullet point form, but makes no attempt to provide any evidence supporting these assertions.

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117 AT&T Brief at 18.

118 *Id.* at 19.

119 *Id.* at 20-22.

120 Transcript, *In the Matter of a Commission Investigation into Qwest's Compliance with Section 271(d)(3)(C) of the Telecommunications Act of 1996 That the Requested Authorization is Consistent with the Public Interest, Convenience and Necessity*, MN Public Utilities Comm'n, PUC Docket No. P-421/CI-01-1371 (May 28, 2002) at 134:15-17.

Moreover, the internal Qwest e-mail discussing Covad's decision to file for Chapter 11 bankruptcy protection cited by AT&T does not demonstrate the existence of any sort of corporate "attitiude." As Qwest witness David L. Teitzel explained in his rebuttal affidavit,[121] the Qwest employee that drafted and sent the e-mail, Linda Broberg, was a Grade 5 manager in product market intelligence organization, and therefore had no authority to establish Qwest policy in any way. A senior Qwest executive has apologized for the incident, and Ms. Broberg was reprimanded for sending the e-mail because her comments violated Qwest's policies with respect to its competitors. The e-mail was sent only to Qwest employees, and not to any customers, financial analysts, venture capitalists, or any other person or entity who might be prejudiced by the news of Qwest's reaction, and it does not mention any act or omission on behalf of Qwest that would have caused Covad's problems. Any suggestion that the e-mail reflects a Qwest policy or strategy to harm CLECs is without merit. The Washington Commission has agreed: "The e-mail in question is just one e-mail, and by itself, does not establish a "pattern" of behavior by Qwest. . . . We do not find this e-mail to be the kind of unusual circumstance that would weigh against a public interest finding."[122]

IV. CONCLUSION

For all the foregoing reasons and those stated in Qwest's opening brief, Qwest respectfully asks the Commission to find that Qwest's application to provide interLATA services in South Dakota is "consistent with the public interest, convenience, and necessity," within the meaning of 47 U.S.C. § 271(d)(3)(C) and the FCC orders interpreting that section.

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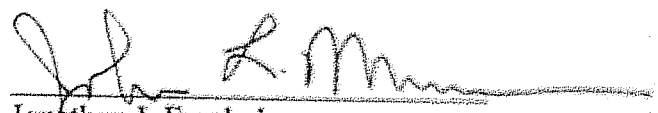
121 *See* AT&T Brief at 18-19.

122 *See* Teitzel Rebuttal (Qwest Ex. 2) at 66 n.141.

Dated this 16th day of July, 2002

RESPECTFULLY SUBMITTED,



Jonathan J. Frankel
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037-1420
(202) 663-6113

John Munn
1801 California Street, Suite 4900
Denver, CO 80202
(303) 672-5823

Attorneys for Qwest Corporation

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123 *Washington Final Order* ¶ 307.

CONTINUATION

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BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE ANALYSIS INTO QWEST CORPORATION'S COMPLIANCE WITH SECTION 271 (C) OF THE TELECOMMUNICATIONS ACT OF 1996	))))	DOCKET TC 01-165

QWEST CORPORATION'S POST-HEARING REPLY BRIEF REGARDING CHANGE MANAGEMENT

Qwest Corporation ("Qwest") submits this reply brief in response to AT&T's Brief Regarding Qwest's Change Management Process ("AT&T's Brief").

I. INTRODUCTION

AT&T claims that Qwest's CMP does not satisfy the FCC's section 271 evaluation criteria because: (1) Qwest has not established an adequate pattern of compliance with its redesigned process; (2) KPMG raised issues relating to Qwest's CMP in the ROC OSS test; (3) Qwest and the CLECs have not reached final agreement on the redesigned voting process; and (4) Qwest does not offer a stable test environment that mirrors production. The evidence Qwest produced in its affidavits and at the hearing demonstrates that AT&T is wrong on each of these points.

II. DISCUSSION

A. The core provisions of Qwest's Wholesale CMP have been implemented for more than seven months, during which Qwest compiled a 99% compliance rate.

Qwest has submitted a matrix detailing Qwest's compliance with its CMP obligations to assist the Commission in that exercise. Exhibit B to the Affidavit of Judith Schultz Regarding

Change Management, submitted April 2, 2002, is a matrix[1] that catalogues Qwest's compliance with each of the sections of Qwest's Wholesale Change Management Process Document ("Wholesale CMP").[2] The matrix shows that the core provisions of the redesigned process have been in effect for more than seven months. The matrix also lists each of the timeframes and Qwest deliverables in the Wholesale CMP -- each of which was defined and agreed to through the redesign process -- along with specific information detailing Qwest's record of compliance with those obligations. As fully described by Judith Schultz at the hearing[3] and in her affidavit, Qwest has compiled an impressive overall compliance rate of nearly 99%.

Qwest has also agreed to implement processes that no other RBOC has established. These processes include expanding the scope of CMP to include product/process issues, allowing CLECs to postpone Qwest-initiated and CLEC-initiated product/process changes, and the Special Change Request Process or SCRP, among other things. Qwest's agreement to additional provisions that expand the scope of its CMP far beyond that of other RBOCs should not be used against it. Instead, this Commission should review Qwest's actual compliance with the implemented process.

B. Qwest has adequately addressed the ROC OSS test Exceptions and Evaluation Criteria relating to CMP.

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[1] The current version of the matrix can be found on Qwest's wholesale web site at a link entitled Change Management Process Improvements at http://www.qwest.com/wholesale/cmp/redesign.html

[2] The current version of Qwest's Wholesale CMP can be found on the "What is CMP?" page of Qwest's wholesale web site at http://www.qwest.com/wholesale/cmp/whatiscmp.html

[3] *See* Transcript of Hearing, April 22, 2002, p. 189.

AT&T suggests that the Commission should ensure that Qwest has adequately addressed the results of the ROC OSS test relating to CMP. As set forth below, Qwest has done so.

There were seven criteria in Test 23, relating to the process for CMP, for which KPMG was unable to determine whether Qwest satisfied the test requirements. As an initial matter, it is important to note that AT&T mischaracterizes the seven "unable to determine" results as constituting a failure rate of 38.88%. First, an "unable to determine" result does not constitute a failure. If Qwest failed to satisfy a criterion, KPMG assigned a result of "not satisfied." There were no "not satisfied" results in Test 23; instead, there were seven criteria for which KPMG was simply unable to determine whether Qwest had satisfied the test requirements.

The seven Test 23 criteria for which KPMG was unable to determine whether Qwest satisfied the test requirements relate to Exception 3094, which was closed/unresolved, and Exceptions 3110 and 3111, both of which were closed/inconclusive. As set forth below, KPMG has observed Qwest's compliance with its CMP with regard to the issues raised in each of these three Exceptions.

1. Exception 3094

Exception 3094 resulted from an initial interim process for product/process changes that Qwest and CLECs developed during the early redesign sessions. That uncertainty has been resolved by the redesign team's completed agreement on a detailed process for product/process changes. Qwest has fully implemented the agreed-upon process.[4] However, KPMG was

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[4] The process for Qwest-initiated product/process changes is set forth in section 5.4 of Qwest's Wholesale Change Management Process Document ("Wholesale CMP"), which can be found on the "What is CMP?" page of Qwest's wholesale web site at www.Qwest.com/wholesale/CMP/whatiscmp.html.

unwilling to close this Exception in a resolved status because it was unable to evaluate the new process in practice.

Because final agreement regarding this process was reached on April 16, 2002, Qwest requested that KPMG conducted limited retesting to observe the redesigned process. KPMG did so. KPMG observed that Qwest complied with the redesigned process in issuing all five of the product/process notices KPMG observed after April 16, 2002. Nonetheless, KPMG refused to close this Exception in a resolved status because of the "relatively few notifications issued since April 16, 2002 under the new process."[5] KPMG also cited the redesign team's continuing discussions regarding the process for postponing a product/process change, claiming that this process is relevant to this Exception.[6] KPMG again recommended that this Exception be closed in an unresolved status.

It is important to note that KPMG's retest did establish that Qwest adhered to its redesigned process during the period KPMG observed. Nonetheless, adherence to this process is not required because the FCC has not required a BOC to establish a process for managing product/process changes. KPMG's reliance on the postponement process Qwest has agreed to implement imposes an additional requirement on Qwest that exceeds the FCC's requirements. No other BOC has implemented a process similar to the product/process postponement process, which allows CLECs to postpone Qwest's implementation of product/process changes. Because both the product/process provisions of Qwest's CMP and the postponement process to which

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5 *See* Disposition Report for Exception 3094, available at www.ant.ohio-state.edu/oss/master/exceptions/may/ e3094supplemental_disposition_report.pdf

6 As noted above, the redesign team has now resolved all of the priority issues identified by the CLECs and incorporated specific provisions into the Wholesale CMP regarding each issue that required language, including the postponement process.

KPMG refers far exceed the FCC's CMP criteria, these issues do not affect Qwest's compliance with the FCC's section 271 criteria for change management.

2. Exception 3110

In Exception 3110, KPMG expressed concern that Qwest's CMP managers do not employ a centralized mechanism to track and ensure that documentation release intervals are followed for upcoming software releases. KPMG reviewed Qwest's internal process documents and verified that software and product/process documentation teams have procedures to prepare documents and distribute them in accordance with the intervals specified in the redesigned process. KPMG was thus satisfied that Qwest had implemented procedures to ensure that it complies with its release notification intervals. However, because KPMG had not observed adherence to the documented process for notification interval management, KPMG recommended that Exception 3110 be closed as inconclusive.

As with Exception 3094, Qwest requested that KPMG conduct limited retesting to observe the redesigned process. KPMG observed eight release notifications between April 4, 2002 and May 3, 2002. Qwest complied with its process in each instance. Nonetheless, KPMG again determined that it was unable to conclusively verify Qwest's consistent adherence to the stated CMP intervals and recommended that this Exception 3110 be closed in an inconclusive status. In addition, KPMG expressed concern regarding the number of changes Qwest made to its OSS Release Calendar, noting that Qwest issued ten versions of the calendar in the five-month period from January through May 2002.[7]

KPMG's concern regarding Qwest's updates to its OSS Release Calendar is puzzling.

Section 6.0 of Qwest's Wholesale CMP provides that Qwest will provide a rolling 12-month OSS Release Calendar with specified information. Qwest must post the calendar on its web site, and provide it on a quarterly basis to the CLECs that receive the CMP monthly meeting materials. It would be inconsistent with the purpose of this calendar for Qwest not to update the calendar. Qwest believes it has appropriately updated the calendar to provide CLECs with appropriate notice regarding upcoming releases.

In addition, PO-16 measures the timeliness of Qwest's release notifications. For PO-16, Qwest met the PID for four of the past five months.[8] In January and March, Qwest issued a timely release notification in each month. In April and May, Qwest issued five out of five release notifications on a timely basis.

As with Exception 3094, KPMG's retest established that Qwest adhered to its redesigned process during the period KPMG observed. In fact, Qwest has complied with 100% of the OSS interface release documentation interval notification deadlines that have occurred thus far. This is consistent with Qwest's overall nearly 99% compliance rate on its CMP obligations. Qwest's record of compliance, coupled with its success in adhering to the very notification intervals that are the subject of the Exception, demonstrate that Qwest's tracking and verification procedures are adequate.

3. Exception 3111

Exception 3111 relates to Qwest's process for prioritizing and packaging CRs for major IMA releases. KPMG observed the prioritizing and packaging process for IMA Releases 10.0

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7 *See* Disposition Report for Exception 3110, available at www.ant.ohio-state.edu/oss/master/exceptions/may/ e3110supplemental_disposition_report.pdf

and 11.0. However, because it observed portions of the processes for each release, KPMG believed that Qwest did not comply with the CMP processes for three specific reasons: Regulatory Changes were not prioritized for IMA Release 10.0, Qwest did not provide CLECs with total capacity information prior to the prioritization votes on IMA 10.0, and that Qwest did not participate in the prioritization process for IMA 10.0. In its responses to this Exception, Qwest addressed all three of these issues.

First, there were Regulatory CRs in both the IMA 10.0 and 11.0 Releases that were subject to the prioritization process as defined at that time for Regulatory CRs, which included "above the line" treatment -- meaning that Regulatory CRs appeared at the top of the list of CRs to which resources are assigned. In addition, both the IMA 10.0 and 11.0 Releases included ordinary normal CRs that were subjected to the prioritization process as ranked CRs -- meaning that those CRs were ranked below the Regulatory CRs. Thus, KPMG had ample opportunity to review the prioritization process for both types of CRs.

The fact that Qwest and the CLECs were at impasse over whether PID/PAP related CRs should be treated as Regulatory CRs or as normal CRs during the prioritization process for the IMA 10.0 and 11.0 Release did not affect KPMG's ability to evaluate Qwest's adherence to the prioritization process. The resolution of this issue did not change the prioritization process itself, but simply determined which path ("above the line" or ranked) an individual CR will take through the process. KPMG has already observed both paths.

Second, Qwest provided the CLECs with the total capacity of the IMA 11.0 Release prior to the packaging. Thus, KPMG was able to observe Qwest's adherence to the process in that

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8 Qwest has restated its PO-16 results in order to accurately report information regarding the release

respect. Third, Qwest demonstrated that it did participate in the prioritization process for IMA 10.0.

Thus, the issues KPMG raised did not prevent KPMG from observing Qwest's adherence to the various aspects of the prioritization and packaging process. However, because KPMG had not observed Qwest's adherence to the complete end-to-end prioritization and packaging process for a single major system release, KPMG recommended that this Exception be closed as inconclusive. KPMG has already observed Qwest's adherence to each phase of the prioritization and packaging processes for major system releases that were in place and agreed to via CMP at the time of executing the process. These observations demonstrated Qwest's compliance with the process.

C. The CMP is Operating Using the Existing Voting Process.

Finally, AT&T claim that the Commission should not approve Qwest's CMP until the redesign team reaches final agreement regarding voting language, claiming that this issue has "taken on greater significance." Contrary to these claims, the voting issue does not raise significant issues. In fact, the redesign team reached final agreement regarding those provisions on July 10, 2002. Moreover, as more fully discussed below, these new provisions relate only to the logistics of how a vote is actually conducted.

As an initial matter, the parties to the redesign process have resolved all of the priority issues identified by the CLECs. The redesign team first reached agreement in principle on all issues, then developed and incorporated specific provisions regarding each issue that required language into the CMP Framework. Significantly, AT&T has conceded that once all of the

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that fall within the PO-16 definition.

significant issues listed by the CLECs were resolved -- as they now are -- there are no remaining issues to be resolved for section 271 purposes regarding Qwest's change management process.[9] The following exchange took place between the Administrative Law Judge and AT&T witness Mitchell Menezes in a proceeding before the Washington Utilities and Transportation Commission:

> JUDGE RENDAHL: I have a macro-level question for the CLECs. And I guess this is really addressed to you, Mr. Menezes, because it's raised in Exhibit 1540. And I want to confirm that the issues that are in your Exhibit 1540, AT&T and the CLECs agreed that if these issues are resolved to their satisfaction, that these are the issues that if they are resolved, then there is no issue for section 271 purposes with the change management process; is that correct?
>
> MR. MENEZES: You referred to Exhibit 1540, which is the --
>
> JUDGE RENDAHL: I am sorry. 1539.
>
> MR. MENEZES: Okay. Yes. With 1539 that is what we have said. That's what we have said in our Arizona filing, and we have said here.

Thus, according to AT&T, there are now no unsatisfied issues relating to the existence or content of Qwest's change management process for section 271 purposes.

With regard to the voting language, it is important to note that no CLEC identified this issue as a priority issue in the redesign process. Nonetheless, AT&T claim -- without

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[9] *In the Matter of the Investigation into US WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996 and In the Matter of US WEST Communications, Inc.'s Statement of*

explanation -- that critical aspects of the CMP cannot be implemented until the voting language is finalized. This claim has no merit. The voting language does not relate to defining the issues upon which a vote will be taken. CLECs and Qwest have reached agreement on the circumstances under which a vote is required, how the CLECs are informed about votes, and how issues are determined based on a vote (i.e., whether a simple majority, a specified majority, or unanimity is required). These processes are already defined in the Wholesale CMP.[10] Accordingly, there are no aspects of the CMP that Qwest could not implement until the voting language was revised.

In contrast, the provisions recently agreed to relate only to the logistics of how a vote is actually conducted, including whether and how a quorum must be constituted, how representatives are designated for voting purposes, what the ballot looks like, and how Qwest tallies and informs the CMP body of the results. The redesign team reached final agreement on this issue on July 10, 2002. However, these issues did not hinder or even affect the operations of Qwest's CMP prior to that time. A voting process has been in place since the inception of the Co-Provider Industry Change Management Process ("CICMP"), the predecessor of Qwest's CMP. Generally, Qwest seeks consensus. If consensus could not be reached a vote was taken and a simple majority ruled. Thus, when the Wholesale CMP provided that a vote is to be taken on any particular issues, the vote was taken and the decision was made based on the votes cast by the parties present at that time. In fact, such votes were taken during the May and June 2002 monthly CMP meetings to determine whether certain systems change requests ("CRs") should be

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Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996, Docket Nos. UT 003022 and UT 003040, Transcript Volume LI (Pages 7452 to 7528) ("Washington Proceeding"), at 07513-07514.

10 *See* Wholesale CMP, sections 2.1, 5.1.2, 5.2.2, 5.4.3.1, 5.4.4.1, and 16.

treated as Industry Guideline or Regulatory changes, in accordance with the Wholesale CMP. Similarly, in March 2002, votes were taken to determine whether certain product/process CRs should be treated on an exception basis.

As noted above, the new voting provisions were finalized on July 10, 2002. Prior to that time, the CMP operated using the existing voting process. The fact that the redesign team was crafting new procedures to govern the logistics of voting had no impact on the ongoing operation of the CMP. Qwest will now implement the new provisions as soon as practicable and the CMP will continue to operate under those provisions.

D. Qwest provides a stable testing environment that mirrors production.

Effective August 1, 2001, Qwest began offering CLECs a stand-alone test environment as part of certification that CLEC systems will interface with Qwest's IMA-EDI systems and for subsequent testing of new releases of IMA-EDI software.

SATE provides CLECs with the ability to learn how Qwest's IMA-EDI functions work and the ability to test their skills in a test environment that returns test responses to pre-defined test scenarios that mimic production responses. Qwest provides the account data and scenario information to users through the IMA EDI Data Document for SATE. Scenario submissions do not leave SATE during testing. By providing CLECs with a self-contained, production-like environment for sending transactions, CLECs have the opportunity to experience an environment that acts as production IMA – the gateway to Qwest's OSS – would without interfacing with the

actual production environment. SATE uses test account data and requests that are subjected to the same IMA-EDI edits as those used in production.[11]

A SATE Users' Group meets regularly under the aegis of the Change Management Process to discuss SATE-related issues and to recommend, as appropriate, changes to SATE. The SATE Users' Group was formed in November 2001 as part of CMP and includes representatives from HP, KPMG, Qwest, and the CLEC community. The purpose of the SATE Users' Group is to give Qwest and CLECs an opportunity to communicate their current plans and needs, respectively, as well as to jointly present a list of change requests to CMP that ensures that those future SATE enhancements meet the needs of CLECs.[12]

In addition, to ensure that CLECs have the functionality available in SATE that they require, CLECs may request through the CMP that Qwest include additional products and functionality in its suite of SATE transactions.[13]

At the hearing, Qwest presented testimony regarding the adequacy of its stand alone test environment ("SATE").[14] AT&T did not present any evidence at the hearing to rebut Qwest's

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[11] *See* EDI Disclosure Document, Developer Worksheets, available at <http://www.uswest.com/disclosures/netdisclosure409.html>.

[12] *See* SATE Users' Group Meeting Minutes, November 13, 2001. In addition to the SATE Users' Group, individual CLEC's can request changes to SATE.

[13] *See* EDI Implementation Guidelines, available at <http://www.qwest.com/wholesale/ima/edi/document.html>. The process states that "additional functionality can be agreed upon and added in later releases. Requests for transactions not currently supported may be requested via CMP." *See id.*

[14] *See* Transcript of Hearing, April 22, 2002, p. 157.

testimony. The issue was further discussed at the recent hearing on the results of the OSS test. During that hearing, KPMG testified that it had two concerns with SATE, (1) the fact that it did not support flow through, and (2) the fact that not all products are supported in SATE. During that hearing, Qwest presented evidence that it has addressed both concerns. First, Qwest explained that, after the test was complete, it implemented flowthrough for SATE. Second, Qwest explained that it has given the CLECs the opportunity to prioritize products for inclusion in SATE, and that it has scheduled implementation in the next available release the implementation of the only two products that were not prioritized at the bottom of the list.

Qwest built SATE to provide products and transactions that are currently being ordered by CLECs through IMA-EDI.[15] Qwest continues to monitor the products that CLECs express interest in and has proactively added products or created CMP change requests ("CRs") to add products to SATE. For example, Qwest agreed to add Unbundled Distribution Loop and Unbundled Distribution Loop with Number Portability to SATE for HP's new product evaluation, as Qwest anticipated future EDI implementation of these products. Qwest created a CR to add Facility Based Directory Listings to SATE, a product that was added to IMA-EDI in January 2002.[16]

Thus, Qwest has demonstrated that it has addressed the concerns raised by KPMG and that SATE meets the FCC's requirements. The fact that more than twenty CLECs are certified to

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[15] The list of products can be found in the EDI Implementation Guidelines, available at <http://www.qwest.com/wholesale/ima/edi/document.html>.

[16] CLECs have the ability to prioritize SATE CRs; thus the timing of the addition of new products to SATE is not entirely within Qwest's control.

use EDI and that Hewlett-Packard successfully utilized Qwest's documentation to build its own EDI interface as part of third party OSS testing are both strong indicators of the efficacy of Qwest's test environments. AT&T presented **no** evidence, at either hearing, to support its contention that SATE is not sufficient.

III. CONCLUSION

Qwest's change management process fully satisfies each of the requirements of the FCC's Section 271 evaluation. AT&T has not raised any issue that alters that result.

Dated this 16th day of July, 2002.

Respectfully submitted,

Andrew D. Crain
Qwest Corporation
1801 California Street, Suite 4900
Denver, Colorado 80202
(303) 672-2926
Attorney for Qwest Corporation

Qwest Exhibit 92
Responses to issues raised in Attachment A of Staff's Response Brief

	ISSUE DESCRIPTION	SGAT SECTION	FOOTNOTE	RESPONSE
1	Section 6.2.6 Facilitator's Report (AZ workshop) CLEC may not reserve blocks of Qwest telephone numbers except as allowed by a Federal Communications Commission order. Tariffs. First Revised SGAT and Second Revision The parties may not reserve blocks of telephone numbers except as allowed by Applicable Law or regulation. On the record a statement was made that AZ and CO held workshops before the multi state, i.e., facilitator's report. Where did this language change come from?	6.2.6	N/A (no change between Nov. 2001 SGAT and May 20, 2002 SGAT)	This language came from the workshop one "Frozen" SGAT filed in the multi-state proceeding on March 9 2001. Pursuant to a general rule adopted by the Facilitator, Qwest filed the "Frozen" SGAT to reflect language on which there was general agreement among the parties and language proposed by Qwest to address issues or language on which there was not general agreement. (*See* Ex. 23, p. 3.)
2	Second Report - Workshop One 5/15/2001 page 32 - 2. Entrance Facilities as Interconnection Points. On page 33 "Qwest should change the SGAT here to reflect this commitment." Redlined Second Revision has no footnote regarding the Washington order, therefore can not tell if the S.D. SGAT picks up the Facilitator's Resolution.	7.1.2.1	None	The original SGAT complied with the resolution, so there was no amendment.
3	Paper Workshop Issues 3/19/2001 Issues Resolved During This Workshop page 13 - 9. Inspection Costs "Qwest has agreed to delete the Section 10.8.2.16 provision that disclaims such liability." Can not tell if this has taken place. [Original SGAT, First Revision SGAT, and Second Revision SGAT all read the same.]	10.8.2.16		The change to SGAT § 10.8.2.16 occurred before the Paper Workshop Report, Ex. 27, was issued and before Qwest filed its SGAT in South Dakota. In the version of the SGAT used in the Colorado workshop on June 6, 2000, the Washington workshop on June 21, 2000, and the Oregon workshop on August 9, 2000, Qwest deleted the words "...impose any liability of any kind upon U S WEST nor..." following the phrase "shall not" in section 10.8.2.16. This deletion satisfied the parties involved in the workshops at that time. On October 13, 2000, Dom Sekich, who filed testimony on behalf of AT&T in the mutistate proceedings, summarized changes to 10.8.2.16 that had occurred before the paper workshop. The Paper Workshop Report repeated Sekich's summary in the list of issues that had been resolved. The South Dakota SGAT contains the agreed changes so no further changes are reflected in the SGAT revisions.
4	Page 7, Footnote 8: The name of the CLEC questionnaire has been changed to "New Customer	3.1	8	The change reflects a Qwest internal name change for the questionnaire. Since it was a non-substantive change to the name

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	ISSUE DESCRIPTION	SGAT SECTION	FOOTNOTE	RESPONSE
	Questionnaire". Which state(s) agreed with this change? When was this determined? Which companies agreed with this change?			of a document, CLECs were not consulted on the name change.
5	Footnotes 13, 20, 21, 33, 36, 37, 42 and 44. This change reflects post workshop consensus language. For each footnote, provide the following information: Which state(s) agreed with this change? When was this determined? Which companies agreed with this change?	4.0 (fn.13 "Binder Groups"; fn.20 "Customer Premises Equipment"; fn.21 "Dedicated Transport"; fn.33 "Ordering and Billing Forum"; fn.36 "Proof of Authorization"; fn.37 "Remote Premises"; fn.42 "Voluntary Subscriber Financial Assistance Programs"); 5.2.2	13, 20, 21, 33, 36, 37, 42, and 44	These definitions were negotiated with CLECs, primarily AT&T and WorldCom, throughout the workshop process with consensus reached in the fall of 2001. No state has opposed these definitions.
6	Footnote 16 Facilitator's Report on Workshop One page 49, 5th and 6th line from bottom. "Qwest generally agreed with the changes to SGAT Section 4..." Only change in the Report is to "Collocation". Need further support for this change.	4.0 "Tandem Office Switches"	16	Pursuant to the Workshop One Report, Ex. 23, at pp. 109-110, Qwest agreed to amend the definition of tandem switch to reflect that a CLEC's switch will be treated as a tandem switch for reciprocal compensation purposes if the CLEC's switch meets the functional and geographic requirements of a tandem switch.

Qwest Exhibit 92
Responses to issues raised in Attachment A of Staff's Response Brief

	ISSUE DESCRIPTION	SGAT SECTION	FOOTNOTE	RESPONSE
	Page 21 - Miscellaneous Charges The redlined version indicates the 2nd line and the 5th line changed in some manner. What changed?	4.0 ("Miscellaneous Charges")	None	A hyphen was deleted between "non" and "recurring".
	Page 23 - Percent Local Usage The redlined version indicates that something changed on the last line. What changed?	4.0 "Percent Local Usage"	None	A paragraph marker was added to the end of the definition to ensure space between it and the next definition.
	Footnote 47 - AT&T's request in the S.D. Docket or some other state? Explain.	5.4.6	47	This agreement was made in Colorado and is reflected in a Colorado supplemental filing dated March 8, 2002.
	Footnote 48 - Where in Attachment 31 can this language revision be found?	5.4.8	48	Attachment 31 (Ex. 26), is the General Terms and Conditions, Section 272 & Track A Report issued in the multistate process on September 21, 2001. The language does not appear in Attachment 31. It comes from the frozen SGAT that accompanied Attachment 31 in the multistate proceedings.
	Footnote 58 - Where in Attachment 31 can this language revision be found?	5.18.2	58	The new language was inadvertently omitted from the previous SGAT filing and brings section 5.18.2 into compliance with the *Multi State GTC Frozen SGAT lite* that accompanied the Facilitator's Report issued September 21, 2001 (Attachment 31, Ex. 26). According to Attachment 31, at p. 22, "[t]he frozen SGAT [§ 5.18] reflects a substantial rewrite of this SGAT Section, incorporating many of the suggested AT&T changes. No participant briefed this issue, which, therefore, can be considered closed."
	Footnote 67 - Facilitator Report, Workshop One page 39 – "Qwest made a substantial change in this provision." No language was shown in the Report. Provide support for the revision made to the SGAT.	7.2.2.8.6	67	The SGAT was revised by moving a sentence from section 7.2.2.8.6 to section 7.2.2.8.6.1, but the revision had no substantive effect.
	Footnote 68 – references Footnote 67, where no revised language is shown. Why not reference Freeberg, Qwest Exhibit 15, page 14 which shows revised language?	7.2.2.8.6.1	68	The redlined SGAT typically does not cite to testimony because testimony is subject to change (e.g., paragraph numbers, page numbers, refinement of language, etc.)
	Section 7.2.2.8.12 – see Freeberg, Qwest Exhibit15, page 15 when [sic] in Freeberg agrees that this	7.2.2.8.12	71, 72, 73	SGAT §§ 7.2.2.8.12.3 and 7.2.2.8.12.4 were deleted.

	ISSUE DESCRIPTION	SGAT SECTION	FOOTNOTE	RESPONSE
	section should be removed. What then would happen to Sections 7.2.2.8.12.1, 7.2.2.8.12.2, 7.2.2.8.12.3 and 7.2.2.8.12.4? Section 7.2.2.8.12.2 was revised to reflect post AZ workshop consensus Section 7.2.2.8.12.3 was revised to reflect post AZ workshop consensus [deleted] Section 7.2.2.8.12.4 was revised to reflect post AZ workshop consensus [deleted]			
5	Footnote 86 - Where does this language come from?	7.3.6.2.2.1.	86	The language reflects consensus reached by AT&T, Worldcom, and Qwest in the Montana workshops.
6	Footnote 92 - Complies with the Workshop One Frozen SGAT page 29 - "Qwest made several detail changes to the section..." No language was provided. Provide support for the modifications made.	7.4.1	92	The modification was made at the request of AT&T in order to reconcile SGAT § 7.4.1 with the Qwest "Interexchange Carrier Resource Guide" to assure that the required information for ordering would be supplied.
7	Footnote 94 – "Qwest agreed to this modification in the collocation workshop..." Which state(s) agreed with this change? When was this determined? Which companies agreed with this change?	8.3.1.11.1.2	94	It appears the change came from the Washington workshops on November 28-29, 2000 (Consensus), and the Arizona workshops on August 16-18, 2000 (Consensus).
8	Footnotes 95, 96 and 97 – "... result of post Arizona Workshop (Consensus)." For each footnote, provide the following information: Which state(s) agreed with this change? When was this determined? Which companies agreed with this change?	8.4.1.4.1	95, 96, 97	In the General Terms and Conditions workshops and in the Arizona workshops, the participants agreed that forecast should come under the heading of Terms and Conditions (SGAT § 5.0) rather than Collocation (SGAT § 8.0). Therefore, the nondisclosure requirements were moved to SGAT § 5.16.9.
9	Footnote 107 – "Qwest agreed to bring this language into South Dakota during the April 2002 Hearings." Which witness? If not in rebuttal affidavit, where on the record can this modification be found?	9.2.2.8	107	This agreement is referenced in the direct testimony of Barbara Brohl dated April 22, 2002, p.232-233 as well as the Rebuttal Affidavit of Jean M. Liston (Ex. 13).
9	Section 9.3.3.5 The second insert is taken from Karen A. Stewart, Qwest Exhibit 66, page 24. Where does the first insert come from?	9.3.3.5	108	The first insert brings the South Dakota SGAT into conformity with the Final Emerging Services Frozen SGAT "lite" filed in the multistate proceeding.

Qwest Exhibit 92
Responses to issues raised in Attachment A of Staff's Response Brief

	ISSUE DESCRIPTION	SGAT SECTION	FOOTNOTE	RESPONSE
21	Footnote 110 – "Qwest agreed to bring this language into South Dakota during the April 2002 Hearings." Which witness? If not in rebuttal affidavit, where on the record can this modification be found?	9.4.5.1.4.1	110	This language came out of New Mexico workshops and is referenced in the direct testimony of Karen A.Stewart dated April 24, 2002, pp.219-220.
22	Footnote 113 - Which state(s) agreed with this change? When was this language agree upon? Which companies agreed with this language?	9.6.2.6	113	It is unclear what workshop this came out of, but this agreed change directly benefits CLECs.
23	Footnote 115 - Which state(s) agreed with this change? When was this language agree upon? Which companies agreed with this language?	9.7.2.9	115	This language makes a clarification that is consistent with the Facilitator's UNE Report (Ex. 25), and directly benefits CLECs.
24	Footnote 117 - Which state(s) agreed with this change? When was this language agree upon? Which companies agreed with this language?	9.20.2.1.2	117	This language was requested by CLECs, is CLEC-friendly, and is consistent with the requirements of the Facilitator's Emerging Services Report (Ex. 24) at pp.42-44.
25	Footnote 118 - Which state(s) agreed with this change? When was this language agree upon? Which companies agreed with this language?	9.20.2.9	118	Qwest's agreement to this amendment is noted in the Facilitator's Emerging Services Report (Ex. 24) at p. 46.
26	Footnote 119 - Which state(s) agreed with this change? When was this language agree upon? Which companies agreed with this language?	9.20.3.4	119	In the early workshops, packet switching was provided by ICB pricing. The Emerging Services Report (Ex. 24) p. 9, notes that Qwest agreed that ICB pricing will not remain the general rule because of pending price development efforts. SGAT § 9.20.3.4 reflects the fact that Qwest is engaged in a pending cost docket to establish permanent rates.
27	Footnote 120 - Which state(s) agreed with this change? When was this language agree upon? Which companies agreed with this language?	9.20.4.1	120	The amendment, which benefits CLECs, resulted from a request by Staff from either North Dakota or New Mexico to ensure parallel processing of packet switching orders with collocation orders (SGAT § 8.4).
28	Section 9.23.1.2.3 see Karen A. Stewart, Qwest Exhibit 64, page 26, lines 18 to 22 change "DS1" to "high capacity" Footnote 121 - Where does "similar bandwidth" come from? It is not in the Facilitator's Report	9.23.1.2.3	121	The language came out of the New Mexico workshops.

	ISSUE DESCRIPTION	SGAT SECTION	FOOTNOTE	RESPONSE
	Attachment 30, page 87.			
29	Section 10.3.4.6 "Arizona language is added as Qwest added" Where in the record was this agreed to be placed in the SGAT?	10.3.4.6	129	The agreement is reflected in the Affidavit of Margaret Bumgarner dated April 23, 2002 at p. 77-80, and Ex. 43, which contains the Arizona language.
30	Section 10.3.9.4.2 see Bumgarner, Qwest Exhibit 33, Exhibit MSB-911-6, page 4 of 6 1.4.2 within the above exhibit - The last sentence was dropped. Explain why.	10.3.9.4.2	None	Qwest agreed to delete that sentence during a Minnesota hearing on March 4-6, 2002 because there is consensus indemnification language in the General Terms and Conditions section of the SGAT.
31	See Freeberg, Qwest Exhibit 17, pages 8 and 9. Sections 10.8.2.27, 10.8.2.27.1, 10.8.2.27.2, 10.8.2.27.3 and 10.8.2.27.4 were not incorporated into the Second Revision SGAT. Explain why.	10.8.2.27, 10.8.2.27.1, 10.8.2.27.2, 10.8.2.27.3 and 10.8.2.27.4	None	The SGAT did not change. In Tom Freeberg's testimony, Qwest indicated that it believed the current SGAT language complied with the Facilitator's report but Qwest was willing to modify the language as indicated if required by the Commission.
32	See Freeberg, Qwest Exhibit 17, page 9. Section 10.8.4.1.3 was not incorporated into the Second Revision SGAT. Explain why.	10.8.4.1.3	None	Same as above.
33	Footnotes 142, 143, 146, 147, 148, 149, 150, 152, 156, 162, 164, 165, 166, 167, 169, 171 and 172 - "... reflects post workshop language..." For each footnote, provide the following information: Which state(s) agreed with this change? When was this determined? Which companies agreed with this change?	142-12.1.1; 143-12.2.1.2 146: 12.2.1.4.10 147: 12.2.1.7.1 148: 12.2.1.9.2 149: 12.2.1.9.3 150: 12.2.2.2 152: 12.2.2.3	142, 143, 146, 147, 148, 149, 150, 152, 156, 162, 164, 165, 166, 167, 169, 171 and 172	These changes were negotiated and agreed upon in Colorado and were contained in a Colorado supplemental filing dated February 6, 2002. Qwest, WorldCom and AT&T agreed to the changes.

	ISSUE DESCRIPTION	SGAT SECTION	FOOTNOTE	RESPONSE
		156: 12.2.5.2.7 162: 12.2.8.3 164: 12.2.9.3.3 165: 12.2.9.3.5 166: 12.2.9.4 167: 12.2.9.5 169: 12.2.9.6.1.3 171: 12.2.10.1 172: 12.2.10.2.1.2		
54	Footnote 158 – "... agreed upon the redlined language in the Change Management Redesign Sessions Which state(s) agreed with this change? When was this determined? Which companies agreed with this change?	12.2.6	158	At the last CMP redesign meeting, on May 22, 2002, the team reached final agreement on the language for SGAT § 12.2.6. The agreement was reached as part of the redesign effort, not in a docket in any particular state. CLECs that are actively part of the redesign team include AT&T, WorldCom, Covad, Allegiance, and Eschelon.

Exhibit K
PERFORMANCE ASSURANCE PLAN

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1.0 Introduction

1.1 As set forth in this Agreement, Qwest and CLEC voluntarily agree to the terms of the following Performance Assurance Plan ("PAP"), prepared in conjunction with Qwest's application for approval under Section 271 of the Telecommunications Act of 1996 (the "Act") to offer in-region long distance service.

2.0 Plan Structure

2.1 The PAP is a two-tiered, self-executing remedy plan. CLEC shall be provided with Tier 1 payments if, as applicable, Qwest does not provide parity between the service it provides to CLEC and that which it provides to its own retail customers, or Qwest fails to meet applicable benchmarks.

2.1.1 As specified in section 7.0, if Qwest fails to meet parity and benchmark standards on an aggregate CLEC basis, Qwest shall make Tier 2 payments to a Fund established by the state regulatory commission or, if required by existing law, to the state general fund.

2.2 As specified in sections 6.0 and 7.0 and Attachments 1 and 2, payment is generally on a per occurrence basis, (i.e., a set dollar payment times the number of non-conforming service events). For the performance measurements which do not lend themselves to per occurrence payment, payment is on a per measurement basis, (i.e., a set dollar payment). The level of payment also depends upon the number of consecutive months of non-conforming performance, (i.e., an escalating payment the longer the duration of non-conforming performance).

2.3 Qwest shall be in conformance with the parity standard when service Qwest provides to CLEC is equivalent to that which it provides to its retail customers. The PAP relies upon statistical scoring to determine whether any difference between CLEC and Qwest performance results is significant, that is, not attributable to simple random variation. Statistical parity shall exist when performance results for CLEC and for Qwest retail analogue result in a z-value that is no greater than the critical z-values listed in the Critical Z-Statistics Table in section 5.0

2.4 For performance measurements that have no Qwest retail analogue, agreed upon benchmarks shall be used. Benchmarks shall be evaluated using a "state and compare" method. For example, if the benchmark for a particular performance measurement is 95%, or better, Qwest performance results must be at least 95% to meet the benchmark. Percentage benchmarks will be adjusted to round the allowable number of misses up or down to the closest integer, except when a benchmark standard and low CLEC volume are such that a 100% performance result would be required to meet the standard and has not been attained.

In such a situation, the determination of whether Qwest meets or fails the benchmark standard will be made using performance results for the month in question, plus a sufficient number of consecutive prior months so that a 100% performance result would not be required to meet the standard. For purposes of section 6.2, a meet or fail determined by this procedure shall count as a single month. In cases where there is insufficient prior data to determine if the standard has been met or missed using this "look-back" procedure, Qwest shall be allowed to round the product of the benchmark and the sample size up to one, such that one miss would be permitted.

3.0 Performance Measurements

3.1 The performance measurements included in the PAP are set forth in Attachment 1. Each performance measurement identified is defined in the Performance Indicator Definitions ("PIDs") developed in the ROC Operational Support System ("OSS") collaborative, and which are included in the SGAT at Exhibit B. The measurements have been designated as Tier 1, Tier 2, or both Tier 1 and Tier 2 and given a High, Medium, or Low designation.

4.0 Statistical Measurement

4.1 Qwest uses a statistical test, namely the modified "z-test," for evaluating the difference between two means (i.e., Qwest and CLEC service or repair intervals) or two percentages (e.g., Qwest and CLEC proportions), to determine whether a parity condition exists between the results for Qwest and the CLEC(s). The modified z-tests shall be applicable if the number of data points are greater than 30 for a given measurement. For testing measurements for which the number of data points are 30 or less, Qwest will use a permutation test to determine the statistical significance of the difference between Qwest and CLEC.

4.2 Qwest shall be in conformance when the monthly performance results for parity measurements (whether in the form of means, percents, or proportions and at the equivalent level of disaggregation) are such that the calculated z-test statistics are not greater than the critical z-values as listed in Table 1, section 5.0.

4.3 Qwest shall be in conformance with benchmark measurements when the monthly performance result equals or exceeds the benchmark, if a higher value means better performance, and when the monthly performance result equals or is less than the benchmark if a lower value means better performance.

The formula for determining parity using the modified z-test is:

$$z = DIFF / \sigma_{DIFF}$$

Where:

$$DIFF = M_{Qwest} - M_{CLEC}$$

M_{QWEST} = Qwest average or proportion

M_{CLEC} = CLEC average or proportion

σ_{DIFF} = square root $[\sigma^2 Qwest\ (1/n_{CLEC} + 1/n_{Qwest})]$

σ^2_{Qwest} = calculated variance for Qwest

n_{Qwest} = number of observations or samples used in Qwest measurement

n_{CLEC} = number of observations or samples used in CLEC measurement

The modified z-tests will be applied to reported parity measurements that contain more than 30 data points.

In calculating the difference between Qwest and CLEC performance, the above formula applies when a larger Qwest value indicates a better level of performance. In cases where a smaller Qwest value indicates a higher level of performance, the order is reversed, i.e., $M_{CLEC} - M_{QWEST}$.

4.3.1 For parity measurements where the number of data points is 30 or less, Qwest will apply a permutation test to test for statistical significance. Permutation analysis will be applied to calculate the z-statistic using the following logic:

Calculate the modified z-statistic for the actual arrangement of the data
Pool and mix the CLEC and Qwest data sets
Perform the following 1000 times:
Randomly subdivide the pooled data sets into two pools, one the same size as the original CLEC data set (n_{CLEC}) and one reflecting the remaining data points, and one reflecting the remaining data points, (which is equal to the size of the original Qwest data set or n_{Qwest}).
Compute and store the modified z-test score (Z_A) for this sample.
Count the number of times the z-statistic for a permutation of the data is greater than the actual modified z- statistic
Compute the fraction of permutations for which the statistic for the rearranged data is greater than the statistic for the actual samples

If the fraction is greater than α, the significance level of the test, the hypothesis of no difference is not rejected, and the test is passed. The α shall be .05 when the critical z value is 1.645 and .15 when the critical z value is 1.04.

5.0 Critical Z-Value

5.1 The following table shall be used to determine the critical z-value that is referred to in section 6.0. It is based on the monthly business volume of the CLEC for the particular performance measurements for which statistic testing is being performed.

TABLE 1: CRITICAL Z-VALUE

CLEC volume (Sample size)	LIS Trunks, UDITs, Resale, UBL-DS1 and DS-3	All Other
1-10	1.04*	1.645
11-150	1.645	1.645
151-300	2.0	2.0
301-600	2.7	2.7
601-3000	3.7	3.7
3001 and above	4.3	4.3

* The 1.04 applies for individual month testing for performance measurements involving LIS trunks and DS-1 and DS-3 that are UDITs, Resale, or Unbundled Loops. The performance measurements are OP-3d/e, OP-4d/e, OP-5, OP-6-4/5, MR-5a/b, MR-7d/e, and MR-8. For purposes of determining consecutive month misses, 1.645 shall be used. Where performance measurements disaggregate to zone 1 and zone 2, the zones shall be combined for purposes of statistical testing.

6.0 Tier 1 Payments to CLEC

6.1 Tier 1 payments to CLEC shall be made solely for the performance measurements designated as Tier 1 on Attachment 1. The payment amount for non-conforming service varies depending upon the designation of performance measurements as High, Medium, and Low and the duration of the non-conforming service condition as described below. Non-conforming service is defined in section 4.0.

6.1.1 Determination of Non-Conforming Measurements: The number of performance measurements that are determined to be non-conforming and, therefore, eligible for Tier 1 payments, are limited according to the critical z-value shown in Table 1, section 5.0. The critical z-values are the statistical standard that determines for each CLEC performance measurement whether Qwest has met parity. The critical z-value is selected from Table 1 according to the monthly CLEC volume for the performance measurement. For instance, if the CLEC sample size for that month is 100, the critical z-value is 1.645 for the statistical testing of that parity performance measurement.

6.2 Determination of the Amount of Payment: Tier 1 payments to CLEC, except as provided for in sections 6.3 and 10.0, are calculated and paid monthly based on the number of performance measurements exceeding the critical z-value. Payments will be made on either a per occurrence or per measurement basis, depending upon the performance measurement, using the dollar amounts specified in Table 2 below. The dollar amounts vary depending upon whether the performance measurement is designated High, Medium, or Low and

escalate depending upon the number of consecutive months for which Qwest has not met the standard for the particular measurement.

6.2.1 The escalation of payments for consecutive months of non-conforming service will be matched month for month with de-escalation of payments for every month of conforming service. For example, if Qwest has four consecutive monthly "misses" it will make payments that escalate from month 1 to month 4 as shown in Table 2. If, in the next month, service meets the standard, Qwest makes no payment. A payment "indicator" de-escalates down from month 4 to month 3. If Qwest misses the following month, it will make payment at the month 3 level of Table 2 because that is where the payment "indicator" presently sits. If Qwest misses again the following month, it will make payments that escalate back to the month 4 level. The payment level will de-escalate back to the original month 1 level only upon conforming service sufficient to move the payment "indicator" back to the month 1 level.

6.2.2 For those performance measurements listed on Attachment 2 as "Performance Measurements Subject to Per Measurement Caps," payment to a CLEC in a single month shall not exceed the amount listed in Table 2 below for the "Per Measurement" category. For those performance measurements listed on Attachment 2 as "Performance Measurements Subject to Per Measurement Payments," payment to a CLEC will be the amount set forth in Table 2 below under the section labeled "per measurement."

TABLE 2: TIER-1 PAYMENTS TO CLEC

Per Occurrence Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6 and each following month
High	$150	$250	$500	$800	$700	$800
Medium	$ 75	$150	$300	$400	$500	$600
Low	$ 25	$ 50	$100	$200	$300	$400

Per Measurement Cap Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6 and each following month
High	$25,000	$50,000	$75,000	$100,000	$125,000	$150,000
Medium	$10,000	$20,000	$30,000	$ 40,000	$ 50,000	$ 60,000
Low	$ 5,000	$10,000	$15,000	$ 20,000	$ 25,000	$ 30,000

6.3 For collocation, CP-2 and CP-4 performance measurements shall be relied upon for delineation of collocation business rules. For purposes of calculating Tier 1 payments, collocation jobs and collocation feasibility studies that are later than the due date will have a per day payment applied according to Table 3. The per day payment will be applied to any collocation job in which the feasibility study is provided or the collocation modification is

completed later than the scheduled date. The calculation of the payment amount will be performed by applying the per day payment amounts as specified in Table 3. Thus, for days 1 through 10, the payment is $150 per day. For days 11 through 20, the payment is $300 per day and so on.

TABLE 3: TIER-1 COLLOCATION PAYMENTS TO CLECS

Days Late	Completion Date	Feasibility Study
1 to 10 days	$150/day	$45/day
11 to 20 days	$300/day	$90/day
21 to 30 days	$450/day	$135/day
31 to 40 days	$600/day	$180/day
More than 40 days	$1,000/day	$300/day

6.4 A minimum payment calculation shall be performed at the end of each year for each CLEC with annual order volumes of no more than 1,200. The payment shall be calculated by multiplying $2,000 by the number of months in which at least one payment was made to the CLEC. To the extent that the actual CLEC payment for the year is less than the product of the preceding calculation, Qwest shall make an additional payment equal to the difference.

7.0 Tier 2 Payments to the State

7.1 Payments to the State shall be limited to the performance measurements designated in section 7.4 for Tier 2 per measurement payments and in Attachment 1 for per occurrence payments and which have at least 10 data points each month for the period payments are being calculated. Similar to the Tier 1 structure, Tier 2 measurements are categorized as High, Medium, and Low and the amount of payments for non-conformance varies according to this categorization.

7.2 Determination of Non-Conforming Measurements: The determination of non-conformance will be based upon the aggregate of all CLEC data for each Tier 2 performance measurement. Non-conforming service is defined in section 4.2 (for parity measurements) and 4.3 (for benchmark measurements), except that a 1.645 critical *z*-value shall be used for all parity measurements but MR-2 and OP-2. The critical *z*-value is the statistical standard that determines for each performance measurement whether Qwest has met parity.

7.3 Determination of the Amount of Payment: Except as provided in section 7.4, Tier 2 payments are calculated and paid monthly based on the number of performance measurements failing performance standards for a third consecutive month, or if two out of three consecutive months in the 12 month period have been missed, the second consecutive month for Tier 2 measurements with Tier 1 counterparts and one month for Tier 2 measurements that do not have Tier 1 counterparts. Payment will be made on either a per occurrence or per measurement basis, whichever is applicable to the performance measurement, using the dollar amounts specified in Table 4 or Table 5 below. Except as provided in section 7.4, the dollar

amounts vary depending upon whether the performance measurement is designated High, Medium, or Low.

7.3.1 For those Tier 2 measurements listed on Attachment 2 as "Performance Measurements Subject to Per Measurement Caps," payment to the State in a single month shall not exceed the amount listed in Table 4 for the "Per Measurement" category.

TABLE 4: TIER-2 PAYMENTS TO STATE FUNDS

Per Occurrence

Measurement Group	
High	$5,000
Medium	$3,000
Low	$2,000

Per Measurement/Cap

Measurement Group	
High	$75,000
Medium	$50,000
Low	$25,000

7.4 Performance Measurements Subject to Per Measurement Payment: The following Tier 2 performance measurements shall have their performance results measured on a region-wide (14 state) basis. Failure to meet the performance standard, therefore, will result in a per measurement payment in each of the Qwest in-region 14 states adopting this PAP. The performance measurements are:

GA-1: Gateway Availability - IMA-GUI
GA-2: Gateway Availability - IMA-EDI
GA-3: Gateway Availability – EB-TA
GA-4: System Availability – EXACT
GA-6: Gateway Availability – GUI-Repair
PO-1: Pre-Order/Order Response Times
OP-2: Call Answered within Twenty Seconds – Interconnect Provisioning Center
MR-2: Calls Answered within Twenty Seconds – Interconnect Repair Center

GA-1 has three sub-measurements: GA-1A, GA-1B, and GA-1C. PO-1 shall have two sub-measurements: PO-1A and PO-1B. PO-1A and PO-1B shall have their transaction types aggregated together.

For these measurements, Qwest will make a Tier 2 payment based upon monthly performance results according to Table 5: Tier 2 Per Measurement Payments to State Funds.

TABLE 5: TIER-2 PER MEASUREMENT PAYMENTS TO STATE FUNDS

Measurement	Performance	State Payment	14 State Payment
GA-1,2,3,4,6	1% or lower	$1,000	$14,000
	>1% to 3%	$10,000	$140,000
	>3% to 5%	$20,000	$280,000
	>5%	$30,000	$420,000

PO-1	2 sec. Or less	$1,000	$14,000
	>2 sec. to 5 sec.	$5,000	$70,000
	>5 sec. to 10 sec.	$10,000	$140,000
	>10 sec.	$15,000	$210,000
OP-2/MR-2	1% or lower	$1,000	$14,000
	>1% to 3%	$5,000	$70,000
	>3% to 5%	$10,000	$140,000
	>5%	$15,000	$210,000

7. 5 Payment of Tier 2 Funds: Payments to a state fund shall be used for any purpose determined by the Commission that is allowed to it by state law. Until such time as the North Dakota Legislature determines the uses by the Commission of Tier 2 funds, Tier 2 payments shall be made to the ND Performance Assurance Fund as set forth in QPAP Section 11.3 and its subsections. Upon the effective date of legislation, the receipt and administration of Tier 2 funds shall be as directed by the North Dakota Legislature.

8.0 Step by Step Calculation of Monthly Tier 1 Payments to CLEC

8.1 Application of the Critical Z-Values: Qwest shall identify the Tier 1 parity performance measurements that measure the service provided to CLEC by Qwest for the month in question and the critical z-value from Table 1 in section 5.0 that shall be used for purposes of statistical testing for each particular performance measurement. The statistical testing procedures described in section 4.0 shall be applied. For the purpose of determining the critical z-values, each disaggregated category of a performance measurement is treated as a separate sub-measurement. The critical z-value to be applied is determined by the CLEC volume at each level of disaggregation or sub-measurement.

8.2 Performance Measurements for which Tier 1 Payment is Per Occurrence:

8.2.1 Performance Measurements that are Averages or Means:

8.2.1.1 Step 1: For each performance measurement, the average or the mean that would yield the critical z-value shall be calculated. The same denominator as the one used in calculating the z-statistic for the measurement shall be used. (For benchmark measurements, the benchmark value shall be used.)

8.2.1.2 Step 2: The percentage differences between the actual averages and the calculated averages shall be calculated. The calculation is % diff = (CLEC result – Calculated Value)/Calculated Value. The percent difference shall be capped at a maximum of 100%. In all calculations of percent differences in sections 8.0 and 9.0, the calculated percent differences is capped at 100%.

8.2.1.2 Step 3: For each performance measurement, the total number of data points shall be multiplied by the percentage calculated in the previous step and the per occurrence dollar

amounts from the Tier 1 Payment Table shall determine the payment to the CLEC for each non-conforming performance measurement.

8.2.2 Performance Measurements that are Percentages:

8.2.2.1 Step 1: For each performance measurement, the percentage that would yield the critical z-value shall be calculated. The same denominator as the one used in calculating the z- statistic for the measurement shall be used. (For benchmark measurements, the benchmark value shall be used.)

8.2.2.2 Step 2: The difference between the actual percentages for the CLEC and the calculated percentages shall be determined.

8.2.2.3 Step 3: For each performance measurement, the total number of data points shall be multiplied by the difference in percentage calculated in the previous step, and the per occurrence dollar amount taken from the Tier 1 Payment Table, to determine the payment to the CLEC for each non-conforming performance measurement.

8.2.3 Performance Measurements that are Ratios or Proportions:

8.2.3.1 Step 1: For each performance measurement the ratio that would yield the critical z-value shall be calculated. The same denominator as the one used in calculating the z-statistic for the measurement shall be used. (For benchmark measurements, the benchmark value shall be used.)

8.2.3.2 Step 2: The absolute difference between the actual rate for the CLEC and the calculated rate shall be determined.

8.2.3.3 Step 3: For each performance measurement, the total number of data points shall be multiplied by the difference calculated in the previous step, and the per occurrence dollar amount taken from the Tier 1 Payment Table, to determine the payment to the CLEC for each non-conforming performance measurement.

8.3 Performance Measurements for which Tier 1 Payment is Per Measure:

8.3.1 For each performance measurement where Qwest fails to meet the standard, the payment to the CLEC shall be the dollar amount shown on the "per measure" portion of Table 2: Tier 1 Payments to CLEC.

9.0 Step by Step Calculation of Monthly Tier 2 Payments to State Funds

9.1.1 Application of the Critical Z-Value: Qwest shall identify the Tier 2 parity performance measurements that measure the service provided by Qwest to all CLECs for the month in question. The statistical testing procedures described in section 4.0 shall be applied, except that a 1.645 critical z-value shall be used for all parity measurements but MR-2 and OP-2.

9.1.2 Tier 2 payments for performance measurements listed on Attachment 1 shall be made in the current month when 1) for Tier 2 measurements that have Tier 1 counterparts it is determined that Qwest missed the performance standard for a third month in any twelve-month period or 2) for Tier 2 measurements that do not have Tier 1 counterparts it is determined that Qwest missed the performance standard for a second month during any twelve-month period.

9.2 Performance Measurements for which Tier 2 Payment is Per Occurrence:

9.2.1 Performance Measurements that are Averages or Means:

9.2.1.1 Step 1: The monthly average or the mean for each performance measurement that would yield the critical z-value for each month shall be calculated. The same denominator as the one used in calculating the z-statistic for the measurement shall be used. (For benchmark measurements, the benchmark value shall be used.)

9.2.2.2 Step 2: The percentage difference between the actual averages and the calculated averages for each month shall be calculated . The calculation for parity measurements is % diff = (actual average – calculated average)/calculated average. The percent difference shall be capped at a maximum of 100%. In all calculations of percent differences in section 8.0 and section 9.0, the calculated percent difference is capped at 100%.

9.2.2.3 Step 3: For each performance measurement, the total number of data points each month shall be multiplied by the percentage calculated in the previous step. The average for three months (rounded to the nearest integer) shall be calculated and multiplied by the result of the per occurrence dollar amount taken from the Tier 2 Payment Table to determine the payment to the State for each non-conforming performance measurement.

9.3 Performance Measurements that are Percentages:

9.3.1 Step 1: For each performance measurement, the monthly percentage that would yield the critical z-value for each month shall be calculated. The same denominator as the one used in calculating the z-statistic for the measurement shall be used. (For benchmark measurements, the benchmark value shall be used.)

9.3.1.2 Step 2: The difference between the actual percentages and the calculated percentages for each of the three non-conforming months shall be calculated. The calculation for parity measurement is diff = (CLEC result – calculated percentage). This formula shall be applicable where a high value is indicative of poor performance. The formula shall be reversed where high performance is indicative of good performance.

9.3.1.3 Step 3: For each performance measurement, the total number of data points for each month shall be multiplied by the difference in percentage calculated in the previous step. The average for three months shall be calculated (rounded to the nearest integer) and multiplied by

the result of the per occurrence dollar amounts taken from the Tier 2 Payment Table to determine the payment to the State.

9.4 Performance Measurements that are Ratios or Proportions:

9.4.1 Step 1: For each performance measurement, the ratio that would yield the critical z-value for each month shall be calculated. The same denominator as the one used in calculating the z-statistic for the measurement shall be used. (For benchmark measurements, the benchmark value shall be used.)

9.4.1.1 Step 2: The difference between the actual rate for the CLEC and the calculated rate for each month of the non-conforming three-month period shall be calculated. The calculation is: diff = (CLEC rate – calculated rate). This formula shall apply where a high value is indicative of poor performance. The formula shall be reversed where high performance is indicative of good performance.

9.4.1.2 Step 3: For each performance measurement, the total number of data points shall be multiplied by the difference calculated in the previous step for each month. The average for three months shall be calculated (rounded to the nearest integer) and multiplied by the result of the per occurrence dollar amounts taken from the Tier 2 Payment Table to determine the payment to the State.

9.5 Performance Measurements for which Tier 2 Payment is Per Measure:

9.5.1 For each performance measurement where Qwest fails to meet the standard, the payment to the State Fund shall be the dollar amount shown on the "per measure" portion of the Tier 2 Payment Table.

10.0 Low Volume, Developing Markets

10.1 For certain qualifying performance standards, if the aggregate monthly volumes of CLECs participating in the PAP are more than 10, but less than 100, Qwest will make Tier 1 payments to CLECs for failure to meet the parity or benchmark standard for the qualifying performance sub-measurements. The qualifying sub-measurements are the UNE-P (POTS), megabit resale, and ADSL qualified loop product disaggregation of OP-3, OP-4, OP-5, MR-3, MR-5, MR-7, and MR-8. If the aggregate monthly CLEC volume is greater than 100, the provisions of this section shall not apply to the qualifying performance sub-measurement.

10.2 The determination of whether Qwest has met the parity or benchmark standards will be made using aggregate volumes of CLECs participating in the PAP. In the event Qwest does not meet the applicable performance standards, a total payment to affected CLECs will be determined in accordance with the high, medium, low designation for each performance measurement (see Attachment 1) and as described in section 8.0, except that CLEC aggregate volumes will be used. In the event the calculated total payment amount to CLECs is less than $5,000, a minimum payment of $5,000 shall be made. The resulting total payment amount to

CLECs will be apportioned to the affected CLECs based upon each CLEC's relative share of the number of total service misses.

10.3 At the six (6)-month reviews, Qwest will consider adding to the above list of qualifying performance sub-measurements, new products disaggregation representing new modes of CLEC entry into developing markets.

11.0 Payment

11.1 Payments to CLEC, the State, or the Special Fund shall be made one month following the due date of the performance measurement report for the month for which payment is being made. Qwest will pay interest on any late payment and underpayment at the prime rate as reported in the Wall Street Journal. On any overpayment, Qwest is allowed to offset future payments by the amount of the overpayment plus interest at the prime rate.

11.2 Payment to CLEC shall be made via bill credits. Bill credits shall be identified on a summary format substantially similar to that distributed as a prototype to the CLECs and the Commissions. To the extent that a monthly payment owed to CLEC under this PAP exceeds the amount owed to Qwest by CLEC on a monthly bill, Qwest will issue a check or wire transfer to CLEC in the amount of the overage. Payment to the State shall be made via check or wire transfer.

11.3 A ND Performance Assurance Fund shall be created for the purpose of receiving Tier 2 payments. A ND CLEC Tier 1 Fund shall be created for the purpose of receiving Tier 1 payments made under section 11.3.1.

11.3.1 Qwest shall establish the ND Performance Assurance Fund and the ND CLEC Tier 1 Fund as interest bearing escrow accounts upon FCC section 271 approval of the PAP. Qwest shall withhold and deposit into ND CLEC Tier 1 Fund one-fifth of all Tier 1 payments to CLECs that exceed the month 1 payment amounts in Table 2. Qwest shall deposit all Tier 2 payments into the ND Performance Assurance Fund. The cost of the escrow accounts will be paid for from account funds.

11.3.2 All charges against the funds shall be presented to the Commission. Disbursements shall first be from the ND Performance Assurance fund and second from the ND CLEC Tier 1 Fund. Not less than every two years, ND CLEC Tier 1 Fund amounts that are not used to meet continuing obligations shall be returned on a pro rata basis to CLECs.

11.3.3 Qwest shall advance, upon request, sufficient funds to any consolidated multistate Special Fund established by participating states, set up for the purpose of a regional audit as specified in sections 15.1-15.4 , not to exceed $200,000 (or $500,000 in the event 6 or more states participate in the regional audit) in order to meet initial claims against that fund to the extent that contributions from Tier 1 and/or Tier 2 payments directed to the fund by the participating states are insufficient. Qwest shall be allowed to recover any such advances plus

interest from the fund at the rate that such an escrow account would have earned from future Tier 2 payments.

12.0 Cap on Tier 1 and Tier 2 Payments

12.1 There shall be an annual cap on the total payments made by Qwest beginning with the effective date of the PAP for the State of North Dakota. The annual cap, beginning with the effective date of the PAP for the State of North Dakota, shall be 36% of the 1999 ARMIS Net Return (which is $13,000,000). Subsequent annual caps determined pursuant to section 12.2 and its subsections are expressed as a percent and are applied to Qwest's most recently reported ARMIS Net Return to determine the dollar amount of the annual cap. CLEC agrees that this amount constitutes a maximum annual cap that shall apply to the aggregate total of any Tier-1 liquidated damages (including any such damages paid pursuant to this Agreement or voluntary payments made by Qwest pursuant to any North Dakota interconnection agreement with a performance remedy plan) and Tier-2 Assessments or voluntary payments made by Qwest pursuant to any North Dakota interconnection agreement with a performance remedy plan.

12.2 The 36% annual cap may increase to 44% of ARMIS Net Return as follows:

12.2.1 An increase in the "existing annual cap" of 4 percentage points at any one time (i.e. first to 40 percent then to 44 percent) shall occur in cases where the cap would have been exceeded for any consecutive period of 24 months by that same 4 percent or more. Qwest may file a petition with the NDPSC seeking relief for payments exceeding the existing annual cap. Qwest will not be required to make payments in excess of the existing annual cap pending the outcome of the proceeding before the Commission. Qwest shall have the burden of establishing that it could not have remained below the existing annual cap through use of reasonable and prudent effort. If the Commission determines that Qwest should make payments in excess of the existing annual cap, Qwest shall make any and all payments that were suspended with interest.

12.2.2 A decrease in the existing annual cap of a maximum of 4 percentage points at any one time shall occur upon order by the Commission that it is appropriate to do so after performance for any consecutive period of 24 months which produces calculations of total payment responsibility that is 8 or more percentage points (i.e., 26 percent or less) below the cap amount for that period, provided that:

a. the Commission shall determine that the preponderance of the Qwest evidence shows the performance results underlying those payment calculations results from an adequate Qwest commitment to meeting its responsibilities to provide adequate wholesale service and to keeping open its local markets, and

b. the Commission shall have made that determination after providing all interested parties an opportunity to be heard.

12.2.3 The provisions of 12.2.1 and 12.2.2 shall be applicable to the next 24 month period commencing at the completion of the first, provided that the maximum annual cap shall be 44 percent; the minimum annual cap shall be 36 percent.

12.3 If the annual cap is reached, each CLEC shall, as of the end of the year, be entitled to receive the same percentage of its total calculated Tier 1 payments. In order to preserve the operation of the annual cap, the percentage equalization shall take place as follows:

12.3.1 The amount by which any month's total year-to-date Tier 1 and Tier 2 payments exceeds the sum of the year-to-date monthly caps (a month's cap is defined as $1/12^{th}$ of the annual cap in effect during that month) shall be calculated and apportioned between Tier 1 and Tier 2 according to the percentage that each bore of total payments for the year-to-date. The Tier 1 apportionment resulting of this calculation shall be known as the "Tracking Account."

12.3.2 The Tier 1 apportionment shall be debited against the monthly payment due to each CLEC, by applying to the year-to-date payments received by each the percentage necessary to generate the required total Tier 1 amount.

12.3.3 The Tracking Amount shall be apportioned among all CLECs so as to provide each with payments equal in percentage of its total year to date Tier 1 payment calculations.

12.3.4 This calculation shall take place in the first month that the year-to-date total Tier 1 and Tier 2 payments are expected to exceed the cumulative monthly cap and for each month of that year thereafter. Qwest shall recover any debited amounts by reducing payments due to any CLEC for that month and any succeeding months, as necessary.

13.0 Limitations

13.1 The PAP shall not become available in the State unless and until Qwest receives effective section 271 authority from the FCC for that State.

13.2 Qwest will not be liable for Tier 1 payments to CLEC in an FCC approved state until the Commission has approved an interconnection agreement between CLEC and Qwest which adopts the provisions of this PAP.

13.3 Qwest shall not be obligated to make Tier 1 or Tier 2 payments for any measurement if and to the extent that non-conformance for that measurement was the result of any of the following: 1) with respect to performance measurements with a benchmark standard, a Force Majeure event as defined in section 5.7 of the SGAT. Qwest will provide notice of the occurrence of a Force Majeure event within 72 hours of the time Qwest learns of the event or within a reasonable time frame that Qwest should have learned of it; 2) an act or omission by a CLEC that is contrary to any of its obligations under its interconnection agreement with Qwest or under federal or state law; an act or omission by CLEC that is in bad faith. Examples of bad faith conduct include, but are not limited to: unreasonably holding service

orders and/or applications, "dumping" orders or applications in unreasonably large batches, "dumping" orders or applications at or near the close of a business day, on a Friday evening or prior to a holiday, and failing to provide timely forecasts to Qwest for services or facilities when such forecasts are explicitly required by the SGAT; 3) problems associated with third-party systems or equipment, which could not have been avoided by Qwest in the exercise of reasonable diligence, *provided, however*, that this third party exclusion will not be raised in the State more than three times within a calendar year. If a Force Majeure event or other excusing event recognized in this section merely suspends Qwest's ability to timely perform an activity subject to a performance measurement that is an interval measure, the applicable time frame in which Qwest's compliance with the parity or benchmark criterion is measured will be extended on an hour-for-hour or day-for-day basis, as applicable, equal to the duration of the excusing event.

13.3.1 Qwest will not be excused from Tier 1 or Tier 2 payments for any reason except as described in Section 13.0. Qwest will have the burden of demonstrating that its non-conformance with the performance measurement was excused on one of the grounds described in this PAP. A party may petition the Commission to require Qwest to deposit disputed payments into an escrow account when the requesting party can show cause, such as grounds provided in the Uniform Commercial Code for cases of commercial uncertainty.

13.3.2 Notwithstanding any other provision of this PAP, it shall not excuse performance that Qwest could reasonably have been expected to deliver assuming that it had designed, implemented, staffed, provisioned, and otherwise provided for resources reasonably required to meet foreseeable volumes and patterns of demands upon its resources by CLECs.

13.4 Qwest's agreement to implement these enforcement terms, and specifically its agreement to pay any "liquidated damages" or "assessments" hereunder, will not be considered as an admission against interest or an admission of liability in any legal, regulatory, or other proceeding relating in whole or in part to the same performance.

13.4.1 CLEC may not use: 1) the existence of this enforcement plan; or 2) Qwest's payment of Tier –1 "liquidated damages" or Tier 2 "assessments" as evidence that Qwest has discriminated in the provision of any facilities or services under Sections 251 or 252, or has violated any state or federal law or regulation. Qwest's conduct underlying its performance measures, however are not made inadmissible by its terms.

13.4.2 By accepting this performance remedy plan, CLEC agrees that Qwest's performance with respect to this remedy plan may not be used as an admission of liability or culpability for a violation of any state or federal law or regulation. (Nothing herein is intended to preclude Qwest from introducing evidence of any Tier 1 "liquidated damages" under these provisions for the purpose of offsetting the payment against any other damages or payments a CLEC might recover.) The terms of this paragraph do not apply to any proceeding before the Commission or the FCC to determine whether Qwest has met or continues to meet the requirements of section 271 of the Act.

13.5 By incorporating these liquidated damages terms into the PAP, Qwest and CLEC accepting this PAP agree that proof of damages from any non-conforming performance measurement would be difficult to ascertain and, therefore, liquidated damages are a reasonable approximation of any contractual damages that may result from a non-conforming performance measurement. Qwest and CLEC further agree that Tier 1 payments made pursuant to this PAP are not intended to be a penalty. The application of the assessments and damages provided for herein is not intended to foreclose other noncontractual legal and non-contractual regulatory claims and remedies that may be available to a CLEC.

13.6 This PAP contains a comprehensive set of performance measurements, statistical methodologies, and payment mechanisms that are designed to function together, and only together, as an integrated whole. To elect the PAP, CLEC must adopt the PAP in its entirety in its interconnection agreement with Qwest in lieu of other alternative standards or relief for the same wholesale services governed by the QPAP. Where alternative standards or remedies for Qwest wholesale services governed by the QPAP are available under rules, orders, or contracts, including interconnection agreements, CLEC will be limited to either PAP standards and remedies or the standards and remedies available under rules, orders, or contracts and CLECs choice of remedies shall be specified in its interconnection agreement.

13.7 Any liquidated damages payment by Qwest under these provisions is not hereby made inadmissible in any proceeding related to the same conduct where Qwest seeks to offset the payments against any other damages a CLEC may recover; whether or not the nature of the damages sought by the CLEC is such that an offset is appropriate will be determined in the relevant proceeding.

13.8 Qwest shall not be liable for both Tier 2 payments under the PAP and assessments, sanctions, or other payments for the same underlying activity or omission pursuant to any Commission order or service quality rules.

13.9 Whenever a Qwest Tier 1 payment to an individual CLEC exceeds $3 million in a month, Qwest may commence a proceeding to demonstrate why it should not be required to pay any amount in excess of the $3 million. Upon timely commencement of the proceeding, Qwest must pay the balance of payments owed in excess of $3 million into escrow, to be held by a third-party pending the outcome of the proceeding. To invoke these escrow provisions, Qwest must file, not later than the due date of the Tier 1 payments, its application. Qwest will have the burden of proof to demonstrate why, under the circumstances, it would be unjust to require it to make the payments in excess of $3 million. If Qwest reports non-conforming performance to CLEC for three consecutive months on 20% or more of the measurements reported to CLEC and has incurred no more than $1 million in liability to CLEC, then CLEC may commence a similar proceeding. In any such proceeding CLEC will have the burden of proof to demonstrate why, under the circumstances, justice requires Qwest to make payments in excess of the amount calculated pursuant to the terms of the PAP. The disputes identified in this section shall be resolved in a manner specified in the Dispute Resolution section of the SGAT with the CLEC.

13.10 Qwest will not attempt to recover in intrastate rates payments made under the QPAP.

14.0 Reporting

14.1 Upon receiving effective section 271 authority from the FCC for a state, Qwest will provide CLEC that has an approved interconnection agreement with Qwest, a monthly report of Qwest's performance for the measurements identified in the PAP by the last day of the month following the month for which performance results are being reported. However, Qwest shall have a grace period of five business days, so that Qwest shall not be deemed out of compliance with its reporting obligations before the expiration of the five business day grace period. Qwest will collect, analyze, and report performance data for the measurements listed on Attachment 1 in accordance with the most recent version of the PIDs. Upon CLEC's request, data files of the CLEC's raw data, or any subset thereof, will be transmitted, without charge, to CLEC in a mutually acceptable format, protocol, and transmission medium.

14.2 Qwest will also provide the Commission a monthly report of aggregate CLEC performance results pursuant to the PAP by the last day of the month following the month for which performance results are being reported. However, Qwest shall have a grace period of five business days, so that Qwest shall not be deemed out of compliance with its reporting obligations before the expiration of the five business day grace period. Individual CLEC reports of participating CLECs will also be available to the Commission upon request. By accepting this PAP, CLEC consents to Qwest providing CLEC's report and raw data to the State Commission. Pursuant to the terms of an order of the Commission, Qwest may provide CLEC-specific data that relates to the PAP, provided that Qwest shall first initiate any procedures necessary to protect the confidentiality and to prevent the public release of the information pending any applicable Commission procedures and further provided that Qwest provides such notice as the Commission directs to the CLEC involved, in order to allow it to prosecute such procedures to their completion. Data files of participating CLEC raw data, or any subset thereof, will be transmitted, without charge, to the Commission in a mutually acceptable format, protocol, and transmission form.

14.3 In the event Qwest does not provide CLEC and the Commission with a monthly report by the last day of the month following the month for which performance results are being reported, Qwest will pay to the State a total of $500 for each business day for which performance reports are 6 to 10 business days past the due date; $1,000 for each business day for which performance reports are 11 to 15 business days past the due date; and $2,000 for each business day for which performance results are more than 15 business days past the due date. If reports are on time but are missing performance results, Qwest will pay to the State a total of one-fifth of the late report amount for each missing performance measurement, subject to a cap of the full late report amount. These amounts represent the total payments for omitting performance measurements or missing any report deadlines, rather than a payment per report. Prior to the date of a payment for late reports, Qwest may file a request for a waiver of the payment, which states the reasons for the waiver. The Commission may grant the waiver, deny the waiver, or provide any other relief that may be appropriate.

14.4 To the extent that Qwest recalculates payments made under this PAP, such recalculation shall be limited to the preceding three years (measured from the later of the provision of a monthly credit statement or payment due date). Qwest shall retain sufficient records to demonstrate fully the basis for its calculations for long enough to meet this potential recalculation obligation. CLEC verification or recalculation efforts should be made reasonably contemporaneously with Qwest measurements. In any event, Qwest shall maintain the records in a readily useable format for one year. For the remaining two years, the records may be retained in archived format. Any payment adjustments shall be subject to the interest rate provisions of section 11.1.

15.0 Integrated Audit Program/Investigations of Performance Results

15.1 Audits of the PAP shall be conducted in a two-year cycle under the auspices of the Commission in accordance with a detailed audit plan developed by an independent auditor retained for a two-year period. The Commission shall select the independent auditor with input from Qwest and CLECs.

15.1.1 [This section intentionally left blank.]

15.1.2 The initial audit plan shall be conducted over two years, with audit periods subsequent to the initial audit to be determined by the Commission. The Commission will determine the scope of and procedure for the audit plan, which, at a minimum, will identify the specific performance measurements to be audited, the specific tests to be conducted, and the entity to conduct them. The initial audit plan will give priority to auditing the higher risk areas identified in the OSS report. The two-year cycle will examine risks likely to exist across that period and the past history of testing, in order to determine what combination of high and more moderate areas of risk should be examined during the two-year cycle. The first year of a two-year cycle will concentrate on areas most likely to require follow-up in the second year.

15.1.3 The Commission will attempt to coordinate its audit plan with other audit plans that may be conducted by other state commissions so as to avoid duplication. The audit shall be conducted so as not to impede Qwest's ability to comply with the other provisions of the PAP and should be of a nature and scope that it can be conducted with the reasonable course of Qwest's business operations.

15.1.4 Any dispute arising out of the audit plan, the conduct of the audit, or audit results shall be resolved by the Commission

15.2 Qwest shall carefully document any and all changes that Qwest makes to the Performance Measurement and Reporting System. This change log shall be displayed on a public website dedicated to the QPAP. The Performance Measurement and Reporting System is defined to include at least: elements of Qwest's Regulatory Reporting System that constitute the data collection programs (i.e., the software code used by Qwest to determine which data fields are used and how they are used), the underlying data extracted by the data collection programs and data reference tables (e.g., USOC tables, wire center tables, etc., used

in the calculation of measurements), the data staging programs (programming code used to organize and consolidate the data), the calculation programming (the code used to implement the formula defined for a measurement), and the report generation programs (including the report format and report file creation). This change log shall contain, at a minimum, a detailed description of the change (in plain English); the effects of the change, the reason for the change, the dates of notification and of implementation, and whether the change received Commission approval. Qwest shall also record if the change is fundamental or non-fundamental (see Sections 15.2.1 and 15.2.2).

15.2.1 Qwest shall be allowed to change the Performance Measurement and Reporting System as defined in Section 15.2 in ways that are non-fundamental (i.e. system changes for which the relevant performance data can be replicated under the old approach) without preapproval, but shall promptly record these changes on the change log. Omitted or inaccurate changes to the change log shall result in Qwest being required to pay a $250 fine, plus interest at the prime rate as reported in the Wall Street Journal accrued from the time the change took effect. The payment shall go to the Tier 2 ND Performance Assurance Fund and does not count against the annual cap described in QPAP Section 12.

15.2.2 Before making any changes to the Performance Measurement and Reporting System in a manner whereby the relevant data cannot be reconstructed under the prior approach (i.e., a fundamental change to its measurement system), Qwest shall record the proposed change to the change log and notify the Commission staff and the Auditor retained for the purpose of auditing performance measurements under this QPAP to request an evaluation of the proposed change. The Commission staff or the Auditor will evaluate the impact of the proposed change and report, in writing, the results of that evaluation to the Commission and Qwest. Qwest shall immediately post this report on the public QPAP website. Upon receiving the report of the impact evaluation from the Commission staff or the Auditor, the Commission shall have 15 days to take action to prevent Qwest from making such a change and to decide on a process for resolving the issue. During the first seven-day period following the filing and recording of the Commission staff or Auditor's report, interested parties may file comments on the proposed change and the report. If the Commission takes no action on the issue during the 15-day period, Qwest shall be free to make the proposed change.

15.2.3 If Qwest makes a fundamental change pursuant to Section 15.2.2 without obtaining approval, it shall be liable for $10,000 payable to the ND Performance Assurance Fund. If Qwest cannot reproduce reliable performance data, the Commission shall determine what payments are due based upon the data collected by the affected CLECs plus interest at the prime rate as reported in the Wall Street Journal accrued from the time the change took effect.

15.3 In the event of a disagreement between Qwest and CLEC as to any issue regarding the accuracy or integrity of data collected, generated, and reported pursuant to the PAP, Qwest and the CLEC shall first consult with one another and attempt in good faith to resolve the issue. If an issue is not resolved within 45 days after a request for consultation, CLEC and Qwest may, upon a demonstration of good cause, (e.g., evidence of material errors or discrepancies) request an independent audit to be conducted, at the initiating party's expense. The independent auditor will assess the need for an audit based upon whether there exists a

material deficiency in the data or whether there exists an issue not otherwise addressed by the audit plan for the current cycle. The Commission will resolve any dispute by any party questioning the independent auditor's decision to conduct or not conduct a CLEC request audit and the audit findings, should such an audit be conducted. An audit may not proceed until dispute resolution is completed. Audit findings will include: (a) general applicability of findings and conclusions (i.e., relevance to CLECs or jurisdictions other than the ones causing test initiation), (b) magnitude of any payment adjustments required and, (c) whether cost responsibility should be shifted based upon the materiality and clarity of any Qwest non-conformance with measurement requirements (no pre-determined variance is appropriate, but should be based on the auditor's professional judgment). CLEC may not request an audit of data more than three years from the later of the provision of a monthly credit statement or payment due date.

15.4 Expenses for the audit of the PAP and any other related expenses, except that which may be assigned under section 15.3, shall be paid first from the Tier 2 funds. If Tier 2 funds are not sufficient to cover audit costs, the Commission will develop an additional funding method which may include contributions from CLEC's Tier 1 payment.

15.5 Qwest will investigate any second consecutive Tier 2 miss to determine the cause of the miss and to identify the action needed in order to meet the standard set forth in the performance measurements. To the extent an investigation determines that a CLEC was responsible in whole or in part for the Tier 2 misses, Qwest shall receive credit against future Tier 2 payments in an amount equal to the Tier 2 payments that should not have been made. The relevant portion of subsequent Tier 2 payments will not be owed until any responsible CLEC problems are corrected. For the purposes of this sub-section, Tier 1 performance measurements that have not been designated as Tier 2 will be aggregated and the aggregate results will be investigated pursuant to the terms of this Agreement.

16.0 Reviews

16.1 Every six (6) months, beginning six months after the effective date of the first Section 271 approval by the FCC of one of the states that participated in the multi-state QPAP review proceeding, Qwest, CLECs, and the Commission shall review the performance measurements in the QPAP to determine whether measurements should be added, deleted, or modified; whether the applicable benchmark standards should be modified or replaced by parity standards; and whether to move a classification of a measurement to High, Medium, or Low or Tier 1 to Tier 2. The criterion for reclassification of a measurement shall be whether the actual volume of data points was less or greater than anticipated. Criteria for review of performance measurements, other than for possible reclassification, shall be whether there exists an omission or failure to capture intended performance, and whether there is duplication of another measurement. Any disputes regarding adding, deleting, or modifying performance measurements shall be resolved by the Commission. The NDPSC retains the right to add topics and criteria to the six-month review, retains the ability to order changes if the QPAP is not in the public interest, and retains the ability to hear any disputes regarding the six-month review. The Commission may conduct joint reviews with other states. Any

changes at the six-month review pursuant to this section shall apply to and modify this agreement between Qwest and CLEC.

16.1.1 To limit the potential for increased liability due to changes in the PAP, Qwest shall be allowed to limit its liability for changes made pursuant to the six-month review. Accordingly, Qwest shall calculate, separately, payments owed under the PAP that do not include changes made at the six month review (baseline PAP), as well as payments owed under a PAP revised to reflect changes made at the six month review (revised PAP). If payments calculated under the revised PAP are more than 110% of payments calculated under the baseline PAP, Qwest shall limit payments for the changed measurements to the affected LECs and to the Special Fund to a 10% increase (10% collar) above the total baseline PAP payment liability. At any six-month review, if the total payment liability for the revised PAP is below 110% of the total payment liability for the baseline PAP for the preceding six-month period, the revised PAP shall become the baseline PAP for the next six-month period, otherwise, the same baseline PAP shall remain in effect for the next six month period.

16.2 Two years after the effective date of the first Section 271 approval by the FCC of one of the states that participated in the multi-state QPAP review proceeding, the Commission may conduct a review by an independent third party to examine the continuing effectiveness of the PAP as a means of inducing compliant performance. This review shall not be used to open the PAP generally to amendment, but would serve to assist the Commission in determining existing conditions and reporting to the FCC on the continuing adequacy of the PAP to serve its intended functions. The Commission may conduct a joint review with other states.

16.3 Notwithstanding section 16.1, if any agreements on adding, modifying or deleting performance measurements as permitted by section 16.1 are reached between Qwest and CLECs participating in an industry Regional Oversight Committee (ROC) PID administration forum, those agreements shall be incorporated into the QPAP and modify the agreement between CLEC and Qwest at any time those agreements are submitted to and approved by the Commission, whether before or after a six-month review. Any changes made pursuant to this section shall be subject to and included in the calculation and application of the 110% payment collar identified in section 16.1.

16.4 Qwest will make the PAP available for CLEC interconnection agreements until such time as Qwest eliminates its Section 272 affiliate. At that time, the Commission and Qwest shall review the appropriateness of the PAP and whether its continuation is necessary. However, in the event Qwest exits the interLATA market, that State PAP shall be rescinded immediately.

17.0 Voluntary Performance Assurance Plan

This PAP represents Qwest's voluntary offer to provide performance assurance. Nothing in the PAP or in any conclusion of non-conformance of Qwest's service performance with the

standards defined in the PAP shall be construed to be, of itself, non-conformance with the Act.

18.0 Dispute Resolution

For the purpose of resolving disputes over the meaning of the provisions of the PAP and how they should be applied, the dispute resolution provisions of the SGAT, section 5.18, shall apply whether the CLEC uses the SGAT in its entirety or elects to make the PAP part of its interconnection agreements (i.e., the unique dispute resolution provisions of interconnection agreements should not apply).

Attachment 1: Tier 1 and Tier 2 Performance Measurements Subject to Per Occurrence Payment

Performance Measurement		Tier 1 Payments			Tier 2 Payments		
		Low	Med	High	Low	Med	High
GATEWAY							
Timely Outage Resolution	GA-7						X
PRE-ORDER/ORDERS							
LSR Rejection Notice Interval	PO-5	X					
Firm Order Confirmations On Time	PO-5	X					
Work Completion Notification Timeliness	PO-6	X				X	
Billing Completion Notification Timeliness	PO-7	X					
Jeopardy Notice Interval	PO-8	X					
Timely Jeopardy Notices	PO-9	X					
Release Notifications	PO-16						X
ORDERING AND PROVISIONING							
Installation Commitments Met	OP-5			X		X	
Installation Intervals	OP-6			X		X	
New Service Installation Quality	OP-7			X		X	
Delayed Days	OP-8			X		X	
Number Portability Timeliness	OP-9			X		X	
Coordinated Cuts On Time – Unbundled Loops	OP-13			X		X	
LNP Disconnect Timeliness	OP-17			X		X	
MAINTENANCE AND REPAIR							
Out of Service Cleared within 24 hours	MR-3			X			
All Troubles Cleared within 4 hours	MR-5			X			
Mean time to Restore	MR-6			X			
Repair Repeat Report Rate	MR-7			X		X	
Trouble Rate	MR-8			X		X	
LNP Trouble Reports Cleared within 24 Hours	MR-11			X		X	
LNP Trouble Reports – Mean Time to Restore	MR-12			X		X	
BILLING							
Time to Provide Recorded Usage Records	BI-1	X					X
Billing Accuracy-Adjustments for Errors	BI-3	X					
Billing Completeness	BI-4	X				X	
NETWORK PERFORMANCE							
Trunk Blocking	NI-1			X			X
NXX Code Activations	NP-1			X			X

a. PO-3 is limited to PO-3a-1, PO-3b-1, and PO-3c.

b. PO-6 is included with PO-7 as two "families:" PO-6a/PO-7a and PO-6b/PO-7b. Measurements within each family share a single payment opportunity with only the measurements with the highest payment being paid.

c.. OP-4 is included with OP-6 as five "families:" OP-4a/OP-6-1, OP-4b/OP-6-2, OP-4c/OP-6-3, OP-4d/OP-6-4, and OP-4e/OP-6-5. Measurements within each family share a single payment opportunity with only the measurement with the highest payment being paid.

d. For purposes of the PAP, OP-6a and OP-6b will be combined and treated as one. The combined OP-6 breaks down to OP-6-1 (within MSA), OP-6-2 (outside MSA), OP-6-3 (no dispatch), OP-6-4 (zone 1), and OP-6-5 (zone 2).

Attachment 2: Performance Measurements Subject to Per Measurement Caps

Billing

Time to Provide Recorded Usage Records – BI-1 (Tier 1/Tier 2)
Billing Accuracy – Adjustments for Errors – BI-3 (Tier 1)
Billing Completeness – BI-4 (Tier 1/Tier 2)

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
JUL 17 02
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE ANALYSIS OF QWEST CORPORATION'S COMPLIANCE WITH SECTION 271 (C) OF THE TELECOMMUNICATIONS ACT OF 1996	))))	**DOCKET TC 01-165** **CERTIFICATE OF SERVICE**

I, John L. Munn, do hereby certify that I am counsel for Qwest Corporation , and on this 16th day of July, 2002, true and corrected copies of the following briefs:

- **Qwest Corporation's Overview Reply Brief**
- **Qwest Corporation's Post-Hearing Reply Brief on Compliance With The 14-Point Competitive Checklist**
- **Qwest Corporation's Reply Brief in Support Of The QPAP**
- **Qwest Corporation's Post-Hearing Reply Brief On General Terms and Conditions, Section 272, and Track A**
- **Qwest Corporation's Post-Hearing Reply Brief On The Public Interest**
- **Qwest Corporation's Post-Hearing Reply Brief On Change Management.**

and the following Exhibits:

- Qwest Exhibit 92 (a matrix responding to Staff issues)
- Qwest Exhibit 93 (the North Dakota QPAP)

were filed with the South Dakota Public Utilities Commission and were sent to the following intervenors:

Steven H. Weigler
AT&T Communications of the Midwest
1875 Lawrence Street
Denver, CO
Email: weigler@lga.att.com

via E-Mail and Overnight Delivery

Black Hills Fiber Com
Gregory J. Bernard
Morrill, Thomas, Nooney & Braun
PO Box 8108
Rapid City, SD 57709
Email: Gjbernard@mtnlaw.com

via E-Mail and Overnight Delivery

Midcontinent Communications
David A. Gerdes
May, Adam, Gerdes & Thompson LLP
503 S. Pierre St.
Pierre, SD 57501-0160
Email: dag@magt.com

via E-Mail and Overnight Delivery

Harlan Best, Staff Analyst
Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

via E-Mail and Overnight Delivery

Karen Cremer, Staff Attorney
Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501
Email: Karen.cremer@state.sd.us

via E-Mail and Overnight Delivery

Attorney for Qwest Corporation

LAW OFFICES
MORRILL THOMAS NOONEY & BRAUN, LLP
625 NINTH STREET - 8TH FLOOR
P.O. BOX 8108
RAPID CITY, SOUTH DAKOTA 57709-8108
TELEPHONE (605) 348-7516
FAX (605) 348-5862
www.lawyers.com/mtnblaw

TIMOTHY L. THOMAS*
JOHN K. NOONEY*
LONNIE R. BRAUN†
KURT E. SOLAY
GREGORY J. BERNARD
*ALSO LICENSED IN WYOMING
†ALSO LICENSED IN NEBRASKA

OF COUNSEL
DAVID E. MORRILL

[e-mail: gjbernard@mtnlaw.com]

July 19, 2002

RECEIVED
JUL 22 2002
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Ms. Debra Elofson
Executive Director
Public Utilities Commission
State Capitol Building
500 East Capitol Avenue
Pierre, SD 57501

RE: Black Hills FiberCom/US West 271 Application
TC01-165
Our File No. BH-1231

Dear Ms. Elofson:

Please find enclosed for filing the original and ten (10) copies of a Motion for Withdrawal of Counsel with regard to the above-referenced matter.

Please call if you have any questions.

Sincerely,

Gregory J. Bernard

GJB:so
Enclosures

cc: Clients
Service List

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF SOUTH DAKOTA

RECEIVED
JUL 22 2002
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE ANALYSIS INTO QWEST CORPORATION'S COMPLIANCE WITH SECTION 271(c) OF THE TELECOMMUNICATIONS ACT OF 1996	DOCKET NO. TC01-165 MOTION FOR WITHDRAWAL OF COUNSEL

The undersigned counsel, Gregory J. Bernard, of Morrill, Thomas, Nooney & Braun, LLP, who has appeared in the above-entitled matter attorney for Black Hills FiberCom, L.L.C. hereby moves this Court for leave to withdraw as attorney of record for FiberCom, based upon the fact that the law firm of Morrill, Thomas, Nooney & Braun, LLP, is currently involved in litigation against FiberCom's parent corporation, Black Hills Corporation.

Movant further requests that the Commission direct that all pleadings, correspondence, or other materials or contacts related to this matter be hereafter served upon attorney Linden Evans, who has appeared in this matter, as attorney for FiberCom.

Dated this 19 day of July, 2002.

Gregory J. Bernard
Attorneys for Black Hills FiberCom L.L.C.
MORRILL THOMAS NOONEY & BRAUN, LLP
625 9th Street, 8th Floor/PO Box 8168
Rapid City, SD 57709-8108
(605) 348-7516

CERTIFICATE OF SERVICE

I, Gregory J. Bernard, attorney for Black Hills FiberCom, L.L.C. in the above-entitled matter, do hereby certify that a true and correct copy of Black Hills Fibercom, L.L.C.'s Motion

for Withdrawal of Counsel was mailed by first-class mail, postage prepaid thereon, to the following:

Ms. Colleen Sevold
Qwest Corporation
125 South Dakota Avenue, 8th Floor
Sioux Falls, SD 57194

Mr. Harlan Best
Staff Analyst
Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

David A. Gerdes, Esq.
May Adam Gerdes & Thompson
PO Box 160
Pierre, SD 57501-0160

Ms. Mary S. Hobson
Stoel Rives LLP
101 South Capitol Blvd, Suite 1900
Boise ID 83702-5958

Mr. Ted Smith
Qwest Corporation
One Utah Center, Suite 1100
201 South Main Street
Salt Lake City UT 84111

Mr. Warren R. Fischer
Senior Consultant
QSI Consulting
3333 East Bayaud Avenue, Suite 820
Denver CO 80209-2945

Mr. Mark Stacy
QSI Consulting
5300 Meadowbrook Drive
Cheyenne WY 82009

Mr. John L. Munn
Qwest Corporation
1801 California Street, Suite 4900
Denver CO 80202

Marlon "Buster" Griffing Ph.D.
Senior Consultant
QSI Consulting
1735 Crestline Drive
Lincoln NE 68506

Thomas J. Welk, Esq.
Boyce, Murphy, McDowell & Greenfield
PO Box 5015
Sioux Falls, SD 57117-5015

Karen Cremer, Esq.
Staff Attorney
Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

Mr. Steve H. Weigler
Ms. Mary B. Tribby
AT&T Communications of the Midwest
1875 Lawrence Street, Suite 1524
Denver, CO 80202

by depositing the same in the United States Mail at Rapid City, South Dakota, this 12 day of July, 2002.

Gregory J. Bernard

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
JUL 2 7 2002
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE REQUEST IN JULY OF 2002 FROM THE PUBLIC UTILITIES COMMISSION FOR THREE WAY CALLING INFORMATION

REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION

Pursuant to ARSD 20:10:01:41, Qwest Corporation ("Qwest "), through the undersigned counsel, requests confidential treatment for the following information requested orally on or about the 1st day of July, 2002 by the Executive Director of the Public Utilities Commission, Debra Elofson to Colleen Sevold, as to three way calling information of Qwest in SD.

1. The information described in the attached Exhibit 1 dated July 17, 2002 is marked as confidential and is provided in a sealed envelope filed separately from this request.

2. The exhibit must not be disclosed.

3. The person to be notified is Colleen Sevold, Qwest Corporation, 125 South Dakota Avenue, 8th Floor, Sioux Falls, SD 57194, telephone (605) 335-4596.

4. The claim for protection is based on ARSD 20:10:01:39 (4) and (6) and SDCL 37-29-1(4).

5. The exhibit contains proprietary business information. Disclosure of this information will provide actual and potential competitors with information which could provide them with a unique and unfair competitive advantage. Accordingly, Qwest respectfully requests that the Commission grant this request for confidential protection.

DATED this 19th day of July, 2002.

Thomas J. Welk
Boyce, Murphy, McDowell & Greenfield, L.L.P.
101 North Phillips Avenue, Suite 600
Sioux Falls, SD 57104
Attorneys for Qwest Corporation

CONTINUATION

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ride the light

Qwest

Performance Results

Regional

July 2001 - June 2002

July 16, 2002

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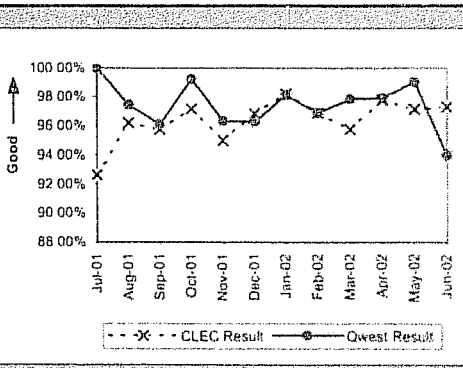
Checklist #1 - Local Interconnection - LIS Installation

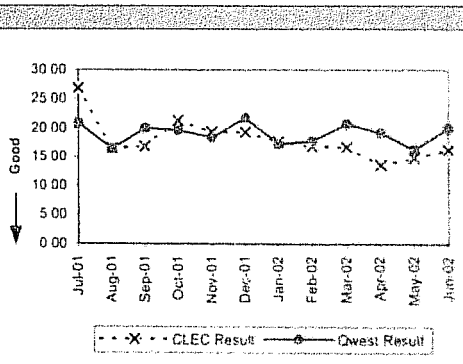
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	150	150	92 67%	26 07%	303	303	100 00%	N/A	1 47
	125	132	96 21%	19 00%	231	237	97 47%	0 66	-0 6
	155	165	95 76%	20 10%	197	205	96 10%	0 15	-0 91
	247	253	97 16%	16 56%	263	265	99 25%	1 69	0 03
	192	206	95 60%	21 79%	236	245	96 33%	0 67	-0 59
	183	191	96 86%	17 44%	233	242	96 28%	-0 32	-1 19
	227	230	99 23%	13 19%	105	107	98 13%	-0 06	-1 04
	286	295	96 95%	17 34%	125	129	96 90%	-0 08	-1 05
	203	213	95 77%	28 12%	91	93	97 85%	0 85	-0 49
	228	233	97 79%	14 60%	94	96	97 92%	-0 04	-1 02
	271	281	97 15%	16 03%	106	107	99 07%	1 09	-0 34
	108	112	97 32%	16 15%	110	117	94 02%	-1 05	-1 64



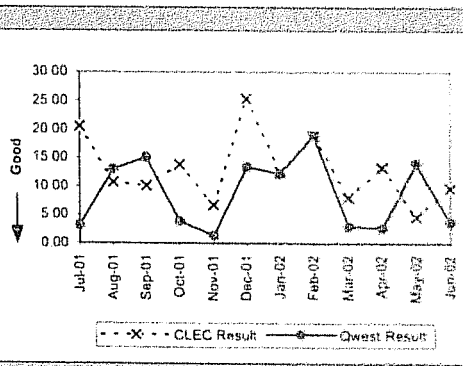
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	8448	373	25 86	18 05	8519	405	21 03	6 01	2 65
	5208	195	16 65	16 38	5378	327	16 45	0 09	-0 94
	8448	245	16 60	9 46	8416	420	20 04	-3 45	-3 1
	8283	369	21 37	15 71	7923	403	19 66	1 93	0 17
	6993	267	19 43	11 68	6910	374	18 48	1 1	-0 33
	6594	273	19 34	15 37	6587	303	21 74	-2 6	-2 58
	6555	311	17 73	9 76	2333	135	17 28	0 65	-0 6
	6082	358	18 91	9 05	2813	158	17 80	-1 12	-1 68
	5432	315	16 83	9 66	2332	112	20 82	-3 62	-3 2
	6566	334	13 68	6 39	2259	117	19 31	-8 04	-5 89
	6662	332	14 83	7 19	2106	129	16 33	-2 12	-2 29
	1137	131	16 36	7 43	2660	133	20 00	-5 02	-4 05



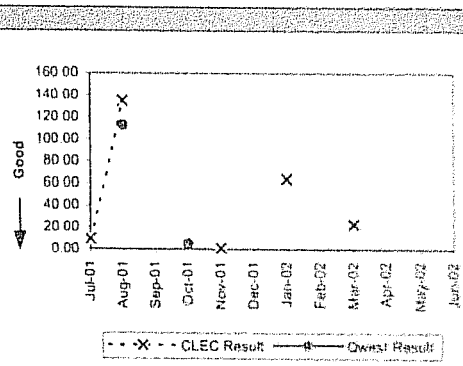
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	165	8	20 58	20 14	25	8	3 12	2 75	0 67
	354	22	16 73	24 68	286	22	13 00	-0 67	-1 41
	427	42	10 17	12 31	393	26	15 12	-1 05	-1 64
	682	73	13 84	15 17	50	13	3 85	1 22	-0 26
	638	96	6 77	12 50	183	138	1 33	2 88	0 75
	618	24	25 42	26 00	242	18	13 44	1 76	0 07
	870	33	12 61	12 05	73	6	12 17	-0 2	-1 12
	568	16	18 94	16 72	114	6	19 00	-0 01	-1
	199	22	8 05	8 39	9	3	3 00	1 25	-0 24
	180	9	13 33	15 15	8	3	2 67	1 19	-0 28
	32	8	4 62	4 27	28	2	14 00	-0 65	-1 39
	39	4	9 75	6 70	30	8	3 75	1 32	-0 2



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

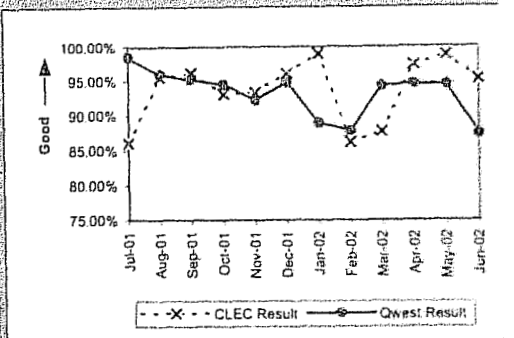
	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	28	3	9 33	2 08					
	135	1	135 00		113	1	113 00		
					5	1	5 00		
	1	1	1 00						
	84	1	84 00						
	33	1	33 00						



Checklist #1 - Local Interconnection - LIS Installation

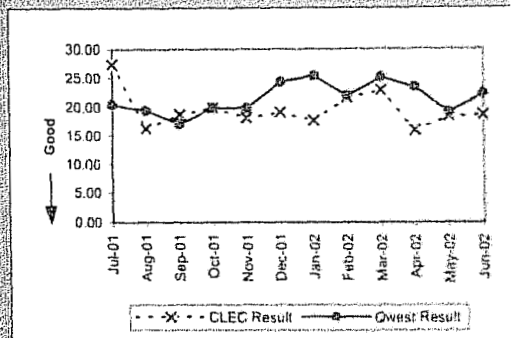
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	91	96	96.11%	34.58%	271	275	98.55%	3.16	0.92
	43	45	95.56%	20.61%	264	275	96.00%	0.18	-0.89
	54	56	96.30%	18.89%	140	147	95.24%	-0.31	-1.19
	73	78	93.15%	25.26%	223	236	94.49%	0.44	-0.73
	80	86	93.03%	24.94%	214	232	92.24%	-0.28	-1.17
	75	78	96.15%	19.23%	164	173	94.80%	-0.45	-1.27
	100	101	99.01%	9.90%	105	118	88.98%	-2.36	-2.44
	56	58	96.21%	34.48%	86	98	87.76%	0.27	-0.83
	62	67	97.73%	32.82%	83	88	94.32%	1.35	-0.18
	113	117	97.37%	16.01%	87	92	94.57%	-0.88	-1.54
	93	96	96.88%	18.60%	120	127	94.49%	-1.38	-1.84
	82	83	98.24%	21.30%	111	127	87.40%	-1.53	-1.93



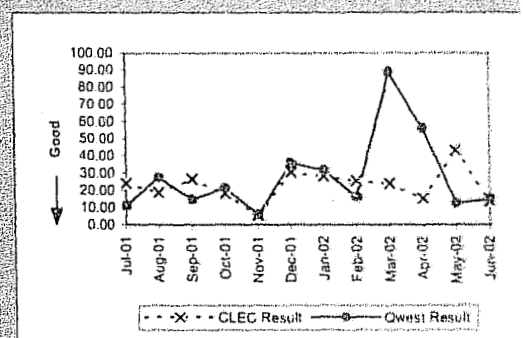
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	1899	99	27.15	21.48	8199	400	20.50	0.98	-0.4
	1118	68	16.32	13.86	8268	426	19.39	-1.31	-1.8
	1396	85	18.78	20.16	4207	246	17.10	0.62	-0.62
	2541	128	19.85	13.79	6252	315	19.85	0	-1
	1357	91	16.14	12.01	6946	350	19.85	-1	-1.61
	2211	111	19.16	13.32	5947	244	24.37	-1.33	-1.81
	2438	139	17.66	14.26	4689	185	25.35	-3.14	-2.91
	1783	91	21.64	19.61	2900	132	21.97	-0.17	-1.11
	2315	131	22.92	15.71	3280	131	25.08	-0.32	-1.2
	2787	135	15.56	6.24	3542	151	23.46	-2.07	-2.26
	1841	104	18.43	12.65	3244	170	19.08	-0.76	-1.46
	1741	93	18.61	8.60	3867	174	22.22	-3.42	-3.08



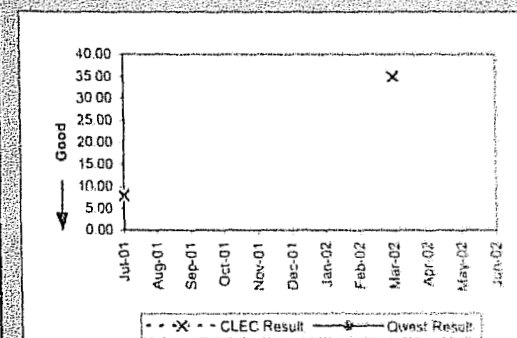
Installation Time for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	484	20	24.20	24.21	267	24	11.12	1.34	-0.18
	180	10	18.00	29.22	994	36	27.61	-0.51	-1.31
	341	13	26.54	31.64	369	25	14.76	1.17	-0.29
	415	23	18.04	16.72	687	32	21.47	-0.46	-1.28
	184	35	5.26	13.67	800	136	5.88	-0.18	-1.11
	274	9	30.44	31.33	897	25	35.88	-0.14	-1.09
	609	19	28.25	37.85	698	22	31.73	-0.21	-1.13
	464	16	25.76	22.87	321	20	16.05	1.11	-0.32
	355	15	23.87	24.45	712	8	89.00	-0.75	-1.46
	81	6	13.25	16.11	506	9	56.22	-0.58	-1.35
	181	4	43.25	27.29	111	9	12.33	2.14	0.3
	81	4	13.75	16.17	401	27	14.85	-0.18	-1.11



Installation Time for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	8	1	8.00						
	35	1	35.00						



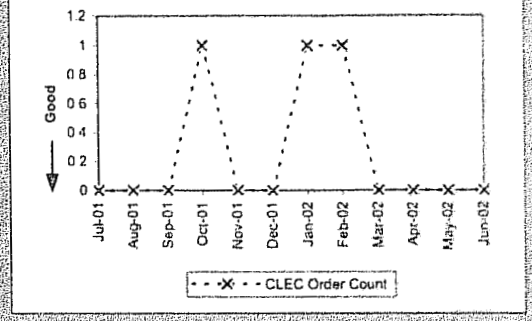
Checklist #1 - Local Interconnection - LIS Installation

Percent Provisioning Troubles within 30 Days (OP-5) (Parity) – Interval Zone One and Two

Checklist #1 - Local Interconnection - LIS Installation

Percent Facilities Orders Delayed for Facilities Reasons LIS Trunk (OP-15B) (Diagnostic)

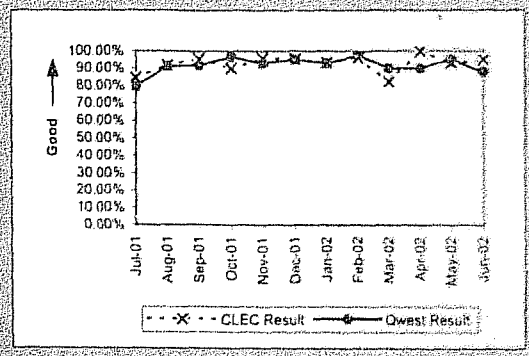
	CLEC Order Count
	0
	0
	0
	1
	0
	0
	1
	1
	0
	0
	0
	0



Checklist #1 - Local Interconnection - LIS Repair

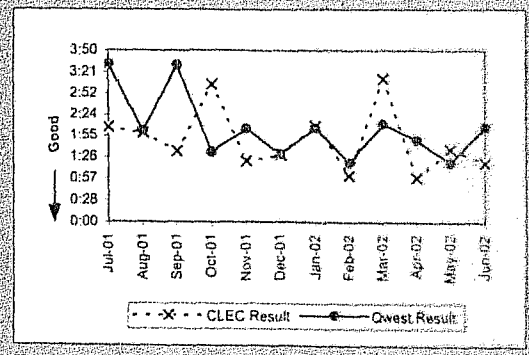
All Trouble Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
		158	84.81%	35.89%	63	79	79.75%	-0.91	-1.56
		124	91.94%	27.23%	72	79	91.14%	-0.19	-1.12
		119	95.76%	20.14%	57	62	91.94%	-0.9	-1.54
		135	90.20%	29.74%	58	60	96.67%	1.52	-0.08
		87	96.10%	19.35%	53	57	92.98%	-0.7	-1.43
		88	95.59%	20.54%	40	42	95.24%	-0.08	-1.05
		101	93.35%	24.85%	39	42	92.86%	-0.12	-1.07
		185	96.36%	18.72%	42	43	97.67%	0.28	-0.83
		74	82.43%	38.05%	54	60	90.00%	1.23	-0.25
		63	100.00%	0.00%	63	70	90.00%	-2.05	-2.25
		99	93.26%	25.07%	60	63	95.24%	0.45	-0.72
		50	96.00%	21.79%	50	57	87.72%	-1.2	-1.73



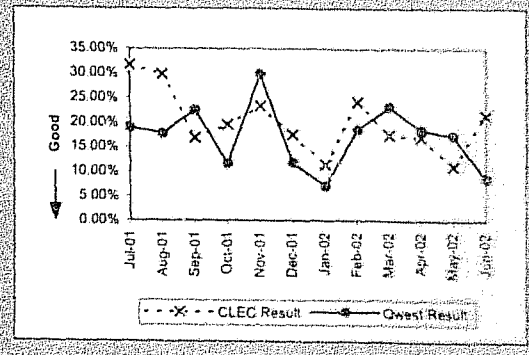
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
		156	2:07	3:25	279:02	79	3:32	-1.08	-1.66
		124	1:55	4:30	161:04	79	2:02	-0.18	-1.11
		114	1:34	2:47	218:08	62	3:31	-0.8	-1.49
		62	3:05	8:14	93:22	60	1:33	2.88	0.75
		97	1:21	2:05	117:44	57	2:04	-0.71	-1.43
		66	1:29	2:52	62:43	42	1:30	-0.02	-1.01
		121	2:09	6:19	87:54	42	2:06	-0.15	-1.09
		102	1:02	1:14	56:41	43	1:19	-1.3	-1.79
		74	3:13	7:00	130:44	60	2:11	1.09	-0.34
		62	0:58	0:51	126:43	70	1:49	-2.13	-2.29
		66	1:37	2:26	83:28	63	1:19	0.89	-0.46
		60	1:19	1:13	120:14	57	2:07	-0.71	-1.43



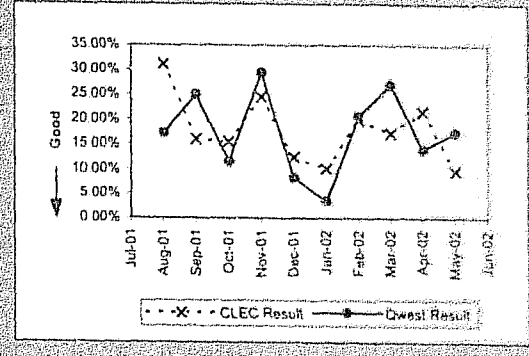
Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
		158	31.65%	46.51%	15	79	18.99%	2.03	0.24
		124	29.84%	45.76%	14	79	17.72%	1.95	0.18
		119	16.95%	37.52%	14	62	22.58%	-0.86	-1.52
		135	39.41%	39.70%	7	60	11.67%	1.3	-0.21
		87	23.38%	42.32%	17	57	29.82%	-0.81	-1.49
		88	17.05%	38.12%	5	42	11.90%	0.78	-0.53
		101	11.47%	31.99%	3	42	7.14%	0.77	-0.53
		185	23.24%	42.86%	8	43	18.60%	0.76	-0.54
		74	12.57%	38.05%	14	60	23.33%	-0.78	-1.48
		63	12.07%	37.63%	13	70	18.57%	-0.24	-1.14
		99	11.24%	31.58%	11	63	17.46%	-1	-1.61
		50	21.67%	41.20%	5	57	8.77%	1.92	0.17



Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

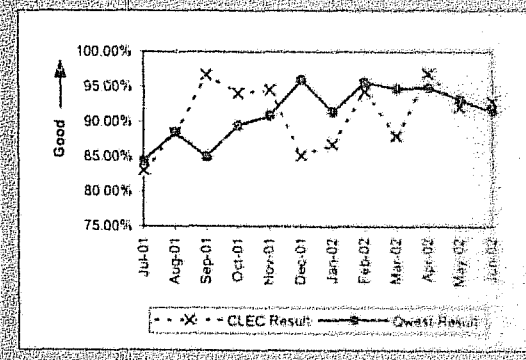
			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
		93	31.18%	46.32%	10	58	17.24%	1.91	0.16
		82	16.05%	36.71%	12	48	25.00%	-1.13	-1.69
		77	16.56%	36.27%	5	43	11.63%	0.56	-0.66
		53	24.53%	43.03%	10	34	29.41%	-0.49	-1.3
		48	12.50%	33.07%	2	24	8.33%	0.37	-0.78
		95	10.26%	30.27%	1	29	3.45%	1.1	-0.33
		135	20.00%	40.00%	6	29	20.69%	-0.08	-1.05
		46	17.39%	37.90%	10	37	27.03%	-0.98	-1.6
		51	31.37%	41.13%	7	50	14.00%	0.96	-0.42
		62	9.68%	29.57%	7	40	17.50%	-1.02	-1.62



Checklist #1 - Local Interconnection - LIS Repair

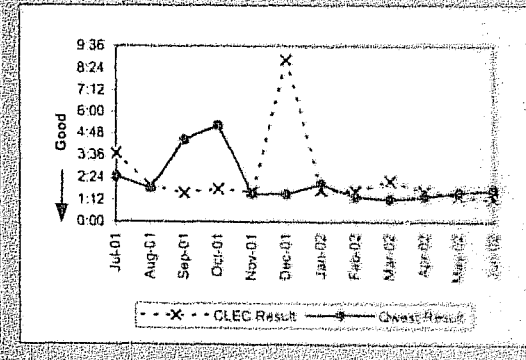
All Troubles Cleared within 4 Hours (Percent) (MR-5B) (Parity)-- Interval Zone Two

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	54	65	83.08%	37.50%	76	90	84.44%	0.22	-0.87
	38	43	88.37%	32.06%	54	61	88.52%	0	-1
	30	31	96.77%	17.67%	34	40	85.00%	-1.38	-1.84
	32	34	94.12%	23.53%	34	38	89.47%	-0.64	-1.39
	35	37	94.59%	22.61%	40	44	90.91%	-0.57	-1.35
	23	27	85.19%	35.52%	24	25	96.00%	1.24	-0.25
	32	38	86.84%	33.80%	32	35	91.43%	0.56	-0.66
	50	53	94.34%	23.11%	22	23	95.65%	0.04	-0.97
	23	25	88.00%	32.50%	36	38	94.74%	0.89	-0.46
	32	33	96.88%	17.40%	37	39	94.87%	-0.38	-1.23
	36	39	92.31%	26.97%	55	59	93.22%	0.18	-0.89
	25	28	92.86%	25.75%	32	35	91.43%	-0.2	-1.12



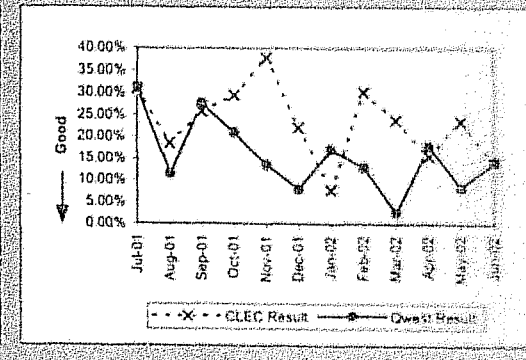
Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	2:43:23	65	3:45	12:15	222:08	90	2:28	1.19	-0.28
	86:31	43	1:59	2:41	112:16	61	1:50	0.45	-0.73
	42:19	31	1:35	1:13	178:22	40	4:28	-0.75	-1.45
	40:58	34	1:46	3:11	199:24	38	5:15	-0.88	-1.53
	84:14	35	1:39	2:47	68:20	44	1:33	0.25	-0.85
	220:48	27	8:51	25:48	37:43	25	1:31	1.44	-0.12
	62:32	38	1:44	1:53	73:05	35	2:05	-0.4	-1.25
	80:21	53	1:41	3:49	31:33	23	1:22	0.09	-0.95
	54:15	25	2:15	3:22	47:28	38	1:15	0.83	-0.49
	52:34	32	1:40	1:36	53:20	39	1:22	0.81	-0.51
	54:50	38	1:26	1:27	95:43	59	1:37	-0.47	-1.29
	29:58	28	1:16	1:20	60:23	35	1:44	-1.15	-1.7



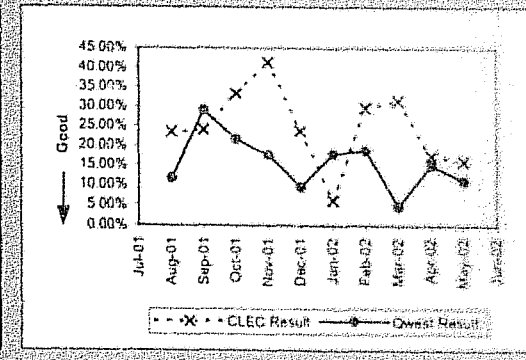
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	25	65	38.77%	46.15%	28	90	31.11%	-0.05	-1.03
	8	43	18.60%	38.91%	7	61	11.48%	0.99	-0.4
	8	31	25.81%	43.76%	11	40	27.50%	-0.16	-1.1
	10	34	29.41%	45.56%	8	38	21.05%	0.79	-0.52
	16	37	37.84%	48.50%	6	44	13.64%	2.47	0.5
	6	27	22.22%	41.57%	2	25	8.00%	1.36	-0.17
	3	38	7.89%	26.97%	6	35	17.14%	-1.05	-1.64
	10	53	30.19%	45.91%	3	23	13.04%	1.58	-0.04
	6	25	24.00%	42.71%	1	38	2.63%	2.44	0.48
	5	32	15.63%	36.31%	7	39	17.95%	-0.25	-1.15
	5	38	23.68%	42.51%	5	59	8.47%	1.99	0.21
	4	28	14.29%	34.99%	5	35	14.29%	0	-1



Repair Repeat Report Rate (Percent) (MR-7E*) (Parity)-- Interval Zone Two

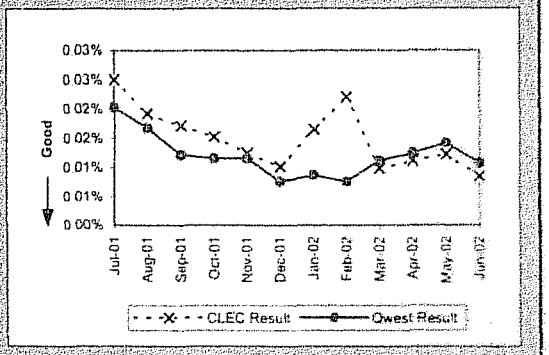
	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	8	34	23.53%	42.42%	5	43	11.63%	1.34	-0.18
	6	25	24.00%	42.71%	9	31	29.03%	-0.41	-1.25
	8	24	33.33%	47.14%	5	23	21.74%	0.84	-0.49
	12	29	41.38%	49.25%	6	34	17.65%	2.03	0.24
	5	21	23.81%	42.59%	2	21	9.52%	1.05	-0.36
	2	32	6.25%	24.21%	5	28	17.86%	-1.17	-1.71
	14	47	29.79%	45.73%	3	16	18.75%	0.81	-0.51
	6	19	31.58%	46.46%	1	21	4.76%	2.08	0.27
	4	23	17.39%	37.90%	3	20	15.00%	0.12	-0.93
	4	25	16.00%	36.66%	5	45	11.11%	0.55	-0.67



Checklist #1 - Local Interconnection - LIS Repair

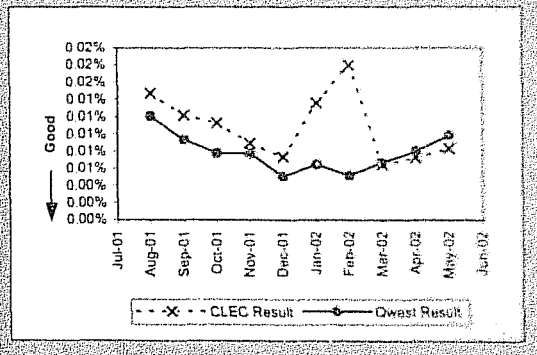
Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

			CLEC Rate	Std Dev	Qwest Num	Qwest Denom	Qwest Rate	Mod Z Scr	Parity Scr
			0.03%	1.58%	169	830632	0.02%	2.18	0.32
			0.02%	1.39%	140	832725	0.02%	1.25	-0.24
			0.02%	1.31%	102	838820	0.01%	2.98	0.81
			0.02%	1.24%	98	846799	0.01%	2.27	0.38
			0.01%	1.12%	101	869808	0.01%	0.54	-0.67
			0.01%	1.01%	67	877674	0.01%	1.96	0.19
			0.02%	1.29%	77	880307	0.01%	5.72	2.48
			0.03%	1.49%	66	863078	0.01%	11.3	5.87
			0.01%	0.99%	98	870344	0.01%	-0.89	-1.54
			0.01%	1.06%	109	868679	0.01%	-0.82	-1.5
			0.01%	1.11%	122	856975	0.01%	-1.11	-1.68
			0.01%	0.92%	92	850639	0.01%	-1.5	-1.91



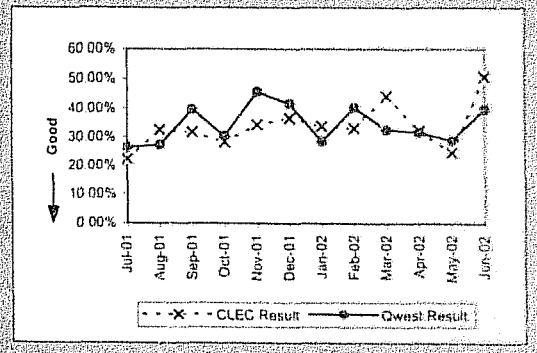
Trouble Rate (Percent) (MR-8.1) (Parity)-- Interval Zone One and Two

			CLEC Rate	Std Dev	Qwest Num	Qwest Denom	Qwest Rate	Mod Z Scr	Parity Scr
			0.01%	1.21%	101	832725	0.01%	1.5	-0.09
			0.01%	1.11%	79	838820	0.01%	1.89	0.15
			0.01%	1.07%	66	846799	0.01%	2.65	0.61
			0.01%	0.95%	68	869808	0.01%	0.88	-0.47
			0.01%	0.86%	45	877674	0.01%	2.12	0.29
			0.01%	1.17%	57	880307	0.01%	6	2.65
			0.02%	1.34%	45	863078	0.01%	12.04	6.32
			0.01%	0.81%	58	870344	0.01%	-0.15	-1.09
			0.01%	0.85%	70	868679	0.01%	-0.6	-1.37
			0.01%	0.92%	85	856975	0.01%	-1.03	-1.62



Percentage and Non-Zero Repeat Trouble Reports (Percent) (MR-10) (Diagnostic)-- Interval Zone One and Two

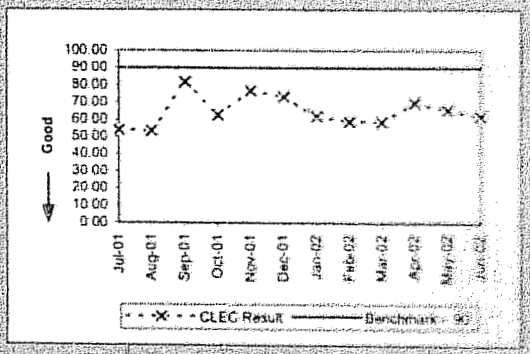
			CLEC Rate	Std Dev	Qwest Num	Qwest Denom	Qwest Rate	Mod Z Scr	Parity Scr
			22.38%	41.63%	61	230	26.52%	-1.08	-1.66
			32.66%	46.90%	53	193	27.46%	1.17	-0.29
			31.96%	46.63%	67	169	39.65%	-1.53	-1.93
			28.42%	45.10%	43	141	30.50%	-0.41	-1.25
			34.48%	47.53%	85	186	45.70%	-2.13	-2.3
			36.67%	48.19%	48	115	41.74%	-0.83	-1.5
			34.02%	47.38%	31	108	28.70%	0.98	-0.41
			33.33%	47.14%	45	111	40.54%	-1.34	-1.81
			44.38%	49.68%	48	146	32.88%	2.11	0.28
			32.54%	46.85%	51	160	31.88%	0.12	-0.93
			24.85%	43.22%	50	172	29.07%	-0.86	-1.52
			50.84%	49.99%	61	153	39.87%	2	0.21



Checklist #1 - Collocation

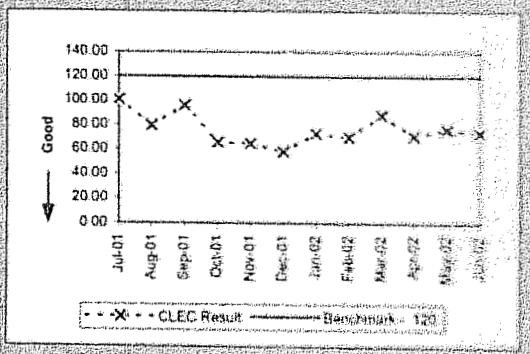
Scheduled Interval 90 Calender Days or Less (Average Days) (CP-1A) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	216	4	54.00	13.44
Aug-01	107	2	53.50	16.26
Sep-01	164	2	82.00	1.41
Oct-01	439	7	62.71	15.98
Nov-01	154	2	77.00	7.07
Dec-01	221	3	73.67	12.06
Jan-02	310	5	62.00	
Feb-02	118	2	59.00	
Mar-02	412	7	58.86	
Apr-02	561	8	70.12	
May-02	855	13	65.77	
Jun-02	623	10	62.30	



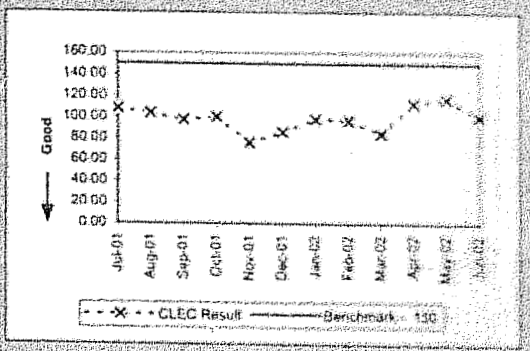
Scheduled Interval 91 to 120 Calendar Days (Average Days) (CP-1B) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	806	8	100.75	11.09
Aug-01	874	11	79.45	16.66
Sep-01	384	4	96.00	17.57
Oct-01	394	6	65.67	24.39
Nov-01	324	5	64.80	16.02
Dec-01	350	6	58.33	4.46
Jan-02	438	6	73.00	
Feb-02	210	3	70.00	
Mar-02	176	2	88.00	
Apr-02	213	3	71.00	
May-02	840	11	76.36	
Jun-02	221	3	73.67	



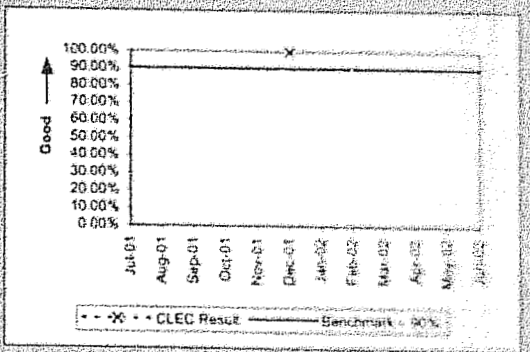
Scheduled Interval 121 to 150 Calendar Days (Average Days) (CP-1C) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	2604	24	108.50	18.44
Aug-01	3228	31	104.13	26.24
Sep-01	783	8	97.88	27.04
Oct-01	805	8	100.62	21.19
Nov-01	838	11	76.18	15.25
Dec-01	1039	12	86.58	24.88
Jan-02	395	4	98.75	
Feb-02	584	6	97.33	
Mar-02	426	5	85.20	
Apr-02	567	5	113.40	
May-02	1414	12	117.83	
Jun-02	1009	10	100.90	



Forcasted Collocations (Percent) (CP-2A) (Benchmark)

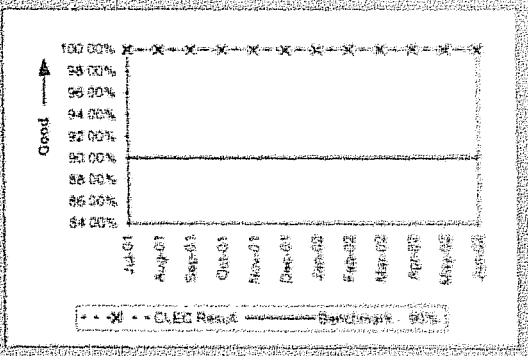
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01				
Dec-01	1	1	100.00%	0.00%
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



Checklist #1 - Collocation

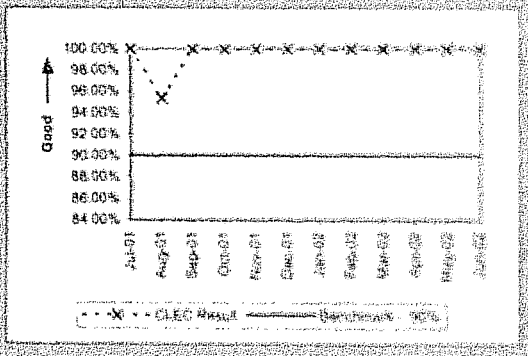
Non-Forcasted & Late Collocations (Percent) (CP-2B) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	12	12	100.00%	0.00%
Aug-01	13	13	100.00%	0.00%
Sep-01	6	6	100.00%	0.00%
Oct-01	13	13	100.00%	0.00%
Nov-01	7	7	100.00%	0.00%
Dec-01	8	8	100.00%	0.00%
Jan-02	11	11	100.00%	
Feb-02	5	5	100.00%	
Mar-02	9	9	100.00%	
Apr-02	11	11	100.00%	
May-02	24	24	100.00%	
Jun-02	13	13	100.00%	



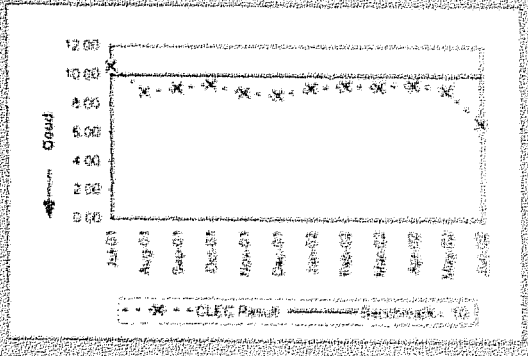
Collocations with Intervals Longer than 120 Days (Percent) (CP-2C) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	39	39	100.00%	0.00%
Aug-01	41	43	95.35%	21.06%
Sep-01	21	21	100.00%	0.00%
Oct-01	23	23	100.00%	0.00%
Nov-01	18	18	100.00%	0.00%
Dec-01	28	28	100.00%	0.00%
Jan-02	27	27	100.00%	
Feb-02	23	23	100.00%	
Mar-02	10	10	100.00%	
Apr-02	15	15	100.00%	
May-02	23	23	100.00%	
Jun-02	22	22	100.00%	



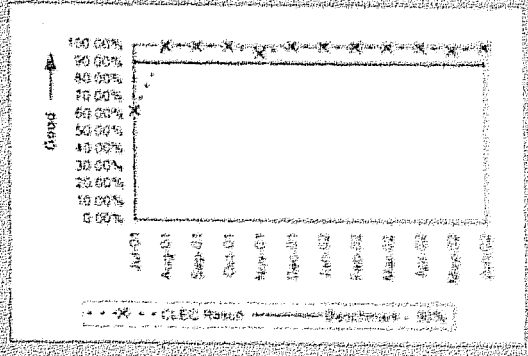
Collocation Feasibility Study Interval (Average Days) (CP-3) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	340	32	10.62	1.86
Aug-01	407	46	8.85	0.87
Sep-01	374	41	9.12	0.95
Oct-01	216	23	9.39	0.78
Nov-01	132	15	8.80	1.26
Dec-01	225	26	8.65	1.50
Jan-02	357	39	9.15	
Feb-02	196	21	9.33	
Mar-02	315	34	9.26	
Apr-02	329	35	9.40	
May-02	316	35	9.03	
Jun-02	182	27	6.74	



Collocation Feasibility Study Commitments Met (Percent) (CP-4) (Benchmark)

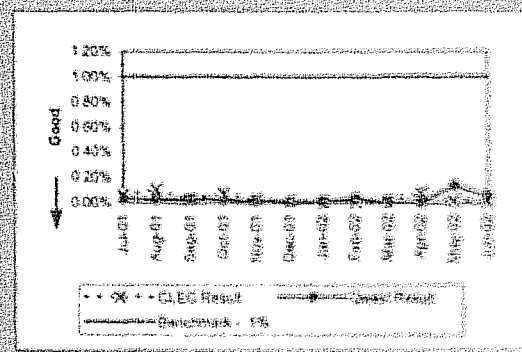
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	25	40	62.50%	48.41%
Aug-01	50	50	100.00%	0.00%
Sep-01	47	47	100.00%	0.00%
Oct-01	36	36	100.00%	0.00%
Nov-01	24	25	96.00%	19.60%
Dec-01	28	28	100.00%	0.00%
Jan-02	49	49	100.00%	
Feb-02	31	31	100.00%	
Mar-02	56	56	100.00%	
Apr-02	42	42	100.00%	
May-02	65	66	98.48%	
Jun-02	33	33	100.00%	



Checklist #1 - Trunk Blocking

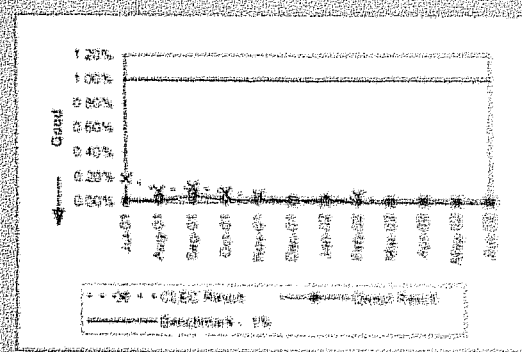
Trunk Blockage to Qwest Tandem Offices (Percent) (NI-1A) (Benchmark)

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	86.52	132714	0.07%	0.58%	82.18	239137	0.03%	25.8	14.69
Aug-01	129.77	122898	0.11%	2.17%	71.46	253345	0.03%	69.72	41.38
Sep-01	33.88	124410	0.03%	0.20%	84.8	256225	0.03%	-4.62	-3.81
Oct-01	94.62	123498	0.08%	1.00%	68.09	258431	0.03%	51.53	30.33
Nov-01	37.16	128514	0.03%	0.24%	37.13	257615	0.01%	32.98	19.05
Dec-01	19.56	134946	0.01%	0.09%	35.04	240799	0.01%	-0.12	-1.67
Jan-02	9.01	128586	0.01%	0.07%	31.99	245265	0.01%	-8.4	-6.1
Feb-02	8.92	134946	0.01%	0.06%	87.09	256302	0.03%	-22.27	-14.54
Mar-02	20.84	142218	0.01%	0.09%	19.56	263670	0.01%	16.46	9.01
Apr-02	121.77	140586	0.09%	0.69%	17.97	258125	0.01%	208.31	125.64
May-02	22.14	153042	0.01%	0.09%	336.85	252233	0.13%	-25.39	-16.44
Jun-02	17.59	157746	0.01%	0.12%	131.88	241617	0.05%	-23.77	-15.45



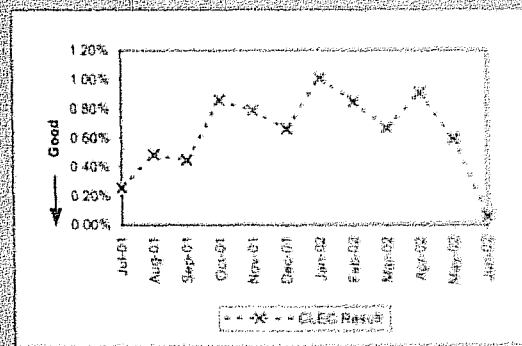
Trunk Blockage to Qwest End Offices (Percent) (NI-1B) (Benchmark)

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	118.35	60418	0.20%	0.81%	43.54	391648	0.01%	254.9	153.97
Aug-01	50.6	55258	0.09%	1.03%	72.27	395546	0.02%	68.5	40.64
Sep-01	82.5	64626	0.13%	1.10%	205.03	395719	0.05%	33.17	19.16
Oct-01	50.07	61498	0.08%	0.49%	105.53	400808	0.03%	34.94	20.24
Nov-01	36	64366	0.06%	0.29%	94.79	400185	0.02%	28.61	16.39
Dec-01	9.44	67282	0.01%	0.13%	99.28	433309	0.02%	-4.17	-3.53
Jan-02	8.01	65890	0.01%	0.09%	125.84	424556	0.03%	-12.63	-8.68
Feb-02	40.87	70089	0.06%	1.03%	44.95	409615	0.01%	104.95	62.81
Mar-02	1.47	75021	0.00%	0.02%	31.25	399757	0.01%	-12.28	-8.46
Apr-02	11.35	73797	0.02%	0.10%	49.54	389773	0.01%	3.44	1.89
May-02	6.88	79126	0.01%	0.22%	26.31	376276	0.01%	3.78	1.3
Jun-02	6.75	79750	0.01%	0.06%	16.06	365148	0.00%	13.45	7.18

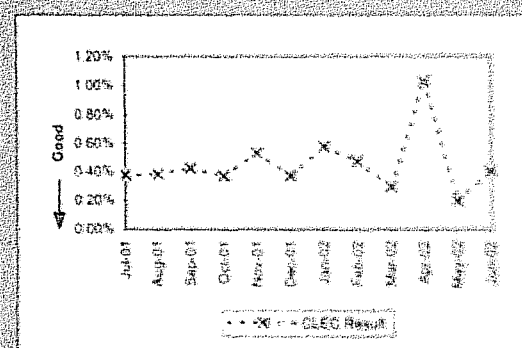


Checklist #1 - Trunk Blocking

Trunk Blockage to Qwest Tandem Offices (Percent) (NI-1C) (Diagnostic)				
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	345.75	134466	0.26%	2.19%
Aug-01	614.08	126258	0.49%	3.55%
Sep-01	579.92	128898	0.45%	3.71%
Oct-01	1152.68	133626	0.86%	4.22%
Nov-01	1087.75	137490	0.79%	4.79%
Dec-01	951.42	143010	0.67%	4.97%
Jan-02	1442.5	142938	1.01%	5.50%
Feb-02	1263.9	148626	0.85%	4.48%
Mar-02	1001.48	150066	0.67%	4.18%
Apr-02	1342.85	147858	0.91%	4.80%
May-02	942.4	159066	0.59%	3.80%
Jun-02	93.77	159354	0.06%	0.71%



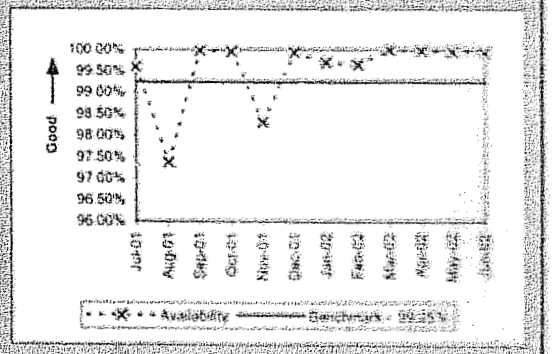
Trunk Blockage to Qwest End Offices (Percent) (NI-1D) (Diagnostic)				
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	238	63106	0.38%	1.72%
Aug-01	219.92	57130	0.38%	3.47%
Sep-01	286.17	67218	0.43%	2.87%
Oct-01	234.38	63106	0.37%	2.67%
Nov-01	362.55	67906	0.53%	3.94%
Dec-01	258.32	69010	0.37%	3.89%
Jan-02	415.05	71793	0.58%	3.83%
Feb-02	359.08	75309	0.48%	3.32%
Mar-02	231.54	77757	0.30%	2.80%
Apr-02	826.49	80205	1.03%	4.74%
May-02	160.58	80830	0.20%	1.71%
Jun-02	337.7	82750	0.41%	2.96%



Checklist #2 - Gateway Availability

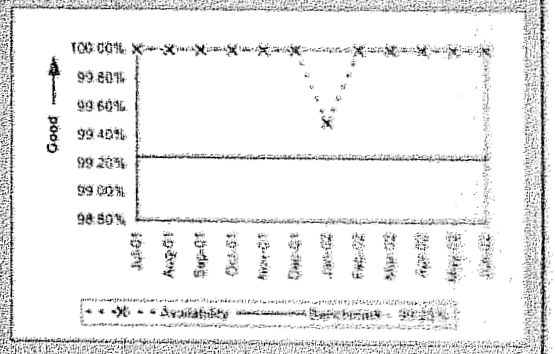
Gateway Availability - IMA-GUI (Percent) All (GA-1A) (Benchmark)

Date	Availability
Jul-01	99.60%
Aug-01	97.38%
Sep-01	99.99%
Oct-01	99.97%
Nov-01	98.32%
Dec-01	99.94%
Jan-02	99.71%
Feb-02	99.65%
Mar-02	100.00%
Apr-02	99.98%
May-02	99.96%
Jun-02	99.93%



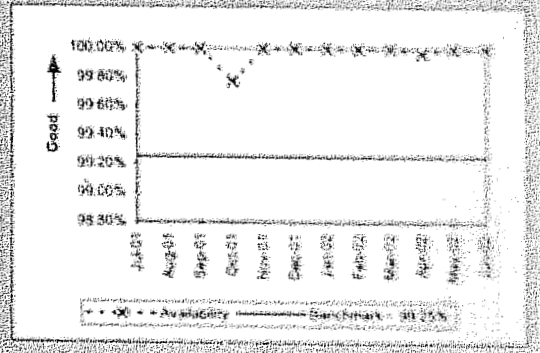
Gateway Availability - IMA-GUI (Percent) Fetch-n-Stuff (GA-1B) (Benchmark)

Date	Availability
Jul-01	100.00%
Aug-01	100.00%
Sep-01	100.00%
Oct-01	100.00%
Nov-01	100.00%
Dec-01	100.00%
Jan-02	99.50%
Feb-02	100.00%
Mar-02	100.00%
Apr-02	100.00%
May-02	100.00%
Jun-02	100.00%



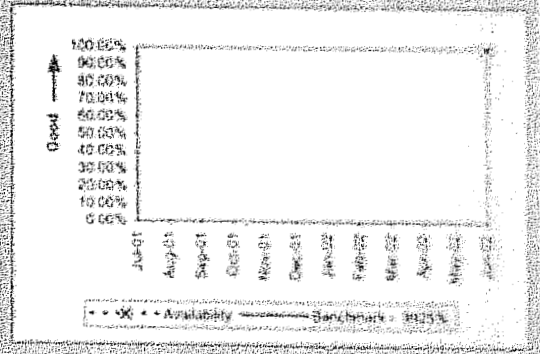
Gateway Availability - IMA-GUI (Percent) Data Arbiter (GA-1C) (Benchmark)

Date	Availability
Jul-01	100.00%
Aug-01	100.00%
Sep-01	100.00%
Oct-01	99.77%
Nov-01	100.00%
Dec-01	100.00%
Jan-02	100.00%
Feb-02	100.00%
Mar-02	100.00%
Apr-02	99.97%
May-02	100.00%
Jun-02	100.00%



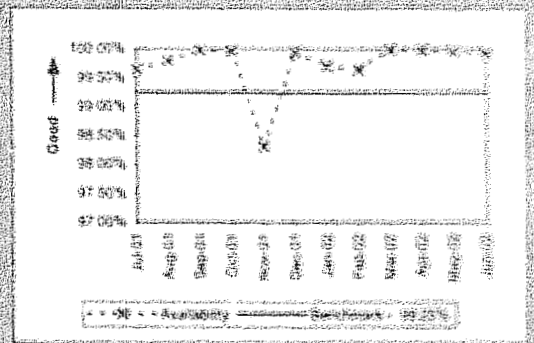
Gateway Availability - IMA-GUI (Percent) SIA (GA-1D) (Benchmark)

Date	Availability
Jul-01	
Aug-01	
Sep-01	
Oct-01	
Nov-01	
Dec-01	
Jan-02	
Feb-02	
Mar-02	
Apr-02	
May-02	
Jun-02	100.00%

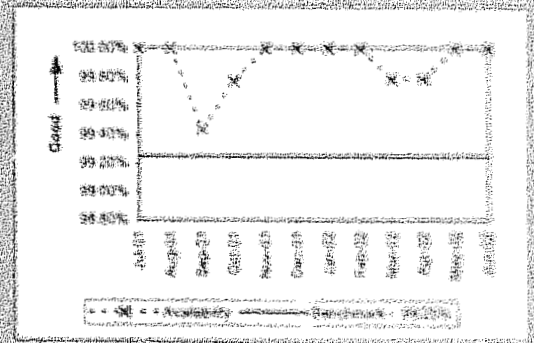


Checklist #2 - Gateway Availability

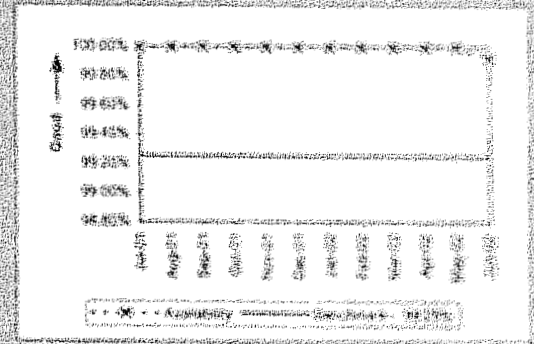
Gateway Availability - IMA-EDI (Percent) Default (GA-2) (Benchmark)	
Date	Availability
Jul-01	99.65%
Aug-01	99.79%
Sep-01	99.99%
Oct-01	99.97%
Nov-01	98.32%
Dec-01	99.94%
Jan-02	99.71%
Feb-02	99.65%
Mar-02	100.00%
Apr-02	99.99%
May-02	99.96%
Jun-02	99.93%



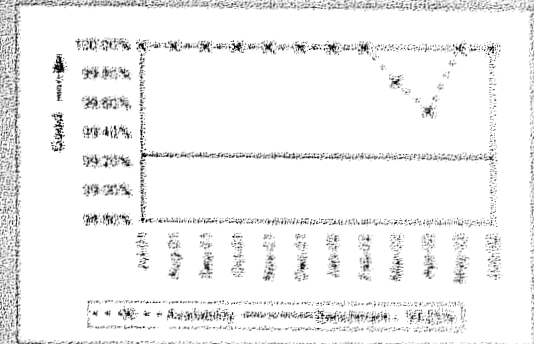
Gateway Availability - EB-TA (Percent) Default (GA-3) (Benchmark)	
Date	Availability
Jul-01	100.00%
Aug-01	100.00%
Sep-01	99.44%
Oct-01	99.78%
Nov-01	100.00%
Dec-01	100.00%
Jan-02	100.00%
Feb-02	100.00%
Mar-02	99.79%
Apr-02	99.79%
May-02	100.00%
Jun-02	100.00%



System Availability - EXACT (Percent) Default (GA-4) (Benchmark)	
Date	Availability
Jul-01	100.00%
Aug-01	100.00%
Sep-01	100.00%
Oct-01	100.00%
Nov-01	100.00%
Dec-01	100.00%
Jan-02	100.00%
Feb-02	100.00%
Mar-02	100.00%
Apr-02	100.00%
May-02	100.00%
Jun-02	99.93%



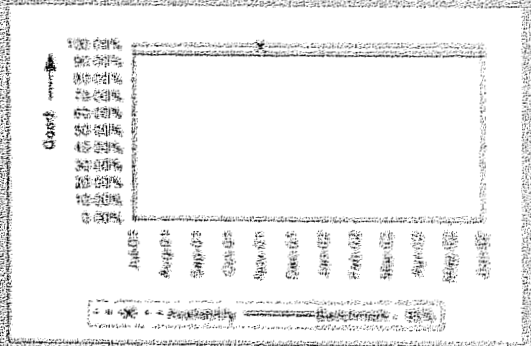
Gateway Availability - GUI - Repair (Percent) Default (GA-6) (Benchmark)	
Date	Availability
Jul-01	100.00%
Aug-01	100.00%
Sep-01	100.00%
Oct-01	100.00%
Nov-01	100.00%
Dec-01	100.00%
Jan-02	100.00%
Feb-02	100.00%
Mar-02	99.77%
Apr-02	99.57%
May-02	100.00%
Jun-02	100.00%



Checklist #2 - Gateway Availability

Timely Outage Resolution following Software Releases (Percent) Default (GA-7) (Benchmark)

Date	Availability
Jul-01	
Aug-01	
Sep-01	
Oct-01	
Nov-01	100.00%
Dec-01	
Jan-02	
Feb-02	
Mar-02	
Apr-02	
May-02	
Jun-02	

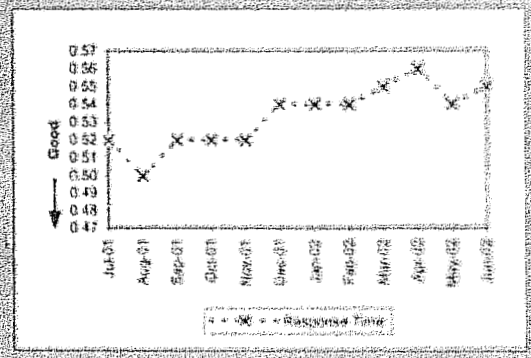


If the outage volume is less than 20 in the reporting month, the standard is 1 miss

Checklist #2 - Preorder Response Times - IMA

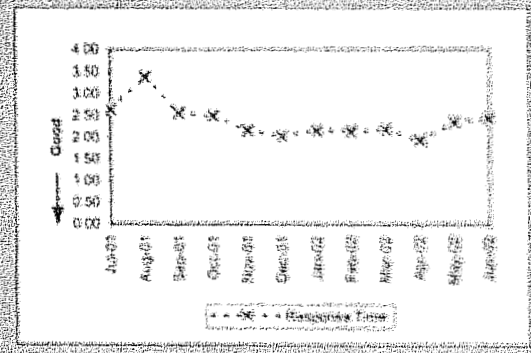
Pre-Order Response Times (Appt. Scheduler) (Avg Sec) IMA Request (PO-1A-1(a)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	902.2	1735	0.52	0.09
Aug-01	1187.5	2375	0.50	0.09
Sep-01	1100.84	2117	0.52	0.14
Oct-01	1233.44	2372	0.52	0.09
Nov-01	1210.56	2328	0.52	0.15
Dec-01	1598.4	2960	0.54	0.11
Jan-02	1733.94	3211	0.54	0.15
Feb-02	1540.62	2853	0.54	0.11
Mar-02	1545.5	2810	0.55	0.11
Apr-02	1579.76	2821	0.56	0.24
May-02	1548.18	2867	0.54	0.12
Jun-02	1301.85	2367	0.55	0.24



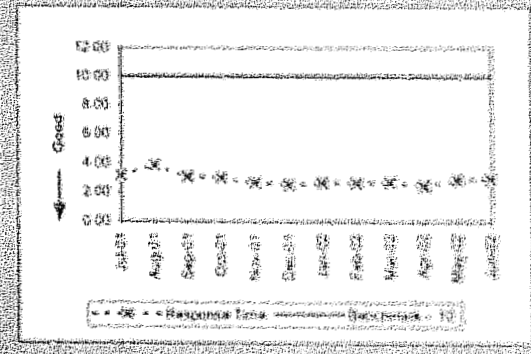
Pre-Order Response Times (Appt. Scheduler) (Avg Sec) IMA Response/Accept (PO-1A-1(b,c)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	4597.75	1735	2.65	1.47
Aug-01	8075	2375	3.40	3.20
Sep-01	5440.69	2117	2.57	0.56
Oct-01	5953.72	2372	2.51	1.13
Nov-01	5051.76	2328	2.17	1.58
Dec-01	6038.4	2960	2.04	1.39
Jan-02	6967.87	3211	2.17	1.43
Feb-02	6133.95	2853	2.15	1.55
Mar-02	6182	2810	2.20	2.01
Apr-02	5472.74	2821	1.94	0.82
May-02	6794.79	2867	2.37	1.61
Jun-02	5775.48	2367	2.44	1.32



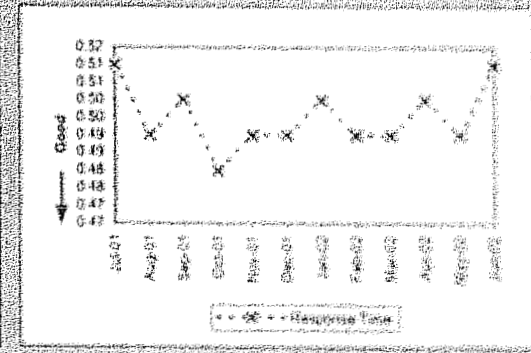
Pre-Order Response Times (Appt. Scheduler) (Avg Sec) IMA Aggregate (PO-1A-1 Total) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	5499.95	1735	3.17	
Aug-01	9262.5	2375	3.90	
Sep-01	6541.53	2117	3.09	
Oct-01	7187.16	2372	3.03	
Nov-01	6262.32	2328	2.69	
Dec-01	7636.8	2960	2.58	
Jan-02	8701.81	3211	2.71	
Feb-02	7674.57	2853	2.69	
Mar-02	7727.5	2810	2.75	
Apr-02	7052.5	2821	2.50	
May-02	8342.97	2867	2.91	
Jun-02	7077.33	2367	2.99	



Pre-Order Response Times (Service Availability) (Avg Sec) IMA Request (PO-1A-2(a)) (Diagnostic)

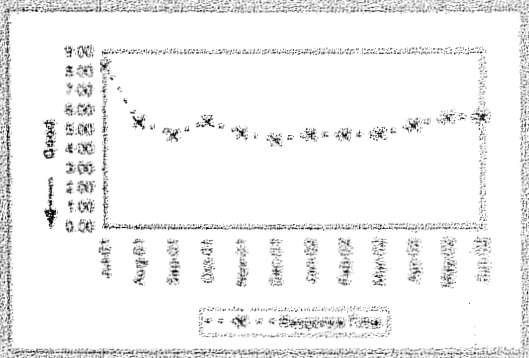
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	1386.18	2718	0.51	0.09
Aug-01	1666	3400	0.49	0.06
Sep-01	1635	3270	0.50	0.17
Oct-01	1687.2	3515	0.48	0.08
Nov-01	1614.65	3285	0.49	0.23
Dec-01	1803.54	3706	0.49	0.06
Jan-02	1915.18	3820	0.50	0.15
Feb-02	1669.46	3379	0.49	0.06
Mar-02	1935.43	3943	0.49	0.07
Apr-02	1990.41	3982	0.50	0.15
May-02	1999.01	4049	0.49	0.08
Jun-02	1749.99	3453	0.51	0.24



Checklist #2 - Preorder Response Times - IMA

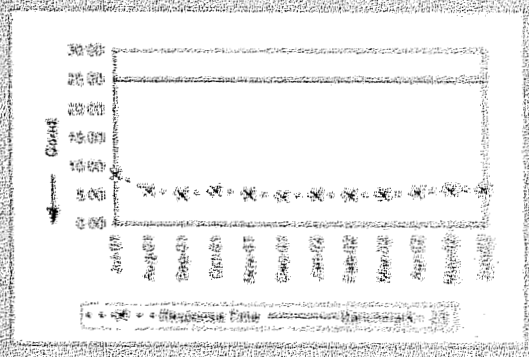
Pre-Order Response Times (Service Availability) (Avg Sec) IMA Response (PO-1A-2(b)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	22477.86	2718	8.27	2.14
Aug-01	18394	3400	5.41	2.96
Sep-01	15565.2	3270	4.76	2.64
Oct-01	19191.9	3515	5.46	3.56
Nov-01	15973.07	3285	4.86	4.63
Dec-01	16687.24	3706	4.50	4.16
Jan-02	18228.93	3820	4.77	4.31
Feb-02	16088.53	3379	4.76	4.03
Mar-02	18980.72	3943	4.81	4.21
Apr-02	20816.61	3982	5.23	4.38
May-02	22850.47	4049	5.64	4.84
Jun-02	19538.29	3453	5.66	4.92



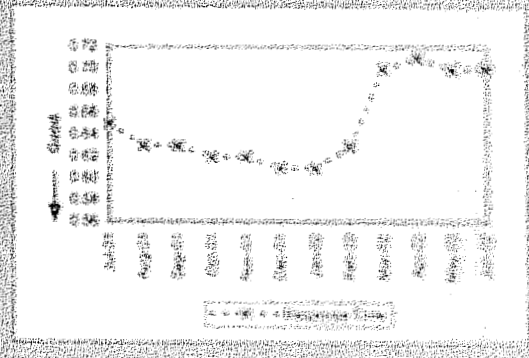
Pre-Order Response Times (Service Availability) (Avg Sec) IMA Aggregate (PO-1A-2 Total) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	23864.04	2718	8.78	
Aug-01	20060	3400	5.90	
Sep-01	17200.2	3270	5.26	
Oct-01	20879.1	3515	5.94	
Nov-01	17587.72	3285	5.35	
Dec-01	18490.78	3706	4.99	
Jan-02	20144.11	3820	5.27	
Feb-02	17757.99	3379	5.26	
Mar-02	20916.15	3943	5.30	
Apr-02	22807.02	3982	5.73	
May-02	24849.48	4049	6.14	
Jun-02	21288.28	3453	6.17	



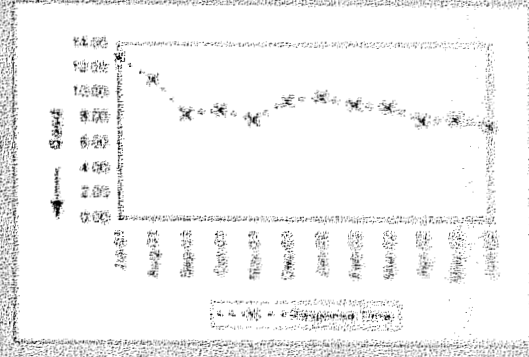
Pre-Order Response Times (Facility Check) (Avg Sec) IMA Request (PO-1A-3(a)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	251.55	387	0.65	0.07
Aug-01	341.46	542	0.63	0.06
Sep-01	304.29	483	0.63	0.06
Oct-01	342.24	552	0.62	0.05
Nov-01	326.74	527	0.62	0.06
Dec-01	403.21	661	0.61	0.07
Jan-02	430.66	706	0.61	0.06
Feb-02	408.87	649	0.63	0.07
Mar-02	502.6	718	0.70	0.07
Apr-02	516.88	728	0.71	0.15
May-02	516.6	738	0.70	0.07
Jun-02	437.5	625	0.70	0.07



Pre-Order Response Times (Facility Check) (Avg Sec) IMA Response (PO-1A-3(b)) (Diagnostic)

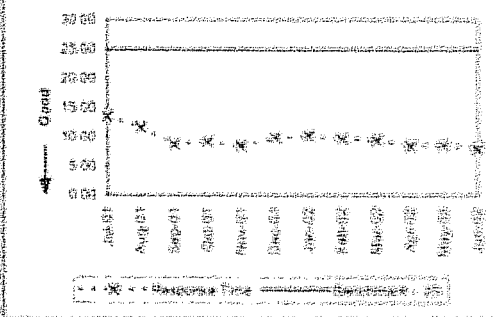
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	4992.3	387	12.90	3.63
Aug-01	6005.36	542	11.08	7.05
Sep-01	3994.41	483	8.27	2.86
Oct-01	4763.76	552	8.63	5.18
Nov-01	4147.49	527	7.87	2.26
Dec-01	6220.01	661	9.41	3.87
Jan-02	6862.32	706	9.72	3.59
Feb-02	5905.9	649	9.10	3.16
Mar-02	6390.2	718	8.90	3.93
Apr-02	5722.08	728	7.86	3.71
May-02	5874.48	738	7.96	3.90
Jun-02	4631.25	625	7.41	3.74



Checklist #2 - Preorder Response Times - IMA

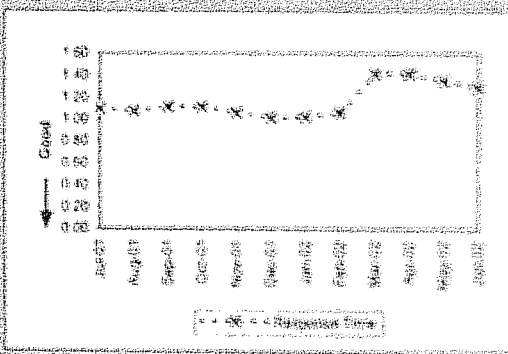
Pre-Order Response Times (Facility Check) (Avg Sec) IMA Aggregate (PO-1A-3 Total) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	5243.85	387	13.55	
Aug-01	6346.82	542	11.71	
Sep-01	4298.7	483	8.90	
Oct-01	5106	552	9.25	
Nov-01	4474.23	527	8.49	
Dec-01	6623.22	661	10.02	
Jan-02	7292.98	706	10.33	
Feb-02	6314.77	649	9.73	
Mar-02	6892.8	718	9.60	
Apr-02	6238.96	728	8.57	
May-02	6391.08	738	8.66	
Jun-02	5068.75	625	8.11	



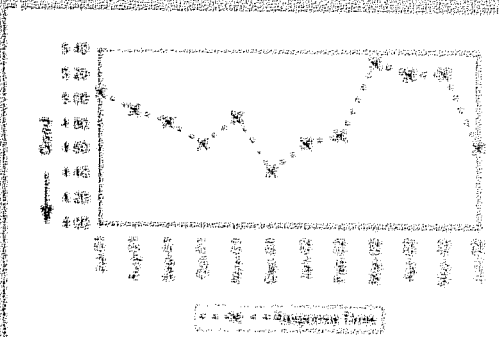
Pre-Order Response Times (Address Validation) (Avg Sec) IMA Request (PO-1A-4(a)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	4216.3	3833	1.10	0.18
Aug-01	5564.16	5152	1.08	0.16
Sep-01	5418.56	4838	1.12	0.21
Oct-01	5821.76	5198	1.12	0.25
Nov-01	5664.41	5289	1.07	0.32
Dec-01	5823.21	5688	1.02	0.33
Jan-02	6055.01	5902	1.03	0.24
Feb-02	5649.5	5271	1.07	0.23
Mar-02	8691.4	6110	1.42	0.49
Apr-02	9265.89	6531	1.42	0.55
May-02	9229.6	6795	1.36	0.55
Jun-02	7234.52	5571	1.30	0.66



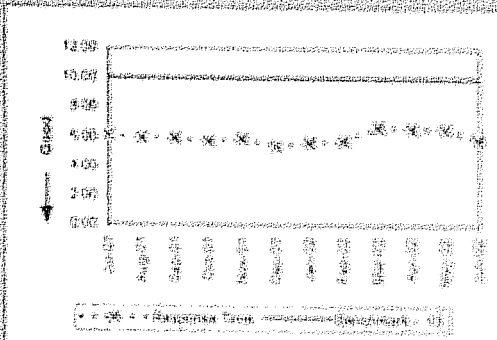
Pre-Order Response Times (Address Validation) (Avg Sec) IMA Response (PO-1A-4(b)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	19394.98	3833	5.06	4.32
Aug-01	25347.84	5152	4.92	2.88
Sep-01	23367.54	4838	4.83	2.84
Oct-01	24170.7	5198	4.65	2.79
Nov-01	25762.56	5289	4.87	2.54
Dec-01	25264.91	5688	4.44	2.66
Jan-02	27527.29	5902	4.66	3.08
Feb-02	24920.7	5271	4.73	2.77
Mar-02	32419.17	6110	5.31	3.27
Apr-02	34082.92	6531	5.22	2.95
May-02	35518.04	6795	5.23	3.07
Jun-02	25843.37	5571	4.54	2.19



Pre-Order Response Times (Address Validation) (Avg Sec) IMA Aggregate (PO-1A-4 Total) (Benchmark)

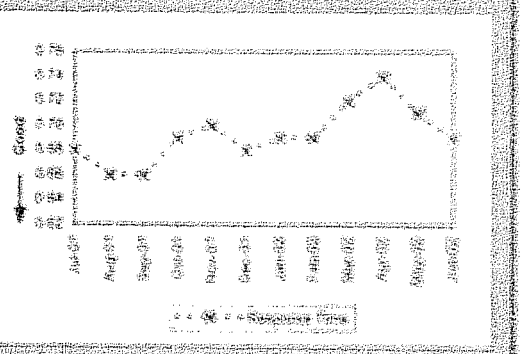
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	23611.28	3833	6.16	
Aug-01	30912	5152	6.00	
Sep-01	28786.1	4838	5.95	
Oct-01	29992.46	5198	5.77	
Nov-01	31426.97	5289	5.94	
Dec-01	31088.12	5688	5.47	
Jan-02	33582.3	5902	5.69	
Feb-02	30570.2	5271	5.80	
Mar-02	41110.57	6110	6.73	
Apr-02	43348.81	6531	6.64	
May-02	44747.64	6795	6.59	
Jun-02	33077.89	5571	5.94	



Checklist #2 - Preorder Response Times - IMA

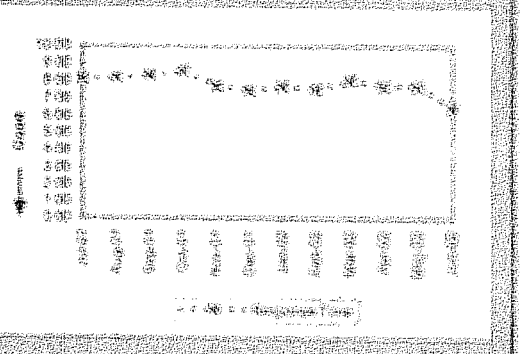
Pre-Order Response Times (Get CSR) (Avg Sec) IMA Request (PO-1A-5(a)) (Diagnostic)

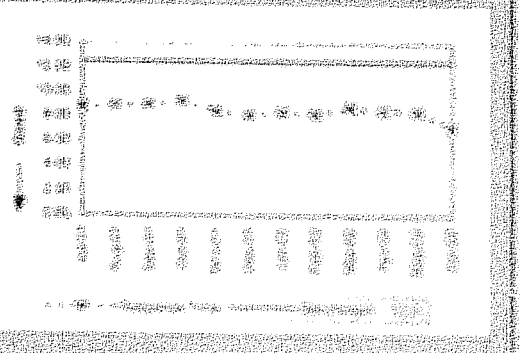
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	261.8	385	0.68	0.09
Aug-01	372.9	565	0.66	0.05
Sep-01	331.32	502	0.66	0.05
Oct-01	391.23	567	0.69	0.27
Nov-01	450.21	643	0.70	0.31
Dec-01	556.34	817	0.68	0.28
Jan-02	606.01	884	0.69	0.22
Feb-02	540.82	786	0.69	0.23
Mar-02	677.06	936	0.72	0.33
Apr-02	732.72	984	0.74	0.49
May-02	712.28	999	0.71	0.49
Jun-02	531.33	774	0.69	0.07

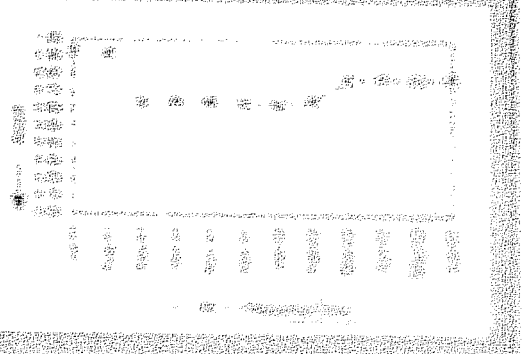


Pre-Order Response Times (Get CSR) (Avg Sec) IMA Response (PO-1A-5(b)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	3137.75	385	8.15	1.36
Aug-01	4672.55	565	8.27	2.12
Sep-01	4196.72	502	8.36	3.50
Oct-01	4881.87	567	8.61	3.14
Nov-01	4989.91	643	7.76	2.89
Dec-01	6140.36	817	7.52	2.77
Jan-02	6848	884	7.75	2.88
Feb-02	5936.37	786	7.55	2.58
Mar-02	7569.86	936	8.09	3.55
Apr-02	7649.45	984	7.77	2.55
May-02	7737.61	999	7.75	2.96
Jun-02	5967.35	774	8.55	3.49



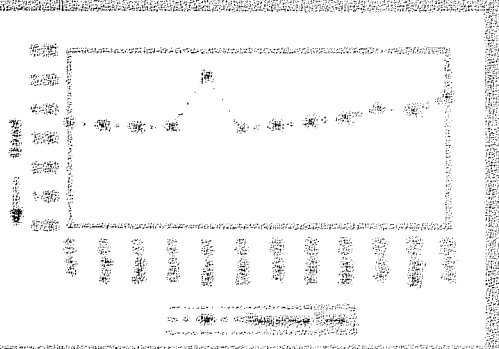




Checklist #2 - Preorder Response Times - SGAT

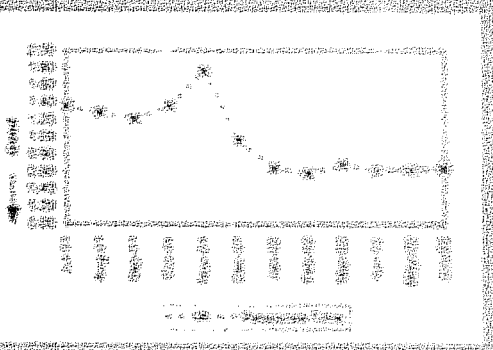
Pre-Order Response Times (TN Reservation) (Avg Sec) IMA Response (PO-1A-4) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	26819.04	7576	3.54	1.30
Aug-01	34047.64	9812	3.47	1.40
Sep-01	4952.16	1448	3.42	1.31
Oct-01	5426.32	1578	3.44	1.37
Nov-01	7561.88	1465	5.16	4.62
Dec-01	5306.52	1576	3.37	1.24
Jan-02	5394.82	1556	3.47	1.72
Feb-02	5178.67	1437	3.60	1.73
Mar-02	5972.92	1602	3.73	1.43
Apr-02	6393.37	1579	4.05	1.75
May-02	6568.62	1651	3.98	1.48
Jun-02	6360.92	1428	4.45	1.86



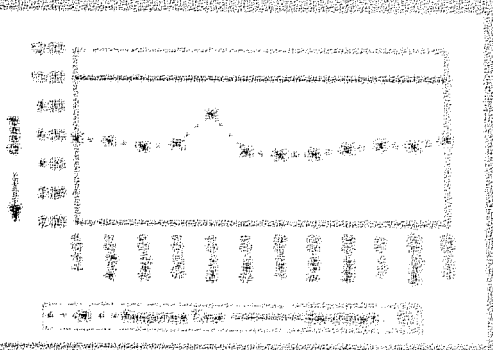
Pre-Order Response Times (TN Reservation) (Avg Sec) IMA Access (PO-1A-5) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	10303.36	7576	1.36	0.56
Aug-01	12657.48	9812	1.29	0.70
Sep-01	1766.56	1448	1.22	0.62
Oct-01	2161.86	1578	1.37	2.97
Nov-01	2585.74	1465	1.77	0.55
Dec-01	1535.06	1576	0.97	1.15
Jan-02	1007.34	1556	0.65	0.78
Feb-02	854.51	1437	0.59	0.23
Mar-02	1104.44	1602	0.69	0.25
Apr-02	984.68	1579	0.62	0.15
May-02	1034.37	1651	0.63	0.16
Jun-02	922.62	1428	0.65	0.19



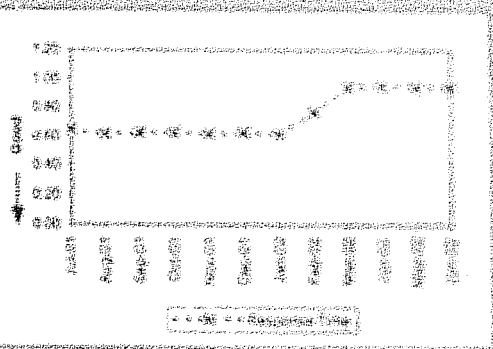
Pre-Order Response Times (TN Reservation) (Avg Sec) IMA Aggregate (PO-1A-6 Total) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	44243.84	7576	5.84	
Aug-01	55732.16	9812	5.68	
Sep-01	7645.44	1448	5.28	
Oct-01	8615.88	1578	5.46	
Nov-01	11103.11	1465	7.58	
Dec-01	7843.74	1576	4.98	
Jan-02	7398.27	1556	4.75	
Feb-02	6979.69	1437	4.86	
Mar-02	8325.51	1602	5.20	
Apr-02	8627.19	1579	5.46	
May-02	8885.49	1651	5.38	
Jun-02	8405.1	1428	5.89	



Pre-Order Response Times (Loop Qualification Tools) (Avg Sec) IMA Request (PO-1A-7) (Diagnostic)

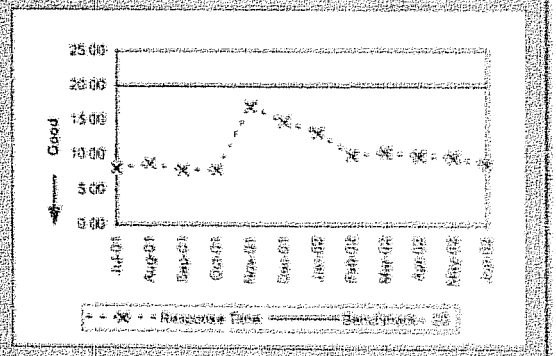
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	219.05	337	0.65	0.07
Aug-01	298.22	481	0.62	0.07
Sep-01	290.43	461	0.63	0.14
Oct-01	320.67	509	0.63	0.16
Nov-01	301.92	487	0.62	0.13
Dec-01	331.91	530	0.63	0.06
Jan-02	338.37	544	0.62	0.11
Feb-02	2535.4	3282	0.77	0.25
Mar-02	3407.79	3605	0.95	0.21
Apr-02	3451.65	3586	0.96	0.28
May-02	3506.33	3703	0.95	0.21
Jun-02	2995.25	3153	0.95	0.28



Checklist #2 - Preorder Response Times - IMA

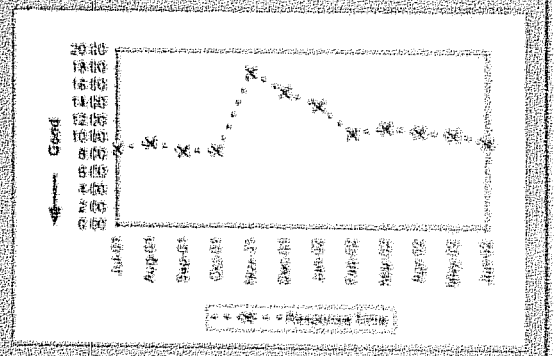
Pre-Order Response Times (Loop Qualification Tools) (Avg Sec) IMA Response (PO-1A-7(b)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	2733.07	337	8.11	2.06
Aug-01	4237.61	481	8.81	4.65
Sep-01	3632.68	461	7.88	4.16
Oct-01	4066.91	509	7.99	2.97
Nov-01	8284.03	487	17.01	15.37
Dec-01	7861.73	530	14.83	11.83
Jan-02	7216.95	544	13.27	7.79
Feb-02	32707.68	3282	9.97	5.50
Mar-02	37615.98	3605	10.43	6.27
Apr-02	35516.6	3586	9.90	5.24
May-02	35821.73	3703	9.67	5.28
Jun-02	27510.82	3153	8.73	5.12



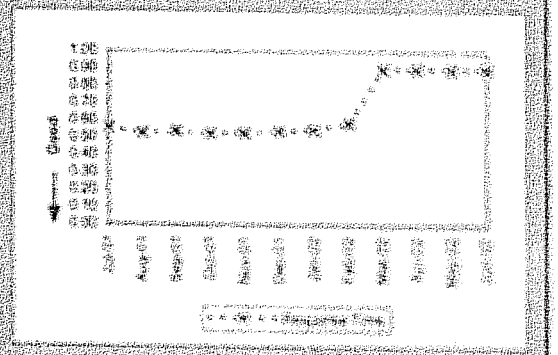
Pre-Order Response Times (Loop Qualification Tools) (Avg Sec) IMA Aggregate (PO-1A-7 Total) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	2952.12	337	8.76	
Aug-01	4535.83	481	9.43	
Sep-01	3923.11	461	8.51	
Oct-01	4387.58	509	8.62	
Nov-01	8585.95	487	17.63	
Dec-01	8193.64	530	15.46	
Jan-02	7555.32	544	13.89	
Feb-02	35243.08	3282	10.74	
Mar-02	41023.77	3605	11.38	
Apr-02	38968.25	3586	10.87	
May-02	39328.06	3703	10.62	
Jun-02	30506.07	3153	9.68	



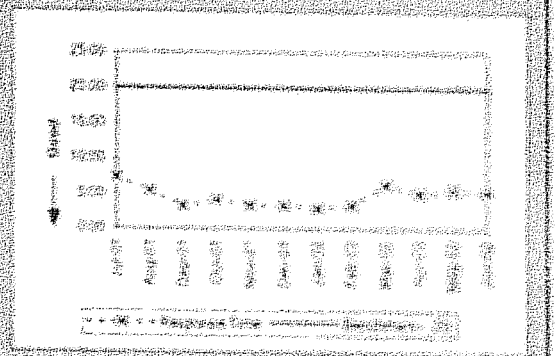
Pre-Order Response Times (Resale of Qwest DSL Qualification) (Avg Sec) IMA Request (PO-1A-8(a)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	175.84	314	0.56	0.09
Aug-01	228.96	432	0.53	0.07
Sep-01	233.28	432	0.54	0.08
Oct-01	240.62	454	0.53	0.06
Nov-01	224.72	424	0.53	0.06
Dec-01	237.06	439	0.54	0.07
Jan-02	249.7	454	0.55	0.14
Feb-02	240.13	407	0.59	0.14
Mar-02	410.4	456	0.90	0.05
Apr-02	412.2	458	0.90	0.12
May-02	420.3	467	0.90	0.06
Jun-02	347.4	386	0.90	0.06



Pre-Order Response Times (Resale of Qwest DSL Qualification) (Avg Sec) IMA Response (PO-1A-8(b)) (Diagnostic)

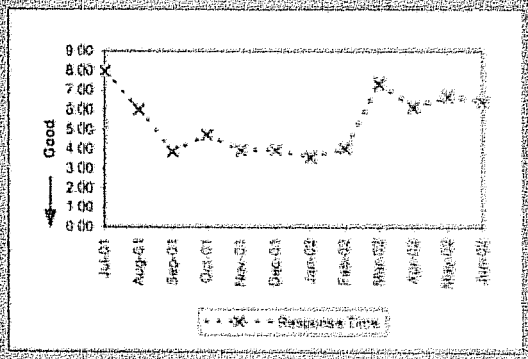
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	2336.16	314	7.44	5.34
Aug-01	2375	432	5.50	4.14
Sep-01	1447.2	432	3.35	2.77
Oct-01	1920.42	454	4.23	5.58
Nov-01	1458.08	424	3.42	2.56
Dec-01	1510.16	439	3.44	3.15
Jan-02	1389.24	454	3.06	2.52
Feb-02	1416.36	407	3.48	4.43
Mar-02	2936.64	456	6.44	15.43
Apr-02	2390.76	458	5.22	4.13
May-02	2694.59	467	5.77	5.25
Jun-02	2126.86	386	5.51	5.54



Checklist #2 - Preorder Response Times - IMA

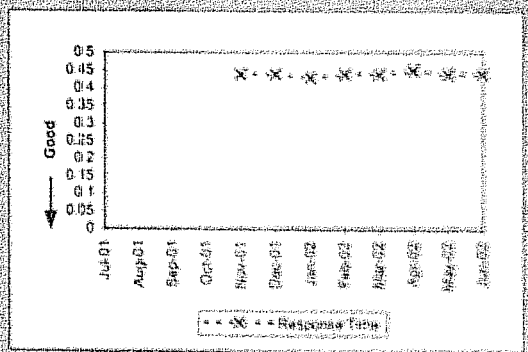
Pre-Order Response Times (Resale of Qwest DSL Qualification) (Avg Sec) IMA Aggregate (PO-1A-8 Total) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	2512	314	8.00	
Aug-01	2604.96	432	6.03	
Sep-01	1680.48	432	3.89	
Oct-01	2161.04	454	4.76	
Nov-01	1674.8	424	3.95	
Dec-01	1747.22	439	3.98	
Jan-02	1638.94	454	3.61	
Feb-02	1656.49	407	4.07	
Mar-02	3347.04	456	7.34	
Apr-02	2802.96	458	6.12	
May-02	3114.89	467	6.67	
Jun-02	2474.26	386	6.41	



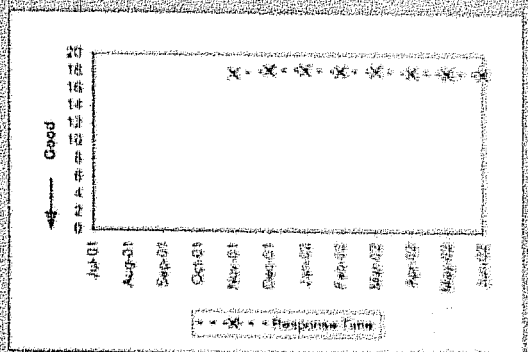
Pre-Order Response Times (Connecting Facility Assignment) (Avg Sec) IMA Request (PO-1A-9(a)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01	612.96	1401	0.44	0.08
Dec-01	779.61	1760	0.44	0.02
Jan-02	999.98	2303	0.43	0.08
Feb-02	912.04	2052	0.44	0.02
Mar-02	1015.1	2286	0.44	0.02
Apr-02	1039.54	2320	0.45	0.11
May-02	1051.3	2367	0.44	0.04
Jun-02	862.11	1941	0.44	0.17



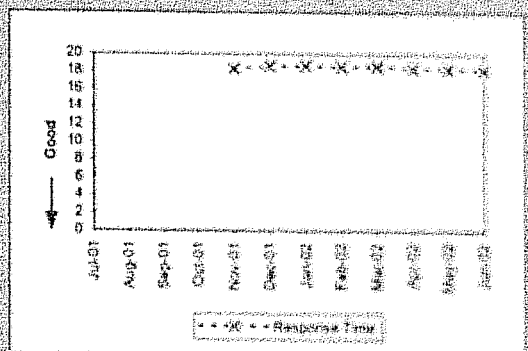
Pre-Order Response Times (Connecting Facility Assignment) (Avg Sec) IMA Response (PO-1A-9(b)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01	25049.35	1401	17.88	6.59
Dec-01	32078.54	1760	18.23	6.67
Jan-02	42068.82	2303	18.27	6.36
Feb-02	37187.13	2052	18.12	6.35
Mar-02	41565.94	2286	18.18	6.29
Apr-02	41713.65	2320	17.98	6.17
May-02	42441.73	2367	17.93	6.15
Jun-02	34614.51	1941	17.83	6.28



Pre-Order Response Times (Connecting Facility Assignment) (Avg Sec) IMA Aggregate (PO-1A-9 Total) (Benchmark)

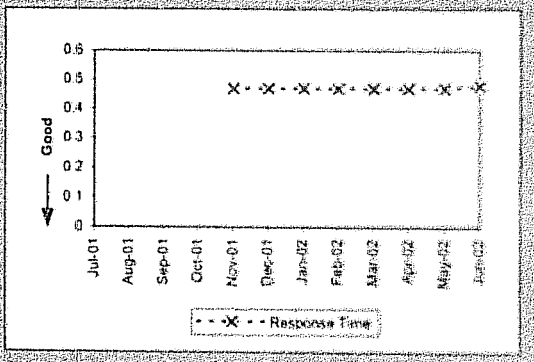
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01	25662.31	1401	18.32	
Dec-01	32858.15	1760	18.67	
Jan-02	43068.8	2303	18.70	
Feb-02	38099.17	2052	18.57	
Mar-02	42581.04	2286	18.63	
Apr-02	42753.19	2320	18.43	
May-02	43493.03	2367	18.37	
Jun-02	35476.62	1941	18.28	



Checklist #2 - Preorder Response Times - IMA

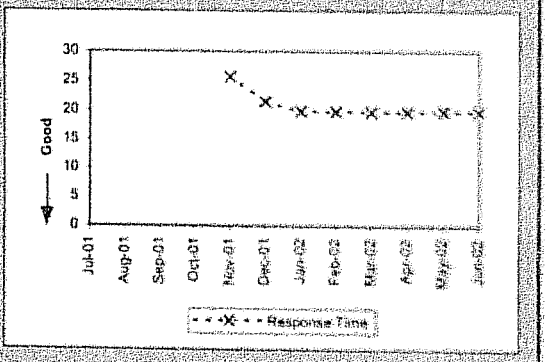
Pre-Order Response Times (Meet Point Inquiry) (Avg Sec) IMA Request (PO-1A-10(a)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01	146.17	311	0.47	0.03
Dec-01	169.2	360	0.47	0.04
Jan-02	165.44	352	0.47	0.03
Feb-02	228.88	488	0.47	0.03
Mar-02	241.26	514	0.47	0.03
Apr-02	249.92	533	0.47	0.10
May-02	254.02	540	0.47	0.04
Jun-02	226.73	470	0.48	0.15



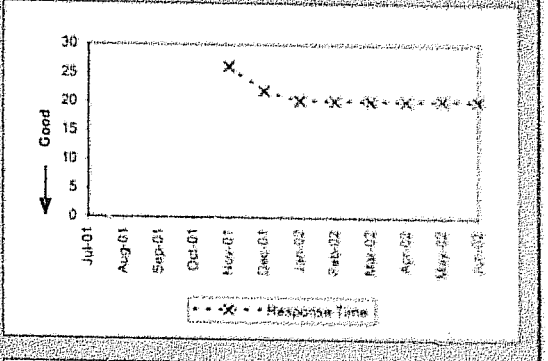
Pre-Order Response Times (Meet Point Inquiry) (Avg Sec) IMA Response (PO-1A-10(b)) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01	8011.36	311	25.76	2.74
Dec-01	7761.6	360	21.56	2.81
Jan-02	7004.8	352	19.90	1.66
Feb-02	9676.4	488	19.83	1.51
Mar-02	10163.81	514	19.77	1.66
Apr-02	10546.62	533	19.79	0.65
May-02	10758.19	540	19.92	0.77
Jun-02	9331.73	470	19.85	1.56



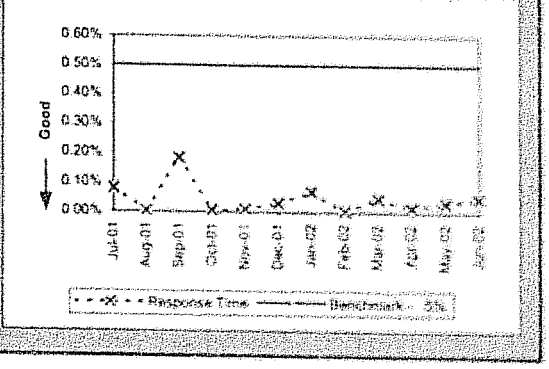
Pre-Order Response Times (Meet Point Inquiry) (Avg Sec) IMA Aggregate (PO-1A-10 Total) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01	8157.53	311	26.23	
Dec-01	7930.8	360	22.03	
Jan-02	7170.24	352	20.37	
Feb-02	9905.28	488	20.30	
Mar-02	10405.07	514	20.24	
Apr-02	10796.54	533	20.26	
May-02	11012.21	540	20.39	
Jun-02	9558.46	470	20.34	



Pre-Order Response Times (Timeout) (Percent) IMA Total (PO-1C-1) (Benchmark)

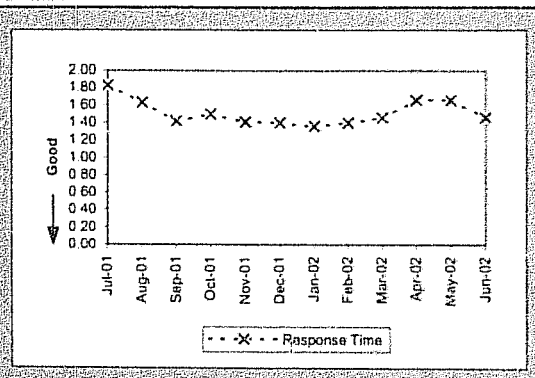
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	14	17299	0.08%	2.84%
Aug-01	1	22760	0.00%	0.66%
Sep-01	25	13576	0.18%	4.29%
Oct-01	1	14746	0.01%	0.82%
Nov-01	2	16162	0.01%	1.11%
Dec-01	6	18503	0.03%	1.80%
Jan-02	14	19746	0.07%	2.66%
Feb-02	1	20605	0.01%	0.70%
Mar-02	11	22991	0.05%	2.19%
Apr-02	4	23526	0.02%	1.30%
May-02	8	24184	0.03%	1.82%
Jun-02	10	20178	0.05%	2.23%



Checklist #2 - Preorder Response Times - IMA

Preorder Response Times (Rejected Query) (Avg Sec) IMA Total (PO-1D-1) (Diagnostic)

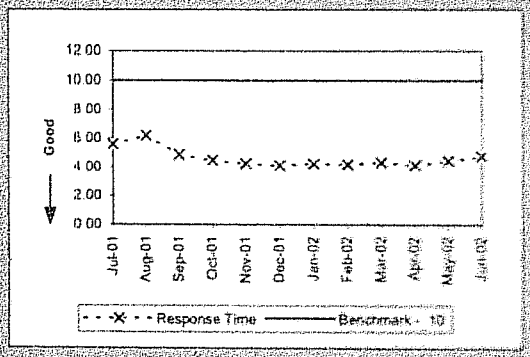
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	7462.74	4078	1.83	3.52
Aug-01	6943.8	4260	1.63	3.19
Sep-01	6066.24	4272	1.42	2.34
Oct-01	6414	4276	1.50	2.96
Nov-01	4633.26	3286	1.41	1.59
Dec-01	5394.2	3853	1.40	1.79
Jan-02	5204.72	3827	1.36	1.74
Feb-02	4648	3320	1.40	1.94
Mar-02	4914.36	3366	1.46	1.98
Apr-02	7425.18	4473	1.66	2.06
May-02	8768.12	5282	1.66	1.82
Jun-02	6521.82	4467	1.46	1.57



Checklist #2 - Preorder Response Times - EDI

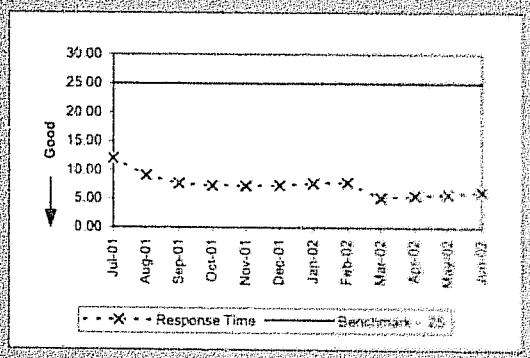
Pre-Order Response Times (Appt. Scheduler) (Avg Sec) EDI Request/Response (PO-1B-1) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	10609.6	2966	5.60	7.07
Aug-01	18095.86	3054	6.22	9.50
Sep-01	16071	3300	4.87	4.38
Oct-01	19845	4410	4.50	1.27
Nov-01	19771	4652	4.25	1.87
Dec-01	16990.88	4124	4.12	1.52
Jan-02	18494.88	4362	4.24	1.30
Feb-02	17011.4	4060	4.19	1.58
Mar-02	22667.85	5211	4.35	2.58
Apr-02	21322.7	5138	4.15	1.51
May-02	23172.48	5184	4.47	1.47
Jun-02	22271.13	4669	4.77	4.05



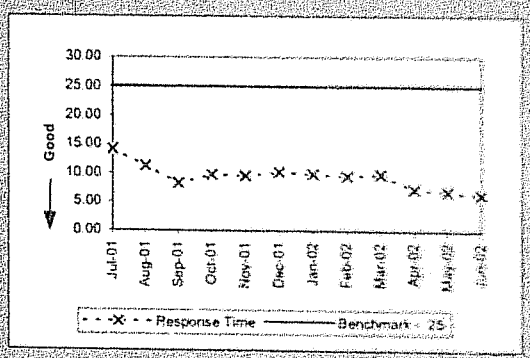
Pre-Order Response Times (Service Availability) (Avg Sec) EDI Request/Response (PO-1B-2) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	57776.04	4767	12.12	7.84
Aug-01	40253.3	4410	9.13	8.86
Sep-01	38210.24	4924	7.76	5.96
Oct-01	41792.94	5663	7.38	4.28
Nov-01	45155.76	6140	7.35	4.32
Dec-01	38922.07	5212	7.47	4.24
Jan-02	36076.53	4623	7.80	4.86
Feb-02	32776.4	4124	7.95	5.67
Mar-02	23836.81	4504	5.29	5.93
Apr-02	25689.31	4541	5.66	6.04
May-02	27098.65	4600	5.89	6.41
Jun-02	27055.72	4278	6.32	7.24



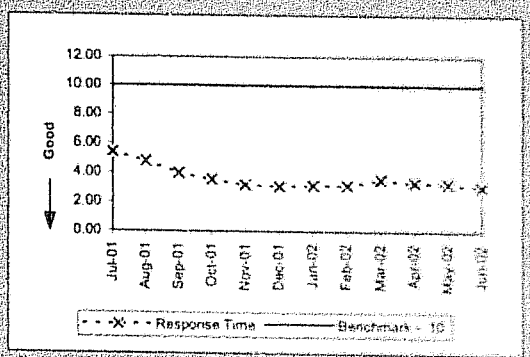
Pre-Order Response Times (Facility Check) (Avg Sec) EDI Request/Response (PO-1B-3) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	7685.56	542	14.18	9.33
Aug-01	6672.9	590	11.31	8.82
Sep-01	4910.04	593	8.28	4.88
Oct-01	4625.6	472	9.80	4.71
Nov-01	5156.32	536	9.62	3.01
Dec-01	4517.31	439	10.29	4.12
Jan-02	4360.4	440	9.91	2.62
Feb-02	3747.52	392	9.56	3.02
Mar-02	4890.6	495	9.88	5.35
Apr-02	3325.02	453	7.34	3.29
May-02	3042.9	441	6.90	3.02
Jun-02	2698.74	423	6.38	2.44



Pre-Order Response Times (Address Validation) (Avg Sec) EDI Request/Response (PO-1B-4) (Benchmark)

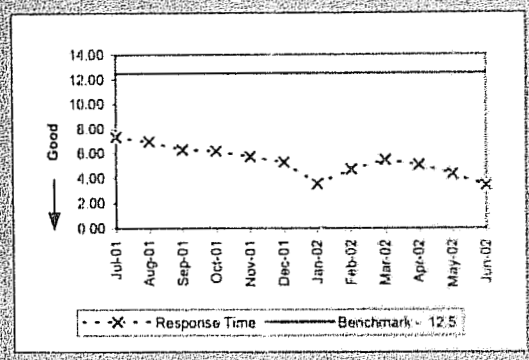
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	46276.54	8586	5.39	6.73
Aug-01	41925.38	8771	4.78	8.14
Sep-01	34542.14	8614	4.01	4.43
Oct-01	29406.09	8237	3.57	2.34
Nov-01	27382.81	8492	3.22	2.80
Dec-01	23380.89	7537	3.10	2.46
Jan-02	25136.96	7932	3.17	2.52
Feb-02	22779.7	7189	3.17	2.63
Mar-02	27069.48	7562	3.58	3.48
Apr-02	26030.52	7675	3.39	2.86
May-02	25460.48	7668	3.32	2.71
Jun-02	21294.18	6852	3.11	4.87



Checklist #2 - Preorder Response Times - EDI

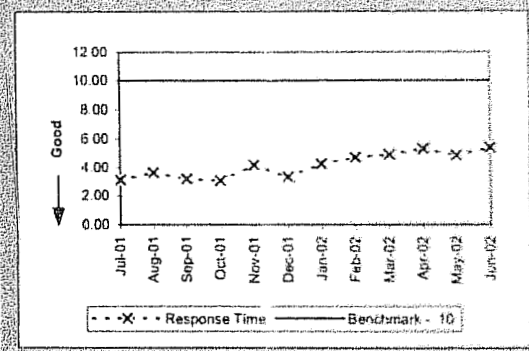
Pre-Order Response Times (Get CSR) (Avg Sec) EDI Request/Response (PO-1B-5) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
[illegible]	3211.95	437	7.35	6.86
[illegible]	3427.18	491	6.98	4.69
[illegible]	3168.9	503	6.30	1.91
[illegible]	2847.4	460	6.19	3.74
[illegible]	3917	684	5.73	1.70
[illegible]	3371.7	638	5.28	2.08
[illegible]	2318.22	651	3.56	1.86
[illegible]	2749.04	585	4.70	2.36
[illegible]	3772.59	690	5.47	2.34
[illegible]	3168.08	625	5.07	2.12
[illegible]	2695.43	621	4.34	1.63
[illegible]	1978.07	577	3.43	2.47



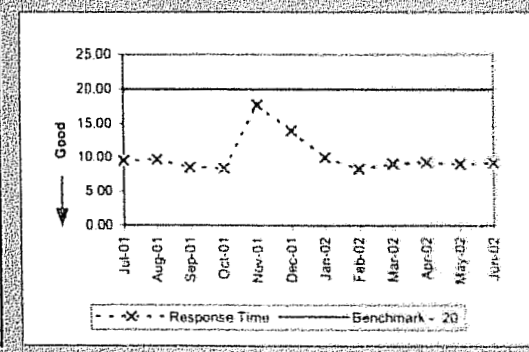
Pre-Order Response Times (TN Reservation) (Avg Sec) EDI Request/Response (PO-1B-6) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
[illegible]	89799.84	28782	3.12	4.02
[illegible]	81150.16	22294	3.64	8.52
[illegible]	2800	875	3.20	5.25
[illegible]	4889.88	1598	3.06	1.04
[illegible]	17357.08	4138	4.19	3.80
[illegible]	7532.29	2264	3.33	1.97
[illegible]	10182.28	2384	4.27	1.74
[illegible]	10299.6	2183	4.72	1.63
[illegible]	12154.79	2466	4.93	2.17
[illegible]	13196.3	2471	5.34	2.47
[illegible]	12137.38	2489	4.88	1.76
[illegible]	12397.68	2293	5.41	3.20



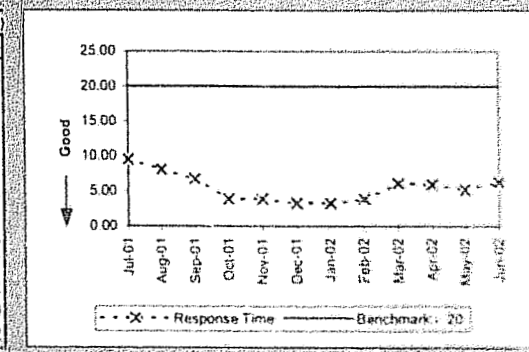
Pre-Order Response Times (Loop Qualification Tools) (Avg Sec) EDI Request/Response (PO-1B-7) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
[illegible]	5344.62	562	9.51	6.01
[illegible]	5703.6	588	9.70	6.99
[illegible]	4936.32	576	8.57	8.09
[illegible]	4231.86	502	8.43	2.60
[illegible]	9610.6	541	17.76	16.81
[illegible]	7814.31	559	13.98	11.95
[illegible]	5880.49	588	10.00	10.20
[illegible]	23849.97	2864	8.33	7.32
[illegible]	28699.81	3157	9.09	8.13
[illegible]	29511.93	3173	9.30	7.53
[illegible]	28598.5	3167	9.03	7.46
[illegible]	25996.86	2817	9.23	8.23



Pre-Order Response Times (Receive or Query DSL Qualification) (Avg Sec) EDI Request/Response (PO-1B-8) (Benchmark)

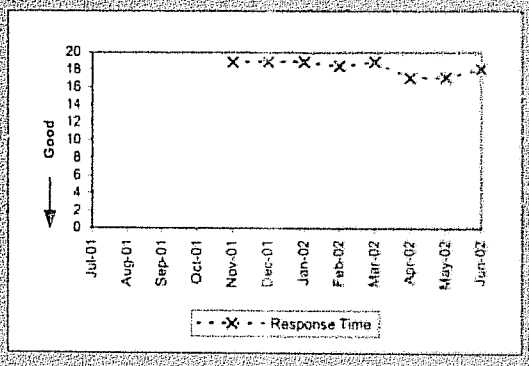
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
[illegible]	5493.04	577	9.52	11.12
[illegible]	4886.36	604	8.09	11.20
[illegible]	3842	565	6.80	3.43
[illegible]	2869.44	732	3.92	7.02
[illegible]	2870.82	738	3.89	5.58
[illegible]	2114.84	637	3.32	4.02
[illegible]	2287.71	687	3.33	2.61
[illegible]	2386.8	612	3.90	4.56
[illegible]	4228.12	692	6.11	12.17
[illegible]	3990	665	6.00	7.12
[illegible]	3436.11	657	5.23	5.49
[illegible]	3836.48	608	6.31	9.12



Checklist #2 - Preorder Response Times - EDI

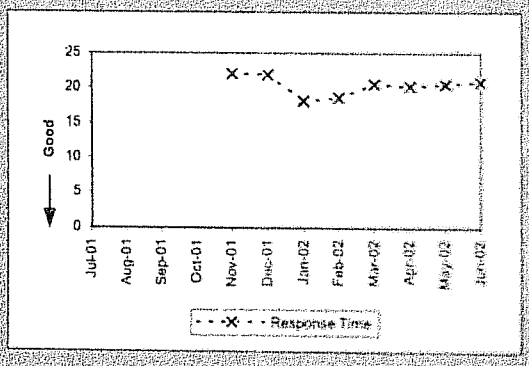
Pre-Order Response Times (Including Facility Assignment) (Avg Sec) EDI Request/Response (PO-1B-9) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01	23409.4	1239	18.89	6.27
Dec-01	21378.63	1128	18.95	6.27
Jan-02	21897.45	1156	18.94	6.47
Feb-02	17347.68	941	18.44	6.00
Mar-02	21872.31	1156	18.92	6.89
Apr-02	18315.3	1075	17.04	6.22
May-02	19607.49	1146	17.11	6.80
Jun-02	20079.12	1108	18.12	6.61



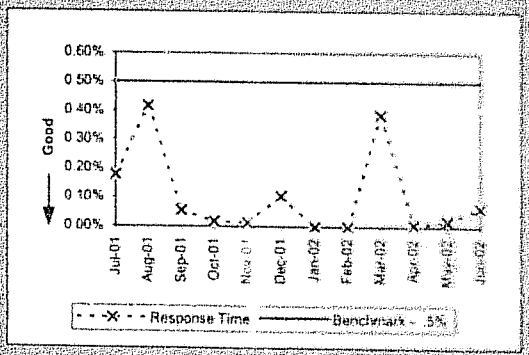
Pre-Order Response Times (Real Time Inquiry) (Avg Sec) EDI Request/Response (PO-1B-10) (Diagnostic)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01	9719.58	442	21.99	9.39
Dec-01	6481.68	388	21.86	2.99
Jan-02	8616.5	475	18.14	1.73
Feb-02	16552.04	892	18.56	2.31
Mar-02	16654.66	814	20.46	2.98
Apr-02	19219.38	953	20.17	1.62
May-02	20088.09	982	20.46	2.50
Jun-02	18734.65	902	20.77	2.77



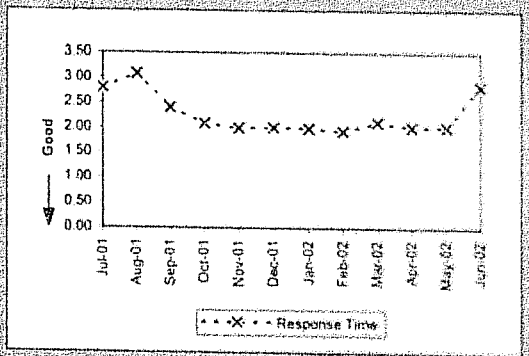
Pre-Order Response Times (Timeout) (Percent) EDI Total (PO-1C-2) (Benchmark)

Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	84	47303	0.18%	4.21%
Aug-01	171	40973	0.42%	6.45%
Sep-01	11	19961	0.06%	2.35%
Oct-01	4	22078	0.02%	1.35%
Nov-01	4	27606	0.01%	1.20%
Dec-01	24	22950	0.11%	3.23%
Jan-02	0	23298	0.00%	0.00%
Feb-02	0	23842	0.00%	0.00%
Mar-02	104	26851	0.39%	6.21%
Apr-02	2	26771	0.01%	0.86%
May-02	5	26960	0.02%	1.36%
Jun-02	16	24543	0.07%	2.55%



Pre-Order Response Times (Rejected Query) (Avg Sec) EDI Total (PO-1D-2) (Diagnostic)

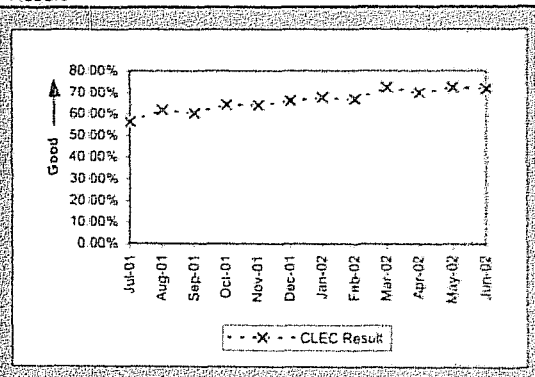
Date	CLEC Num	CLEC Denom	Response Time	Std Dev
Jul-01	19569.2	6989	2.80	5.57
Aug-01	21218.12	6889	3.08	8.92
Sep-01	16359.08	6788	2.41	4.27
Oct-01	15223.56	7284	2.09	2.40
Nov-01	13622	6811	2.00	1.21
Dec-01	13778.55	6855	2.01	2.46
Jan-02	14314.07	7193	1.99	2.06
Feb-02	14515.08	7482	1.94	2.01
Mar-02	17379.76	8198	2.12	2.51
Apr-02	16594.3	8215	2.02	1.59
May-02	16774.08	8304	2.02	1.44
Jun-02	21572.64	7596	2.84	6.77



Checklist #2 - Electronic Flow-through - Resale

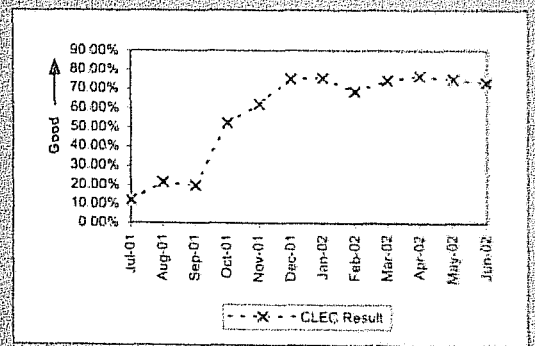
Percent Flow-through for All Eligible LSRs Received via IMA Resale Aggregate W/O UNE-P-POTS (Percent) (PO-2A-1) (Diagnostic)

	CLEC Num	CLEC Denom	CLEC Result	Std Dev
	19691	34945	56.35%	49.60%
	22002	35549	61.89%	48.57%
	14709	24372	60.35%	48.92%
	17977	27931	64.36%	47.89%
	14153	22057	64.17%	47.95%
	14972	22615	66.20%	47.30%
	20656	30535	67.75%	46.75%
	15843	23717	66.80%	47.09%
	19855	27487	72.38%	44.71%
	17848	25498	70.00%	45.83%
	20136	27852	72.30%	44.75%
	18052	25140	71.81%	44.99%



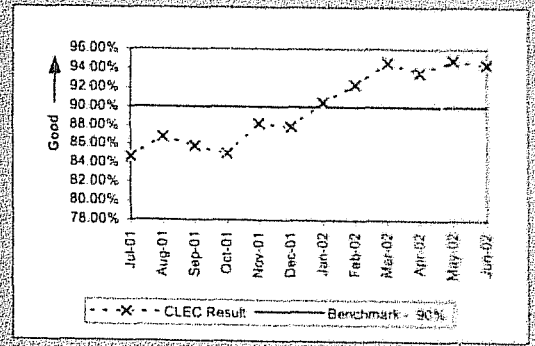
Percent Flow-through for All Eligible LSRs Received via EDI Resale Aggregate W/O UNE-P-POTS (Percent) (PO-2A-2) (Diagnostic)

	CLEC Num	CLEC Denom	CLEC Result	Std Dev
	1472	12078	12.19%	32.71%
	3757	17422	21.56%	41.13%
	2553	12969	19.69%	39.76%
	3142	6014	52.24%	49.95%
	5985	9673	61.87%	48.57%
	7710	10282	74.99%	43.31%
	9269	12306	75.32%	43.11%
	3811	5561	68.53%	46.44%
	3691	4976	74.18%	43.77%
	4750	6219	76.38%	42.48%
	3351	4486	74.70%	43.47%
	3512	4816	72.92%	44.44%



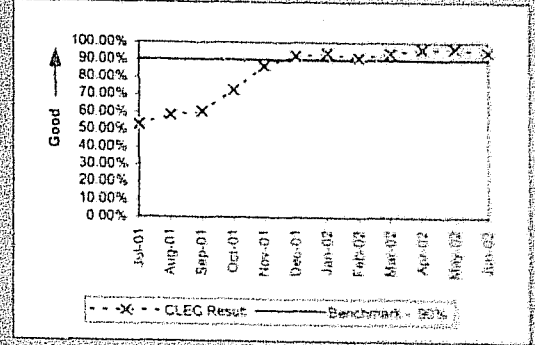
Percent Flow-through for All Eligible LSRs Received via IMA POTS Resale (Percent) (PO-2B-1) (Benchmark)

	CLEC Num	CLEC Denom	CLEC Result	Std Dev
	19691	23257	84.67%	36.03%
	22002	25347	86.80%	33.85%
	14709	17147	85.78%	34.92%
	17977	21143	85.03%	35.68%
	14153	16041	88.23%	32.23%
	14972	17030	87.92%	32.59%
	20656	22860	90.49%	29.34%
	15843	17156	92.35%	26.58%
	19855	21029	94.61%	22.59%
	17848	19065	93.62%	24.45%
	20136	21229	94.85%	22.10%
	18052	19123	94.39%	23.01%



Percent Flow-through for All Eligible LSRs Received via EDI POTS Resale (Percent) (PO-2B-2) (Benchmark)

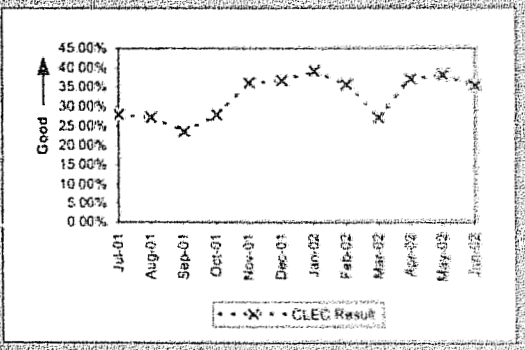
	CLEC Num	CLEC Denom	CLEC Result	Std Dev
	1472	2781	52.93%	49.91%
	3757	6414	58.58%	49.26%
	2553	4218	60.53%	48.88%
	3142	4327	72.61%	44.59%
	5985	6915	86.55%	34.12%
	7710	8345	92.39%	26.51%
	9269	9868	93.93%	23.88%
	3811	4174	91.30%	28.18%
	3691	3928	93.97%	23.81%
	4750	4937	96.21%	19.09%
	3351	3475	96.43%	18.55%
	3512	3712	94.61%	22.58%



Checklist #2 - Electronic Flow-through - Unbundled Loops

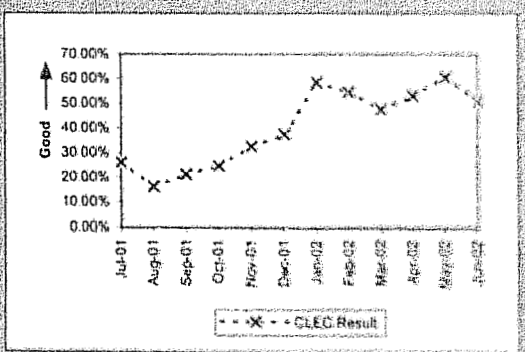
Electronic Flow-through for LSRs Received via IMA (Percent) (PO-2A-1) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	2841	10146	28.00%	44.90%
Aug-01	3061	11232	27.25%	44.53%
Sep-01	2633	11167	23.58%	42.45%
Oct-01	3335	11950	27.91%	44.85%
Nov-01	3806	10551	36.07%	48.02%
Dec-01	3392	9252	36.66%	48.19%
Jan-02	4290	10943	39.20%	48.82%
Feb-02	3467	9716	35.68%	47.91%
Mar-02	3334	12287	27.13%	44.47%
Apr-02	3517	9508	36.99%	48.28%
May-02	3679	9648	38.13%	48.57%
Jun-02	3081	8742	35.24%	47.77%



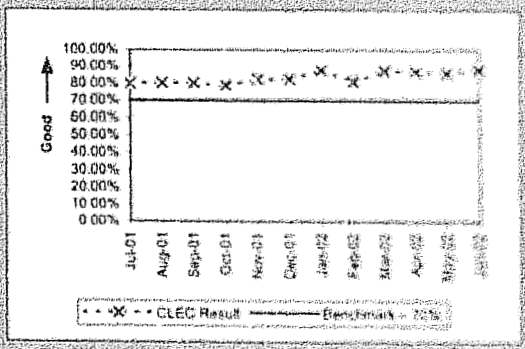
Electronic Flow-through for LSRs Received via EDI (Percent) (PO-2A-2) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	1995	7654	26.06%	43.90%
Aug-01	1395	8547	16.32%	36.96%
Sep-01	2149	10050	21.38%	41.00%
Oct-01	3336	13516	24.68%	43.12%
Nov-01	3920	11990	32.69%	46.91%
Dec-01	4303	11436	37.63%	48.44%
Jan-02	10195	17440	58.46%	49.28%
Feb-02	6101	11165	54.64%	49.78%
Mar-02	5578	11675	47.78%	49.95%
Apr-02	7791	14670	53.11%	49.90%
May-02	9505	15682	60.61%	48.86%
Jun-02	7186	14115	50.91%	49.99%



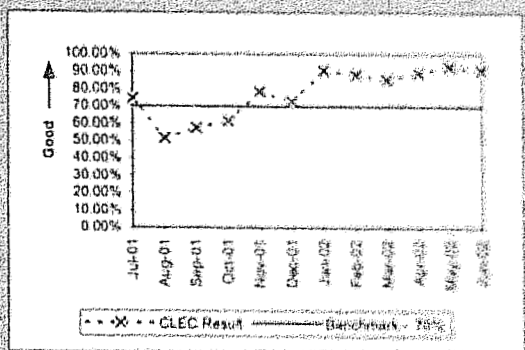
Electronic Flow-through for All Eligible LSRs Received via IMA (Percent) (PO-2B-1) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	2841	3544	80.16%	39.88%
Aug-01	3061	3802	80.51%	39.61%
Sep-01	2633	3274	80.42%	39.68%
Oct-01	3335	4222	78.99%	40.74%
Nov-01	3806	4595	82.83%	37.71%
Dec-01	3392	4098	82.77%	37.76%
Jan-02	4290	4874	88.02%	32.48%
Feb-02	3467	4258	81.42%	38.89%
Mar-02	3334	3804	87.64%	32.91%
Apr-02	3517	4030	87.27%	33.33%
May-02	3679	4258	86.40%	34.28%
Jun-02	3081	3479	88.56%	31.83%



Electronic Flow-through for All Eligible LSRs Received via EDI (Percent) (PO-2B-2) (Benchmark)

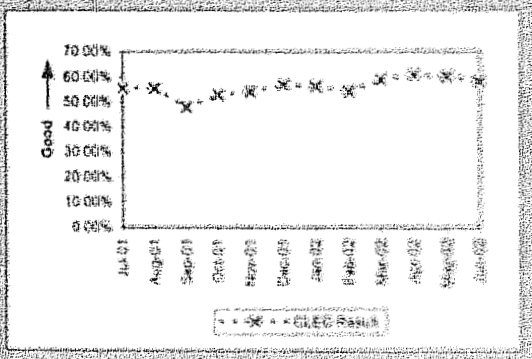
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	1995	2672	74.66%	43.49%
Aug-01	1395	2705	51.57%	49.98%
Sep-01	2149	3729	57.63%	49.41%
Oct-01	3336	5426	61.48%	48.66%
Nov-01	3920	4977	78.76%	40.90%
Dec-01	4303	5861	73.42%	44.18%
Jan-02	10195	11236	90.74%	28.99%
Feb-02	6101	6903	88.38%	32.04%
Mar-02	5578	6518	85.58%	35.13%
Apr-02	7791	8707	89.48%	30.68%
May-02	9505	10240	92.82%	25.81%
Jun-02	7186	7887	91.11%	28.46%



Checklist #2 - Electronic Flow-through - LNP

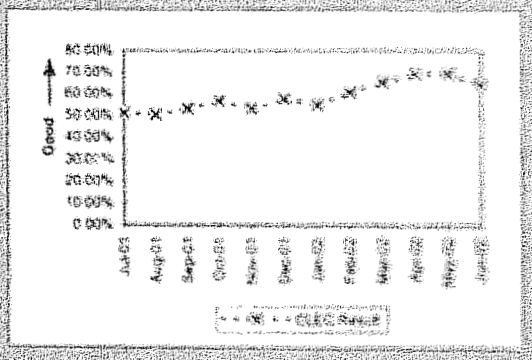
Electronic Flow-through for LSRs Received via IMA LNP (Percent) (PO-2A-1) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	6288	11300	55.65%	49.68%
Aug-01	7417	13349	55.56%	49.69%
Sep-01	5641	11746	48.02%	49.96%
Oct-01	8046	15183	52.99%	49.91%
Nov-01	8860	16370	54.12%	49.83%
Dec-01	9017	15822	56.99%	49.51%
Jan-02	10745	19095	56.27%	49.61%
Feb-02	7929	14602	54.30%	49.81%
Mar-02	8224	13958	58.92%	49.20%
Apr-02	8785	14446	60.81%	48.82%
May-02	7583	12608	60.14%	48.96%
Jun-02	6584	11316	58.18%	49.33%



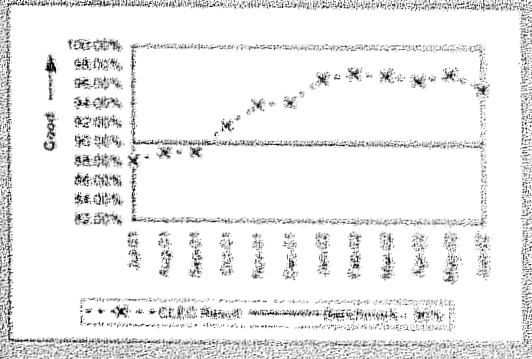
Electronic Flow-through for LSRs Received via EDI LNP (Percent) (PO-2A-2) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	5007	9777	51.21%	49.99%
Aug-01	4819	9552	50.45%	50.00%
Sep-01	4222	7942	53.16%	49.90%
Oct-01	6474	11417	56.70%	49.55%
Nov-01	6987	13123	53.24%	49.89%
Dec-01	9793	16964	57.73%	49.40%
Jan-02	8143	14779	55.10%	49.74%
Feb-02	8395	13813	60.78%	48.83%
Mar-02	9050	13811	65.53%	47.53%
Apr-02	10668	15353	69.48%	46.05%
May-02	12046	17321	69.55%	46.02%
Jun-02	10202	15814	64.51%	47.85%



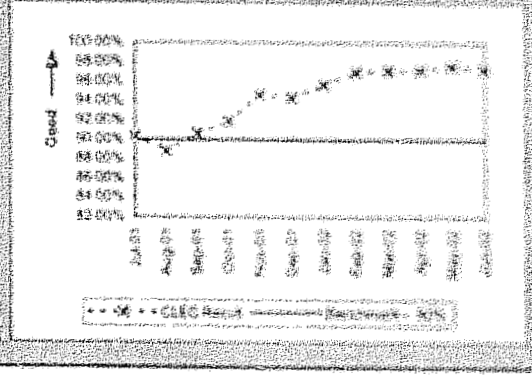
Electronic Flow-through for All Eligible LSRs Received via IMA LNP (Percent) (PO-2B-1) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	6288	7135	88.13%	32.34%
Aug-01	7417	8328	89.06%	31.21%
Sep-01	5641	6329	89.13%	31.13%
Oct-01	8046	8763	91.82%	27.41%
Nov-01	8860	9426	94.00%	23.76%
Dec-01	9017	9564	94.28%	23.22%
Jan-02	10745	11103	96.78%	17.66%
Feb-02	7929	8148	97.31%	16.17%
Mar-02	8224	8467	97.13%	16.70%
Apr-02	8785	9097	96.57%	18.20%
May-02	7583	7795	97.28%	16.27%
Jun-02	6584	6878	95.73%	20.23%



Electronic Flow-through for All Eligible LSRs Received via EDI LNP (Percent) (PO-2B-2) (Benchmark)

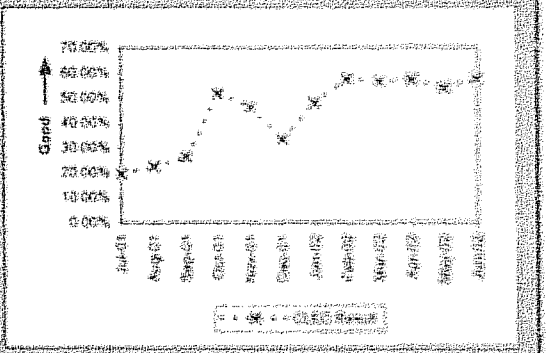
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	5007	5540	90.38%	29.49%
Aug-01	4819	5427	88.80%	31.54%
Sep-01	4222	4656	90.68%	29.07%
Oct-01	6474	7043	91.92%	27.25%
Nov-01	6987	7384	94.62%	22.56%
Dec-01	9793	10377	94.37%	23.05%
Jan-02	8143	8510	95.69%	20.31%
Feb-02	8395	8651	97.04%	16.95%
Mar-02	9050	9315	97.16%	16.63%
Apr-02	10668	10975	97.20%	16.49%
May-02	12046	12338	97.63%	15.20%
Jun-02	10202	10491	97.25%	16.37%



Checklist #2 - Electronic Flow-through - UNE-P-POTS

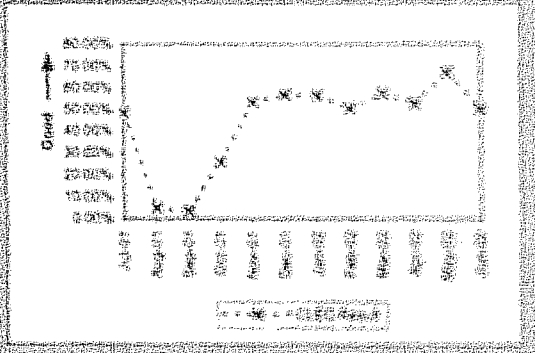
Electronic Flow-through for LSRs Received via IMA (Percent) (PO-2A-1) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	306	1560	19.62%	39.71%
Aug-01	402	1781	22.57%	41.81%
Sep-01	340	1285	26.46%	44.11%
Oct-01	3071	5933	51.76%	49.97%
Nov-01	3292	7095	46.40%	49.87%
Dec-01	2823	8438	33.46%	47.18%
Jan-02	3264	6792	48.06%	49.96%
Feb-02	4051	7056	57.41%	49.45%
Mar-02	3902	6896	56.58%	49.56%
Apr-02	4812	8418	57.16%	49.48%
May-02	5497	10173	54.04%	49.84%
Jun-02	5015	8694	57.68%	49.41%



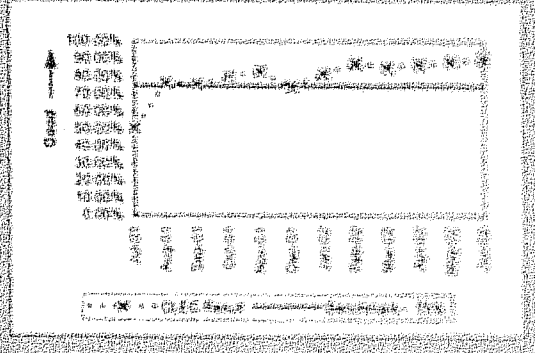
Electronic Flow-through for LSRs Received via EDI (Percent) (PO-2A-2) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	710	1458	48.70%	49.98%
Aug-01	76	1501	5.06%	21.92%
Sep-01	43	1230	3.50%	18.37%
Oct-01	798	3047	26.19%	43.97%
Nov-01	2059	3832	53.73%	49.86%
Dec-01	1539	2689	57.23%	49.47%
Jan-02	1947	3435	56.68%	49.55%
Feb-02	1566	3077	50.89%	49.99%
Mar-02	1604	2766	57.99%	49.36%
Apr-02	1947	3667	53.10%	49.90%
May-02	4046	6008	67.34%	46.90%
Jun-02	3263	6417	50.85%	49.99%



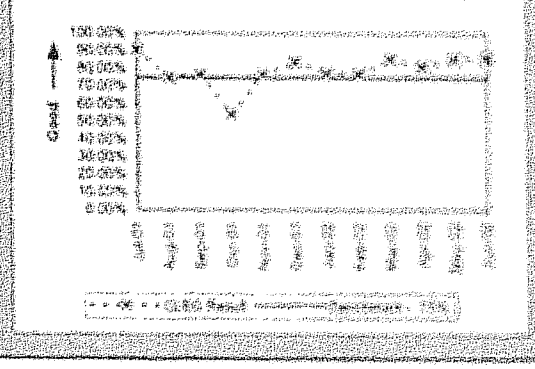
Electronic Flow-through for All Eligible LSRs Received via IMA (Percent) (PO-2B-1) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	306	598	51.17%	49.99%
Aug-01	402	522	77.01%	42.08%
Sep-01	340	447	76.06%	42.67%
Oct-01	3071	3819	80.41%	39.69%
Nov-01	3292	3943	83.49%	37.13%
Dec-01	2823	3778	74.72%	43.46%
Jan-02	3264	3988	81.85%	38.55%
Feb-02	4051	4614	87.80%	32.73%
Mar-02	3902	4553	85.70%	35.01%
Apr-02	4812	5524	87.11%	33.51%
May-02	5497	6191	88.79%	31.55%
Jun-02	5015	5552	90.33%	29.56%



Electronic Flow-through for All Eligible LSRs Received via EDI (Percent) (PO-2B-2) (Benchmark)

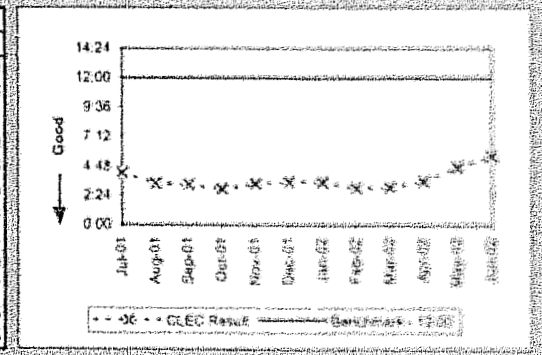
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01	710	782	90.79%	28.91%
Aug-01	76	101	75.25%	43.16%
Sep-01	43	56	76.79%	42.22%
Oct-01	798	1466	54.43%	49.80%
Nov-01	2059	2661	77.38%	41.84%
Dec-01	1539	1830	84.10%	36.57%
Jan-02	1947	2504	77.76%	41.59%
Feb-02	1566	2019	77.56%	41.72%
Mar-02	1604	1869	85.82%	34.88%
Apr-02	1947	2388	81.53%	38.80%
May-02	4046	4707	85.96%	34.74%
Jun-02	3263	3778	86.37%	34.31%



Checklist #2 - LSR Rejections

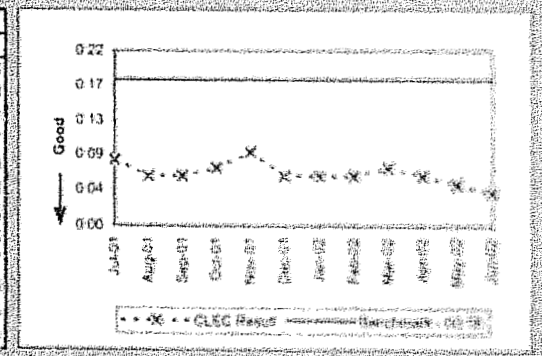
LSR Rejection Notice Interval for IMA - Rejected Manually (Hours:Minutes) (PO-3A-1) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	21270:09	4933	4:19
Aug-01	17728:10	5158	3:26
Sep-01	13786:10	4114	3:21
Oct-01	13659:29	4578	2:59
Nov-01	13840:21	4026	3:26
Dec-01	11824:06	3296	3:35
Jan-02	13053:43	3681	3:33
Feb-02	9649:34	3142	3:04
Mar-02	11300:27	3582	3:09
Apr-02	12303:58	3402	3:37
May-02	18427:51	3840	4:48
Jun-02	21451:51	3754	5:43



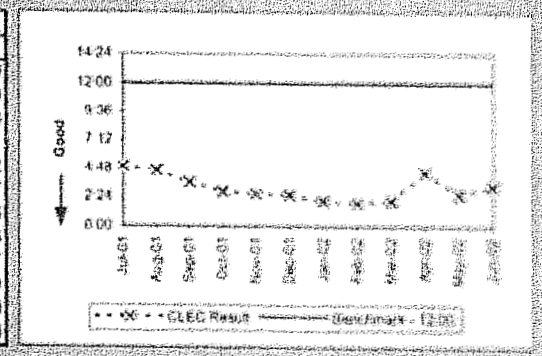
LSR Rejection Notice Interval for IMA - Auto-Rejected (Minutes:Seconds) (PO-3A-2) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	3187:14	25302	0:08
Aug-01	2619:12	24519	0:06
Sep-01	2182:39	20332	0:06
Oct-01	2821:41	25739	0:07
Nov-01	3749:08	24670	0:09
Dec-01	2975:07	28208	0:06
Jan-02	2952:50	29785	0:06
Feb-02	2612:21	25067	0:06
Mar-02	3208:27	28421	0:07
Apr-02	2740:31	28078	0:06
May-02	2415:14	29158	0:05
Jun-02	1868:07	26953	0:04



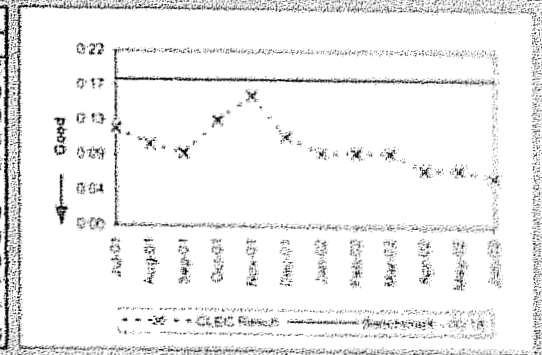
LSR Rejection Notice Interval for EDI - Rejected Manually (Hours:Minutes) (PO-3B-1) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	22614:02	4528	5:00
Aug-01	28904:49	6185	4:40
Sep-01	18780:11	5138	3:39
Oct-01	17800:55	6241	2:51
Nov-01	12279:16	4560	2:42
Dec-01	10284:53	3927	2:37
Jan-02	9422:58	4492	2:06
Feb-02	6870:16	3544	1:56
Mar-02	6348:06	2989	2:07
Apr-02	29633:56	6587	4:30
May-02	15097:37	5659	2:40
Jun-02	20524:07	6144	3:20



LSR Rejection Notice Interval for EDI - Auto-Rejected (Minutes:Seconds) (PO-3B-2) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	1517:44	7819	0:12
Aug-01	1657:46	10415	0:10
Sep-01	1419:33	9822	0:09
Oct-01	3215:15	14444	0:13
Nov-01	4041:55	14716	0:16
Dec-01	2841:34	15289	0:11
Jan-02	2863:00	20133	0:09
Feb-02	2013:05	13400	0:09
Mar-02	1994:26	13392	0:09
Apr-02	2018:25	17647	0:07
May-02	2013:47	16508	0:07
Jun-02	1721:16	18081	0:06



CONTINUATION

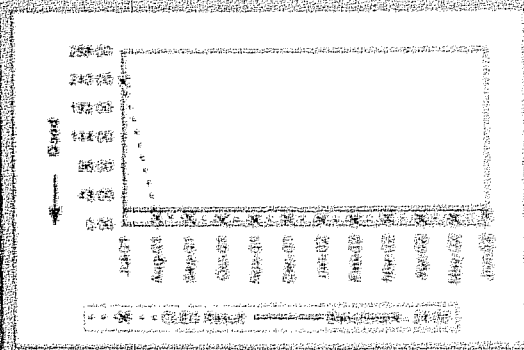
[4]

Scan ~ ~ # Pgs [ ]

Checklist #2 - LSR Rejections

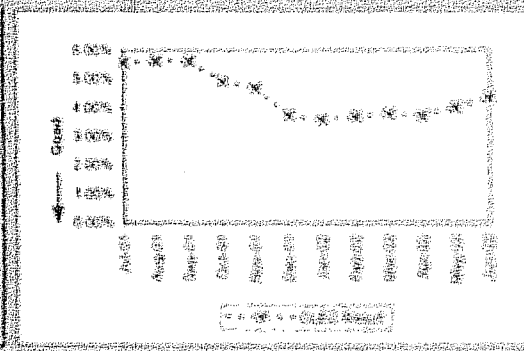
LSR Rejection Notice Interval for Manual and IIS (Hours:Minutes) (PO-3C) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	236524:33	995	237:43
Aug-01	18926:14	1449	13:04
Sep-01	8162:41	648	12:36
Oct-01	5273:53	677	7:47
Nov-01	5253:33	599	8:46
Dec-01	6682:15	652	10:15
Jan-02	4071:29	521	7:49
Feb-02	4787:34	584	8:12
Mar-02	5339:28	481	11:06
Apr-02	4242:26	402	10:33
May-02	5237:57	500	10:29
Jun-02	7605:31	554	13:44



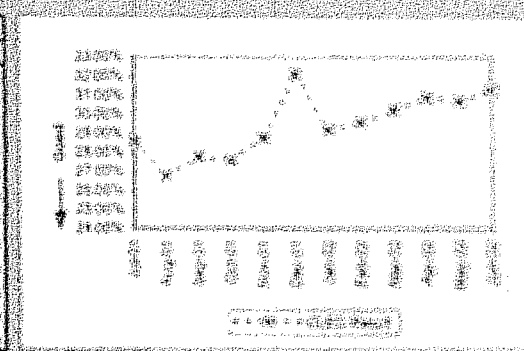
LSRs Rejected for IMA - Rejected Manually (Percent) (PO-4A-1) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	4933	88485	5.58%
Aug-01	5158	91530	5.64%
Sep-01	4114	73160	5.62%
Oct-01	4578	93217	4.91%
Nov-01	4026	85656	4.70%
Dec-01	3296	87829	3.75%
Jan-02	3681	102045	3.61%
Feb-02	3142	84615	3.71%
Mar-02	3582	94010	3.81%
Apr-02	3402	90804	3.75%
May-02	3840	94906	4.05%
Jun-02	3754	86121	4.36%



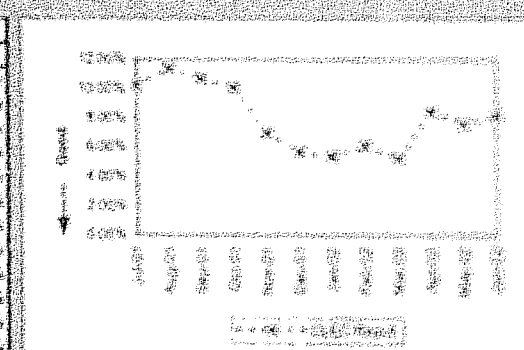
LSRs Rejected for IMA - Auto-Rejected (Percent) (PO-4A-2) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	25302	88485	28.59%
Aug-01	24519	91530	26.79%
Sep-01	20332	73160	27.79%
Oct-01	25739	93217	27.61%
Nov-01	24670	85656	28.80%
Dec-01	28208	87829	32.12%
Jan-02	29785	102045	29.19%
Feb-02	25067	84615	29.62%
Mar-02	28421	94010	30.23%
Apr-02	28078	90804	30.92%
May-02	29158	94906	30.72%
Jun-02	26953	86121	31.30%



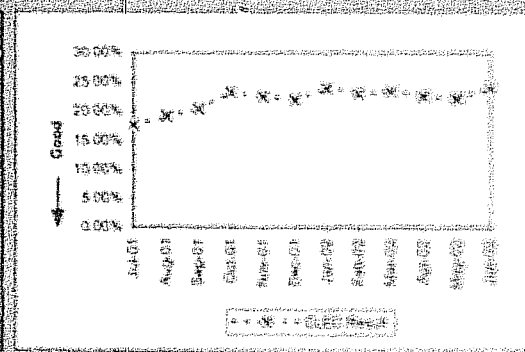
LSRs Rejected for EDI - Rejected Manually (Percent) (PO-4B-1) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	4528	44111	10.27%
Aug-01	6185	54234	11.40%
Sep-01	5138	47978	10.71%
Oct-01	6241	61930	10.08%
Nov-01	4560	65120	7.00%
Dec-01	3927	69357	5.66%
Jan-02	4492	83678	5.37%
Feb-02	3544	57897	6.12%
Mar-02	2989	57060	5.24%
Apr-02	6587	77654	8.48%
May-02	5659	74231	7.62%
Jun-02	6144	74983	8.19%

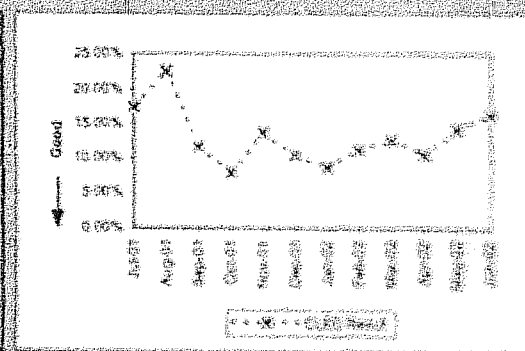


Checklist #2 - LSR Rejections

LSRs Rejected for EDI - Auto-Rejected (Percent) (PO-4B-2) (Diagnostic)			
Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	7819	44111	17.73%
Aug-01	10415	54234	19.20%
Sep-01	9822	47978	20.47%
Oct-01	14444	61930	23.32%
Nov-01	14716	65120	22.60%
Dec-01	15289	69357	22.04%
Jan-02	20133	83678	24.06%
Feb-02	13400	57897	23.14%
Mar-02	13392	57060	23.47%
Apr-02	17647	77654	22.73%
May-02	16508	74231	22.24%
Jun-02	18081	74983	24.11%



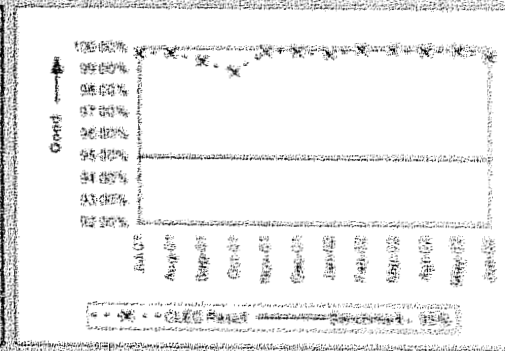
LSRs Received via Facsimile (Percent) (PO-4C) (Diagnostic)			
Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	995	5679	17.52%
Aug-01	1449	6399	22.64%
Sep-01	648	5514	11.75%
Oct-01	677	8574	7.90%
Nov-01	599	4332	13.83%
Dec-01	652	6223	10.48%
Jan-02	521	5963	8.74%
Feb-02	584	5174	11.29%
Mar-02	481	3753	12.82%
Apr-02	402	3788	10.61%
May-02	500	3496	14.30%
Jun-02	554	3382	16.38%



Checklist #2 - Firm Order Confirmations - Resale

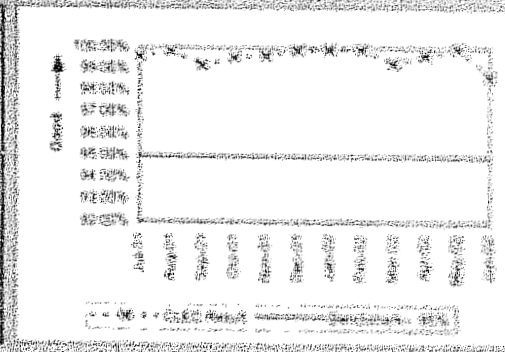
FOCs On Time for Fully Electronic LSRs Received Via IMA (Percent) (PO-5A-1(a)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	19953	19997	99.78%
Aug-01	22358	22404	99.79%
Sep-01	14910	14995	99.43%
Oct-01	20700	20926	98.92%
Nov-01	17371	17388	99.90%
Dec-01	17595	17615	99.89%
Jan-02	23222	23271	99.79%
Feb-02	19567	19570	99.98%
Mar-02	23494	23498	99.98%
Apr-02	22335	22352	99.92%
May-02	25276	25286	99.96%
Jun-02	22666	22746	99.65%



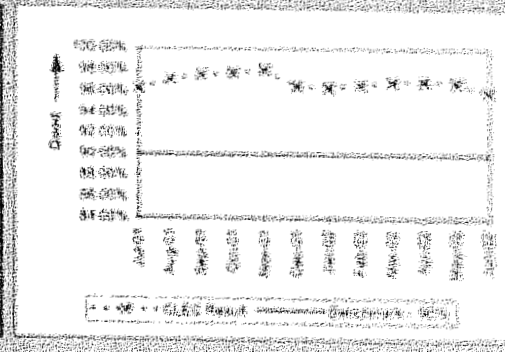
FOCs On Time for Fully Electronic LSRs Received Via EDI (Percent) (PO-5A-2(a)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	2174	2182	99.63%
Aug-01	3828	3833	99.87%
Sep-01	2575	2596	99.19%
Oct-01	3908	3925	99.57%
Nov-01	7998	8026	99.65%
Dec-01	9211	9220	99.90%
Jan-02	11145	11152	99.94%
Feb-02	5341	5344	99.94%
Mar-02	5222	5260	99.28%
Apr-02	6612	6634	99.67%
May-02	7347	7348	99.99%
Jun-02	6644	6732	98.69%



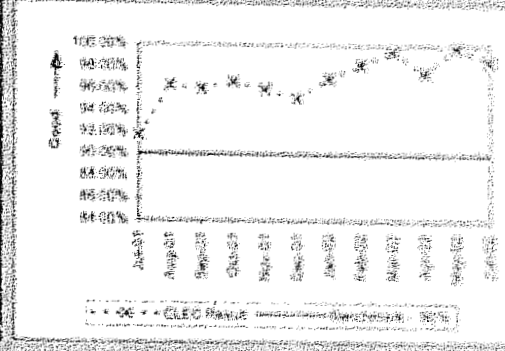
FOCs On Time For Electronic/Manual LSRs Received Via IMA (Percent) (PO-5B-1(a)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	15449	16038	96.33%
Aug-01	14005	14409	97.20%
Sep-01	9658	9894	97.61%
Oct-01	12165	12441	97.78%
Nov-01	11068	11286	98.07%
Dec-01	11719	12136	96.56%
Jan-02	12703	13172	96.44%
Feb-02	10568	10932	96.67%
Mar-02	9989	10301	96.97%
Apr-02	10711	11037	97.05%
May-02	11855	12235	96.89%
Jun-02	10299	10722	96.05%



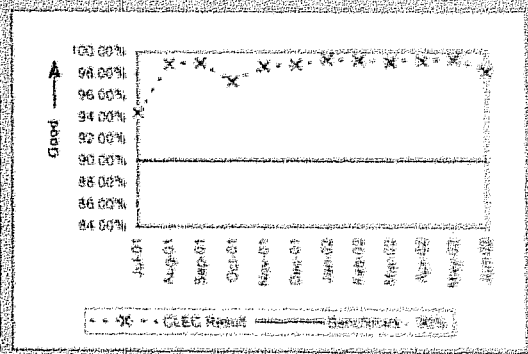
FOCs On Time For Electronic/Manual LSRs Received Via EDI (Percent) (PO-5B-2(a)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	10308	11234	91.76%
Aug-01	14310	14849	96.37%
Sep-01	10831	11279	96.03%
Oct-01	11018	11395	96.69%
Nov-01	10582	11024	95.99%
Dec-01	9428	9901	95.22%
Jan-02	11701	12060	97.02%
Feb-02	7793	7931	98.26%
Mar-02	7311	7352	99.44%
Apr-02	13641	13992	97.49%
May-02	9062	9076	99.85%
Jun-02	11234	11391	98.62%



Checklist #2 - Firm Order Confirmations - Resale

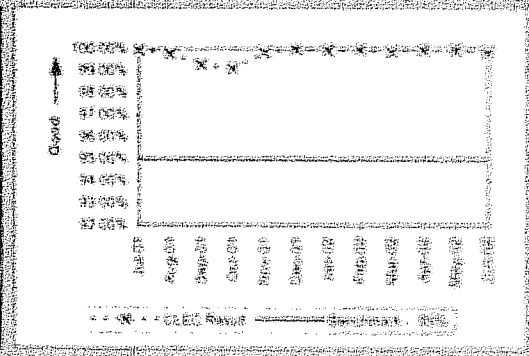
FOCs on Time for Manual (Percent) (PO-5C-(a)) (Benchmark)			
Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	4002	4238	94.43%
Aug-01	4336	4364	98.91%
Sep-01	4211	4253	99.01%
Oct-01	6741	6927	97.31%
Nov-01	3271	3314	98.70%
Dec-01	4966	5026	98.81%
Jan-02	4896	4929	99.33%
Feb-02	4100	4132	99.23%
Mar-02	2670	2695	99.07%
Apr-02	2688	2710	99.19%
May-02	2098	2113	99.29%
Jun-02	2140	2179	98.21%



Checklist #2 - Firm Order Confirmations - Unbundled Loops

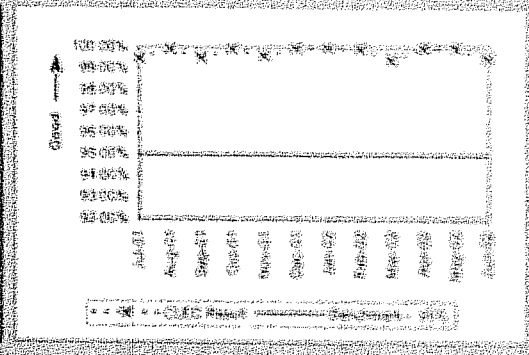
FOCs On Time for Fully Electronic LSRs Received Via IMA (Percent) (PO-5A-1(b)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	2840	2841	99.96%
Aug-01	3055	3061	99.80%
Sep-01	2592	2610	99.31%
Oct-01	3286	3315	99.13%
Nov-01	3777	3782	99.87%
Dec-01	3364	3364	100.00%
Jan-02	4215	4216	99.98%
Feb-02	3416	3416	100.00%
Mar-02	3148	3151	99.90%
Apr-02	3231	3232	99.97%
May-02	3388	3389	99.97%
Jun-02	2831	2835	99.86%



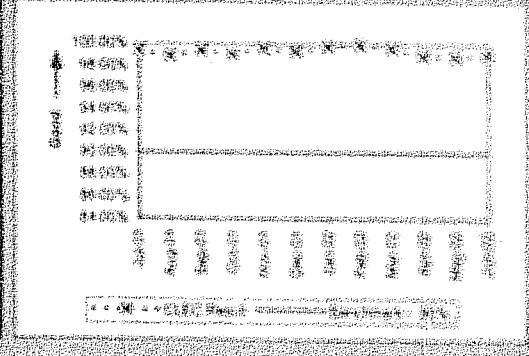
FOCs On Time for Fully Electronic LSRs Received Via EDI (Percent) (PO-5A-2(b)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	1985	1995	99.50%
Aug-01	1394	1395	99.93%
Sep-01	2135	2145	99.53%
Oct-01	3321	3323	99.94%
Nov-01	3815	3829	99.63%
Dec-01	4219	4220	99.98%
Jan-02	9511	9511	100.00%
Feb-02	5282	5284	99.96%
Mar-02	4711	4738	99.43%
Apr-02	7104	7105	99.99%
May-02	8705	8706	99.99%
Jun-02	6461	6492	99.52%



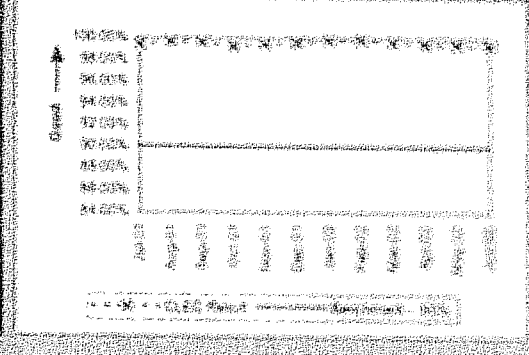
FOCs On Time For Electronic/Manual LSRs Received Via IMA (Percent) (PO-5B-1(b)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	7176	7216	99.45%
Aug-01	7087	7162	98.95%
Sep-01	7454	7497	99.43%
Oct-01	8842	8923	99.09%
Nov-01	7004	7027	99.67%
Dec-01	5808	5846	99.35%
Jan-02	6454	6465	99.83%
Feb-02	6143	6146	99.95%
Mar-02	8742	8768	99.70%
Apr-02	5844	5904	98.98%
May-02	5866	5930	98.92%
Jun-02	5438	5487	99.11%



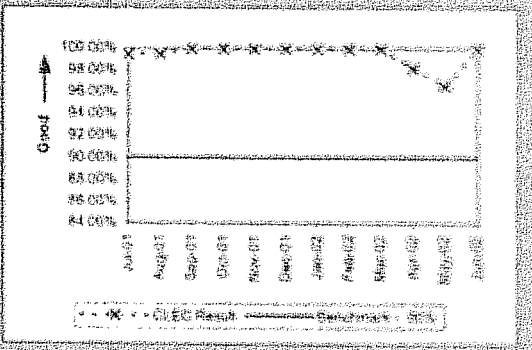
FOCs On Time For Electronic/Manual LSRs Received Via EDI (Percent) (PO-5B-2(b)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	4426	4453	99.39%
Aug-01	5242	5259	99.68%
Sep-01	7076	7098	99.69%
Oct-01	9085	9150	99.29%
Nov-01	8708	8752	99.50%
Dec-01	8559	8586	99.69%
Jan-02	10137	10152	99.85%
Feb-02	7418	7427	99.88%
Mar-02	8357	8380	99.73%
Apr-02	9077	9119	99.54%
May-02	8406	8450	99.48%
Jun-02	9025	9080	99.39%



Checklist #2 - Firm Order Confirmations - Unbundled Loops

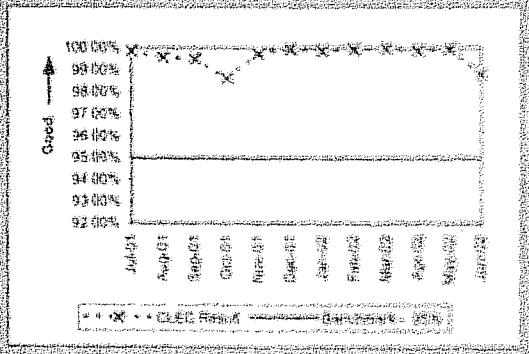
FOCs on Time for Manual (Percent) (PD-5C-(b)) (Benchmark)			
Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	182	183	99.45%
Aug-01	205	206	99.51%
Sep-01	180	180	100.00%
Oct-01	278	278	100.00%
Nov-01	172	172	100.00%
Dec-01	241	241	100.00%
Jan-02	226	226	100.00%
Feb-02	172	172	100.00%
Mar-02	173	173	100.00%
Apr-02	275	280	98.21%
May-02	258	267	96.63%
Jun-02	189	189	100.00%



Checklist #2 - Firm Order Confirmations - LNP

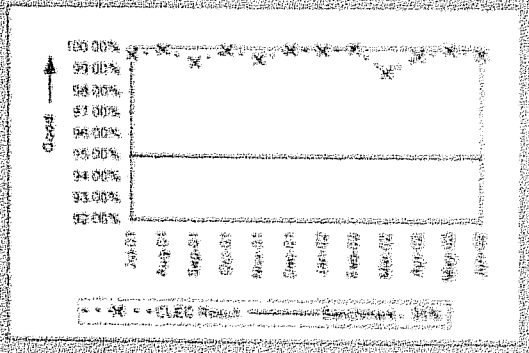
FOCs On Time for Fully Electronic LSRs Received Via IMA (Percent) (PO-5A-1(c)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	6280	6288	99.87%
Aug-01	7387	7417	99.60%
Sep-01	5453	5479	99.53%
Oct-01	7655	7757	98.69%
Nov-01	8538	8558	99.77%
Dec-01	8724	8725	99.99%
Jan-02	10395	10406	99.89%
Feb-02	7643	7646	99.96%
Mar-02	7667	7668	99.99%
Apr-02	8012	8020	99.90%
May-02	6887	6888	99.99%
Jun-02	5838	5906	98.85%



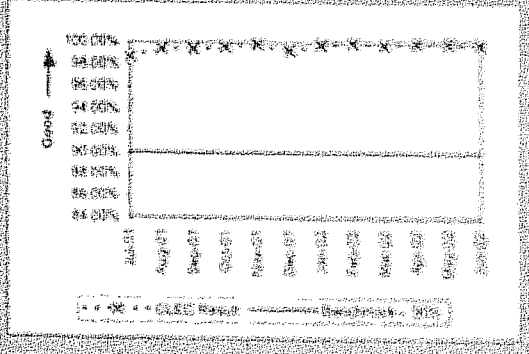
FOCs On Time for Fully Electronic LSRs Received Via EDI (Percent) (PO-5A-2(c)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	4991	5007	99.68%
Aug-01	4815	4819	99.92%
Sep-01	4187	4213	99.38%
Oct-01	6267	6272	99.92%
Nov-01	6751	6784	99.51%
Dec-01	9501	9506	99.95%
Jan-02	7601	7606	99.93%
Feb-02	7911	7911	100.00%
Mar-02	8206	8294	98.94%
Apr-02	9715	9746	99.68%
May-02	10449	10455	99.94%
Jun-02	8807	8831	99.73%



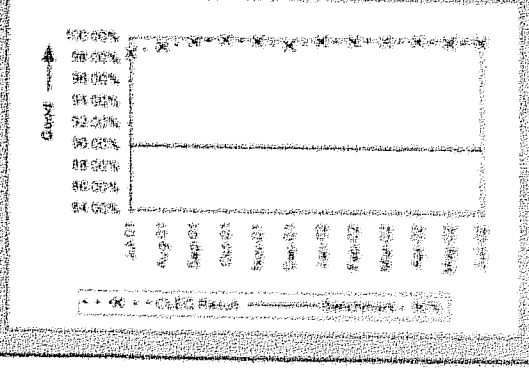
FOCs On Time For Electronic/Manual LSRs Received Via IMA (Percent) (PO-5B-1(c)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	4633	4695	98.68%
Aug-01	5290	5322	99.40%
Sep-01	4274	4299	99.42%
Oct-01	5332	5351	99.64%
Nov-01	5908	5915	99.88%
Dec-01	5418	5457	99.29%
Jan-02	6942	6956	99.80%
Feb-02	5537	5540	99.95%
Mar-02	5115	5123	99.84%
Apr-02	5121	5122	99.98%
May-02	4457	4459	99.96%
Jun-02	4205	4212	99.83%



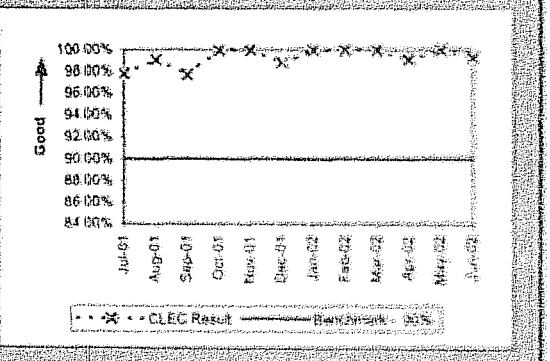
FOCs On Time For Electronic/Manual LSRs Received Via EDI (Percent) (PO-5B-2(c)) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	4687	4752	98.63%
Aug-01	4498	4533	99.23%
Sep-01	3589	3598	99.75%
Oct-01	4322	4325	99.93%
Nov-01	4741	4749	99.83%
Dec-01	5418	5448	99.45%
Jan-02	5088	5093	99.90%
Feb-02	4282	4286	99.91%
Mar-02	3959	3960	99.97%
Apr-02	3926	3926	100.00%
May-02	4633	4638	99.89%
Jun-02	5100	5104	99.92%



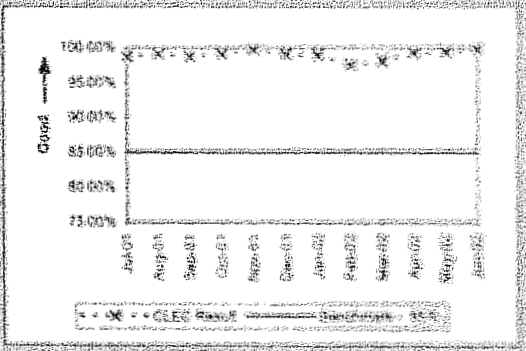
Checklist #2 - Firm Order Confirmations - LNP

FOCs on Time for Manual (Percent) (PO-5C-(c)) (Benchmark)			
Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	135	138	97.83%
Aug-01	224	226	99.12%
Sep-01	129	132	97.73%
Oct-01	108	108	100.00%
Nov-01	111	111	100.00%
Dec-01	173	175	98.86%
Jan-02	130	130	100.00%
Feb-02	130	130	100.00%
Mar-02	237	237	100.00%
Apr-02	232	234	99.15%
May-02	253	253	100.00%
Jun-02	287	289	99.31%



Checklist #2 - Firm Order Confirmations - US

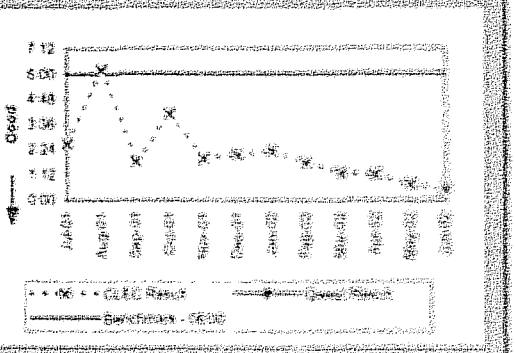
Firm Order Confirmations (FOCs) On Time (Percent) (PO-5D) (Benchmark)			
Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	479	485	98.76%
Aug-01	594	599	99.17%
Sep-01	402	407	98.77%
Oct-01	561	566	99.12%
Nov-01	482	483	99.79%
Dec-01	433	437	99.08%
Jan-02	461	466	98.93%
Feb-02	518	531	97.55%
Mar-02	621	633	98.10%
Apr-02	553	557	99.28%
May-02	514	517	99.42%
Jun-02	411	412	99.76%



Checklist #2 - Completion Notifications

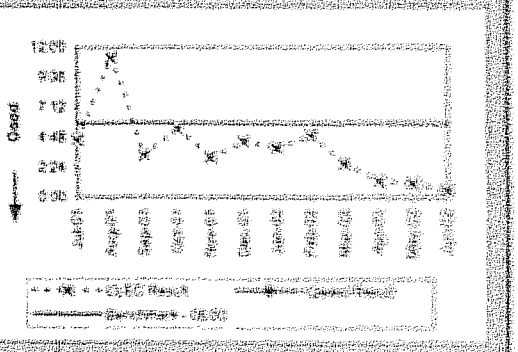
Work Completion Notification Timeliness (Hours:Minutes) (PO-6A) (Benchmark)

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	118480:43	44181	2:41	6:03					
Aug-01	336888:56	54303	6:12	40:46					
Sep-01	75332:34	41036	1:51	17:23					
Oct-01	212078:19	51945	4:06	22:02					
Nov-01	95564:58	47982	2:00	27:45					
Dec-01	104720:00	45162	2:11	18:37					
Jan-02	128026:24	54080	2:22	21:02					
Feb-02	90524:19	50025	1:49	17:48					
Mar-02	70460:48	53746	1:19	19:21					
Apr-02	62893:45	50415	1:15	15:28					
May-02	40550:02	52865	0:46	9:25					
Jun-02	25487:25	46469	0:33	7:10					



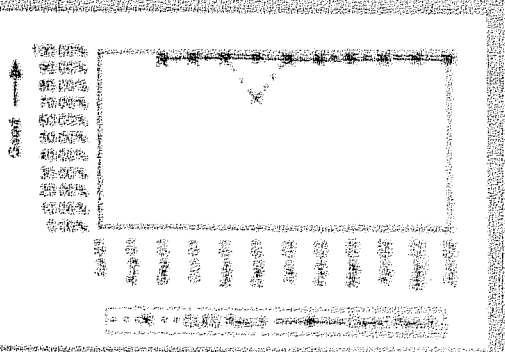
Work Completion Notification Timeliness (Hours:Minutes) (PO-6B) (Benchmark)

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	98504:55	21078	4:40	17:55					
Aug-01	362869:32	32441	11:11	52:44					
Sep-01	78720:20	23114	3:26	23:40					
Oct-01	73682:13	13264	5:36	28:46					
Nov-01	114220:21	35190	3:16	34:32					
Dec-01	185548:35	40628	4:34	35:56					
Jan-02	189134:31	46636	4:04	40:43					
Feb-02	166988:54	32929	5:04	51:41					
Mar-02	85117:17	31157	2:46	32:24					
Apr-02	53837:46	40598	1:20	16:19					
May-02	44688:25	39451	1:08	10:05					
Jun-02	26528:30	40355	0:39	5:57					



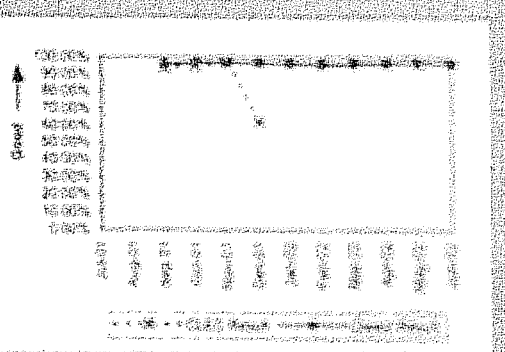
Billing Completion Notification Timeliness (Percent) (PO-7A,C) (Parity)

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01	38491	40547	94.93%	21.94%	2015375	2096536	96.13%	12.4	6.54
Oct-01	46311	48178	96.12%	19.30%	2115176	2178305	97.10%	12.65	6.69
Nov-01	44225	46046	96.05%	19.49%	2382740	2445477	97.43%	18.68	10.06
Dec-01	46220	62421	74.05%	43.84%	2171317	2233267	97.23%	347.62	210.49
Jan-02	55909	57798	96.73%	17.70%	2604737	2694688	96.66%	-0.92	-0.56
Feb-02	52222	53371	97.85%	14.51%	2160754	2244677	96.26%	-19.09	-12.6
Mar-02	59412	60521	98.17%	13.41%	2225036	2304001	96.57%	-27.29	-19.94
Apr-02	51018	52189	97.76%	14.81%	2318361	2392773	96.89%	-11.28	-7.85
May-02	54777	56032	97.76%	14.80%	2338350	2403632	97.28%	-6.85	-5.17
Jun-02	51772	53168	97.37%	15.99%	2101184	2166147	97.00%	-4.99	-4.03



Billing Completion Notification Timeliness (Percent) (PO-7B,C) (Parity)

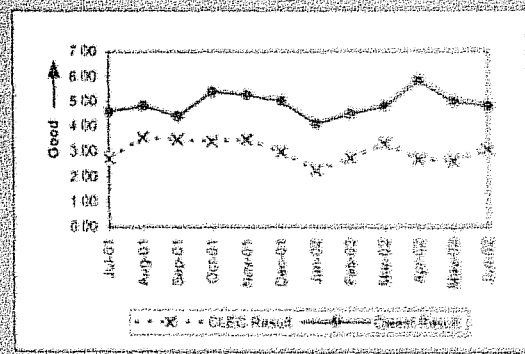
Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01	28677	28270	94.35%	23.10%	2015375	2096536	96.13%	19.45	8.39
Oct-01	12993	13671	95.04%	21.71%	2115176	2178305	97.10%	14.32	7.71
Nov-01	35683	36580	97.55%	15.47%	2382740	2445477	97.43%	-1.36	-1.83
Dec-01	49202	78064	63.03%	48.27%	2171317	2233267	97.23%	571.91	348.3
Jan-02					2604737	2694688	96.66%		
Feb-02					2160754	2244677	96.26%		
Mar-02					2225036	2304001	96.57%		
Apr-02					2318361	2392773	96.89%		
May-02					2338350	2403632	97.28%		
Jun-02					2101184	2166147	97.00%		



Checklist #2 - Jeopardy Notifications - Non-Designed Services

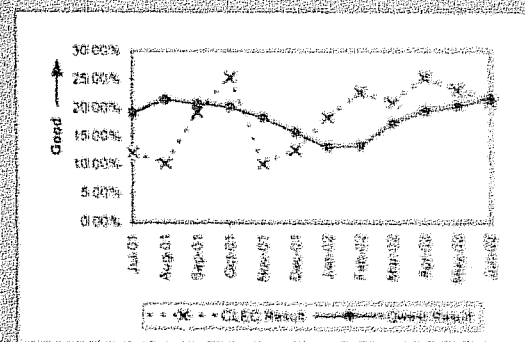
Jeopardy Notice Interval (Average Days) (PO-8A) (Parity)

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	210	77	2.73	2.50	26933	5874	4.59	3.72	1.26
Aug-01	323	91	3.55	4.13	33967	7058	4.81	3.72	1.26
Sep-01	355	102	3.48	3.59	26437	6015	4.40	1.3	-0.21
Oct-01	441	130	3.39	3.64	36818	6842	5.38	0.29	-0.42
Nov-01	288	83	3.47	5.13	29680	5641	5.26	3.72	1.26
Dec-01	256	86	2.98	5.08	26374	5273	5.00	3.09	0.88
Jan-02	204	90	2.27	1.69	22743	5527	4.11	3.09	0.88
Feb-02	172	63	2.73	2.57	22052	4919	4.48	2.65	0.61
Mar-02	189	57	3.32	4.21	24806	5173	4.80	1.72	0.04
Apr-02	176	65	2.67	2.46	31864	5474	5.82	2.75	0.67
May-02	192	73	2.63	1.50	28171	5645	4.99	3.72	1.26
Jun-02	226	74	3.05	3.16	27492	5725	4.80	2.65	0.61



Timely Jeopardy Notices (Percent) (PO-9A) (Parity)

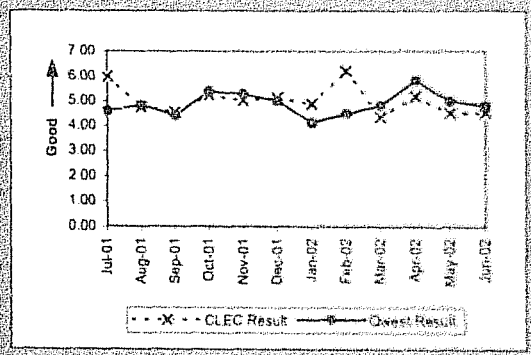
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	24	195	12.31%	32.85%	2135	11120	19.20%	2.53	0.54
Aug-01	26	253	10.28%	30.37%	2459	11402	21.57%	4.67	1.84
Sep-01	25	129	19.38%	39.53%	1916	9193	20.84%	0.39	-0.76
Oct-01	34	134	25.37%	43.51%	1984	9798	20.25%	-1.47	-1.89
Nov-01	15	146	10.27%	30.36%	1445	7884	18.33%	2.64	0.63
Dec-01	21	166	12.65%	33.24%	1546	9817	15.75%	1.09	-0.34
Jan-02	26	141	18.44%	38.78%	1438	10920	13.17%	-1.84	-2.12
Feb-02	21	92	22.83%	41.97%	1318	9814	13.43%	-2.63	-2.6
Mar-02	17	81	20.99%	40.72%	1438	8258	17.41%	-0.84	-1.51
Apr-02	18	71	25.35%	43.50%	1473	7526	19.57%	-1.22	-1.74
May-02	20	86	23.26%	42.25%	1463	7259	20.43%	-0.65	-1.39
Jun-02	19	90	21.11%	40.81%	1497	6907	21.67%	0.1	-0.54



Checklist #2 - Jeopardy Notifications - Unbundled Loops

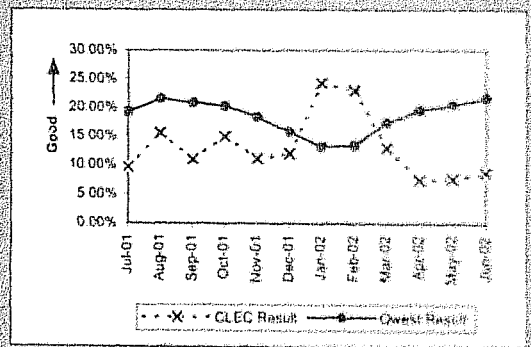
Jeopardy Notice Interval (Average Days) (PO-8B) (Parity)

Date	CLEC Num	CLEC Den	CLEC Res	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	1545	258	5.97	5.73	26933	5874	4.59	-2.48	-2.51
Aug-01	1958	412	4.75	3.86	33967	7058	4.81	0.14	-0.91
Sep-01	1940	427	4.54	3.21	26437	6015	4.40	-0.42	-1.26
Oct-01	3876	739	5.24	3.85	36818	6842	5.38	0.05	-0.97
Nov-01	2316	462	5.01	4.71	29680	5641	5.26	0.6	-0.63
Dec-01	2442	476	5.13	5.12	26374	5273	5.00	-0.33	-1.2
Jan-02	3175	649	4.89	9.52	22743	5527	4.11	-2.35	-2.43
Feb-02	3571	575	6.22	32.53	22052	4919	4.48	-4.56	-3.77
Mar-02	1535	353	4.35	2.47	24806	5173	4.80	0.79	-0.52
Apr-02	1734	334	5.19	5.06	31864	5474	5.82	0.13	-0.92
May-02	1277	284	4.50	4.34	28171	5645	4.99	0.96	-0.42
Jun-02	1132	251	4.51	2.77	27492	5725	4.80	0.64	-0.61



Timely Jeopardy Notices (Percent) (PO-9B) (Parity)

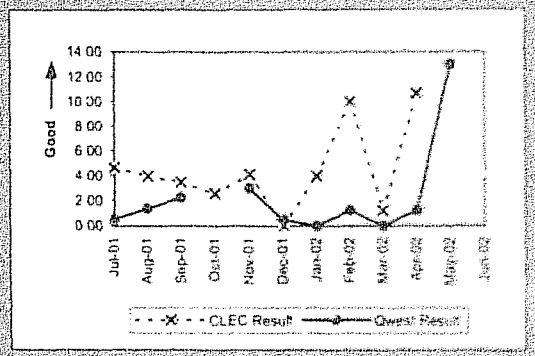
Date	CLEC Num	CLEC Den	CLEC Res	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	69	711	9.70%	29.60%	2135	11120	19.20%	6.23	2.79
Aug-01	141	909	15.51%	36.20%	2459	11402	21.57%	4.27	1.6
Sep-01	112	1017	11.01%	31.30%	1916	9193	20.84%	7.32	3.45
Oct-01	209	1398	14.95%	35.66%	1984	9798	20.25%	4.61	1.8
Nov-01	137	1232	11.12%	31.44%	1445	7884	18.33%	6.08	2.7
Dec-01	170	1418	11.99%	32.48%	1546	9817	15.75%	3.63	1.21
Jan-02	246	1008	24.38%	42.94%	1438	10920	13.17%	-10.08	-7.13
Feb-02	204	885	23.05%	42.12%	1318	9814	13.43%	-8.04	-5.89
Mar-02	179	918	12.99%	33.62%	1438	8258	17.41%	3.35	1.04
Apr-02	86	1146	7.50%	26.35%	1473	7526	19.57%	9.59	4.83
May-02	76	995	7.64%	26.56%	1483	7259	20.43%	9.39	4.71
Jun-02	60	706	8.76%	28.27%	1497	6907	21.67%	7.94	3.83



Checklist #2 - Jeopardy Notifications - LIS

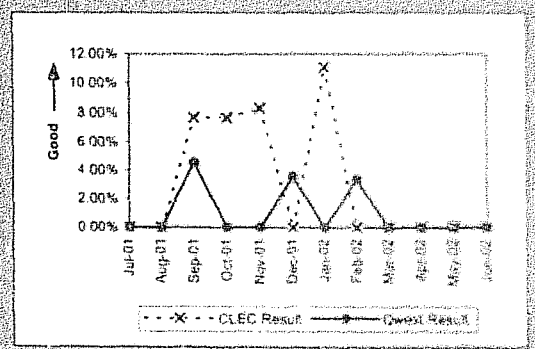
Jeopardy Notice Interval (Average Days) (PO-8C) (Parity)

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
[illegible]	28	6	4 67	7 47	1	2	0 50	-7 22	-5 39
[illegible]	8	2	4 00	5 66	7	5	1 40	-1 59	-1 97
[illegible]	14	4	3 50	4 36	18	8	2 25	-0 47	-1 29
[illegible]	13	5	2 60	3 58					
[illegible]	33	8	4 12	5 94	3	1	3 00		
[illegible]	0	1	0 00		1	2	0 50	-3 72	-3 26
[illegible]	8	2	4 00	4 24	0	4	0 00		
[illegible]	20	2	10 00	14 14	5	4	1 25	-4 04	-3 46
[illegible]	5	4	1 25	2 50	0	1	0 00		
[illegible]	101	10	10 70	3 97	11	9	1 22	-5 63	-4 42
[illegible]					13	1	13 00		
[illegible]									



Timely Jeopardy Notices (Percent) (PO-9C) (Parity)

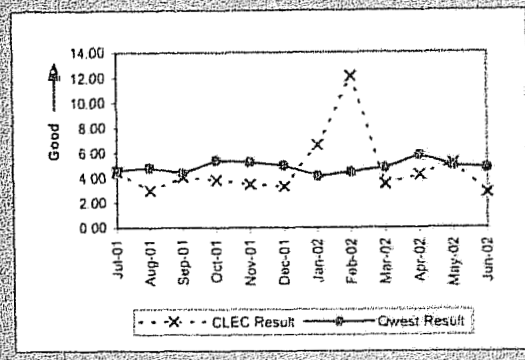
Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
[illegible]	0	23	0 00%	0 00%	0	31	0 00%	N/A	N/A
[illegible]	0	7	0 00%	0 00%	0	39	0 00%	N/A	N/A
[illegible]	1	13	7 69%	26 65%	1	22	4 55%	-0 43	-1 26
[illegible]	1	13	7 69%	26 65%	0	28	0 00%	N/A	
[illegible]	1	12	8 33%	27 64%	0	57	0 00%	N/A	
[illegible]	0	5	0 00%	0 00%	1	28	3 57%	0 01	-0 99
[illegible]	1	9	11 11%	31 43%	0	27	0 00%	N/A	
[illegible]	0	19	0 00%	0 00%	1	30	3 33%	0 47	-0 71
[illegible]	0	16	0 00%	0 00%	0	10	0 00%	N/A	N/A
[illegible]	0	6	0 00%	0 00%	0	21	0 00%	N/A	N/A
[illegible]	0	17	0 00%	0 00%	0	24	0 00%	N/A	N/A
[illegible]	0	6	0 00%	0 00%	0	39	0 00%	N/A	N/A



Checklist #2 - Jeopardy Notifications - UNE-P-POTS

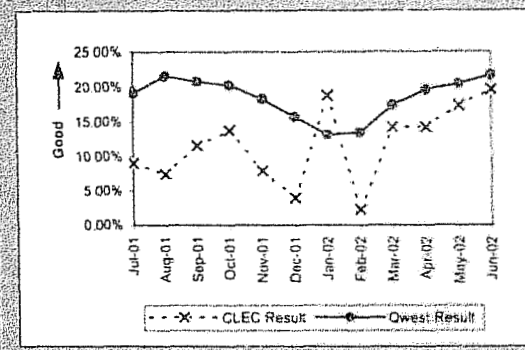
Jeopardy Notice Interval (Average Days) (PO-8D) (Parity)

			CLEC Result	CLEC Std D	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
			4.53	5.79	26933	5874	4.59	-2.12	-2.29
			3.60	4.43	33967	7058	4.81	3.72	1.26
			4.69	5.11	26437	6015	4.40	3.72	1.26
			3.84	4.90	36818	6842	5.38	3.72	1.26
			3.50	3.97	29680	5641	5.26	3.72	1.26
			3.52	3.97	26374	5273	5.00	1.14	-0.31
			6.64	8.18	22743	5527	4.11	-1.97	-2.2
			12.14	40.42	22652	4919	4.48	-4.75	-3.89
			3.52	3.16	24806	5173	4.80	0.82	-0.5
			4.25	6.70	31864	5474	5.82	0.26	-0.84
			5.18	6.41	28171	5645	4.99	-0.12	-1.07
			2.64	3.57	27492	5725	4.80	2.2	0.34



Timely Jeopardy Notices (Percent) (PO-9D) (Parity)

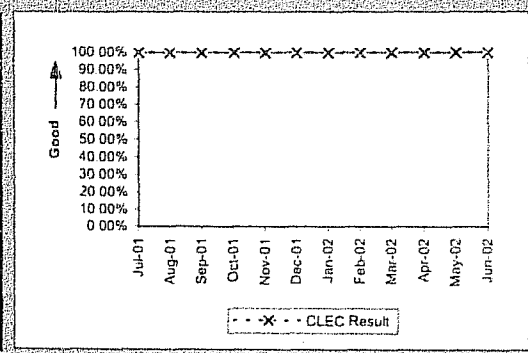
			CLEC Result	CLEC Std D	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
			9.09%	28.75%	2135	11120	19.20%	2.88	0.75
			7.48%	26.30%	2459	11402	21.57%	3.91	1.37
			11.59%	32.02%	1916	9193	20.84%	1.97	0.2
			10.79%	31.48%	1984	9798	20.25%	1.23	-0.25
			7.94%	27.03%	1445	7884	18.33%	2.28	0.38
			4.00%	19.60%	1546	9817	15.75%	2.53	0.54
			18.84%	39.10%	1438	10920	13.17%	-1.39	-1.84
			2.33%	15.07%	1318	9814	13.43%	2.4	0.46
			14.29%	34.99%	1438	8258	17.41%	0.49	-0.7
			14.29%	34.99%	1473	7526	19.57%	0.92	-0.44
			17.39%	37.90%	1483	7259	20.43%	0.48	-0.71
			39.70%	49.77%	1497	6907	21.67%	0.36	-0.78



Checklist #2 - LSR Accountability

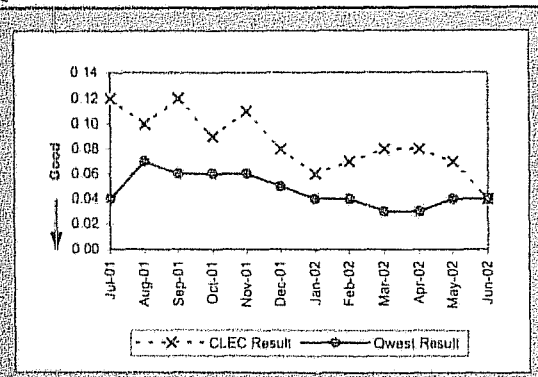
LSR Accountability (Percent) (PO-10) (Diagnostic)

[illegible]	CLEC Denom	CLEC Result
73119	73119	100.00%
84030	84030	100.00%
65983	65983	100.00%
85412	85412	100.00%
81566	81566	100.00%
83868	83868	100.00%
96534	96534	100.00%
75655	75655	100.00%
82525	82525	100.00%
86473	86473	100.00%
91474	91474	100.00%
80035	80035	100.00%



Checklist #2 - Due Date Changes

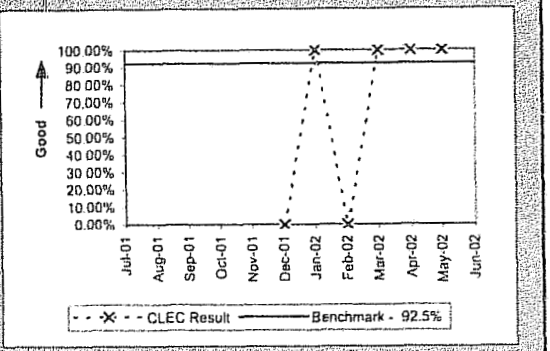
								Mod Z Scr	Parity Scr
								57.55	33.99
								21.91	12.32
								32.12	18.53
								21.53	12.09
								35.47	20.57
								22.72	12.81
								19.34	10.76
								26.56	15.15
								44.45	26.02
								47.46	27.86
								36.01	21.44
								0.02	-0.99



Checklist #2 - Timely Release Notifications

Timely Release Notifications (Percent) Default (Benchmark)

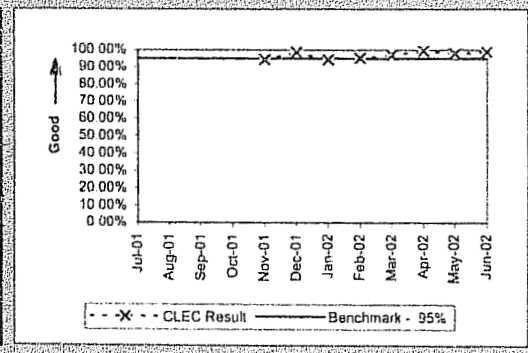
	CLEC Denom	CLEC Result
	0	
	0	
	1	0.00%
	1	100.00%
	2	0.00%
	1	100.00%
	5	100.00%
	5	100.00%
	0	



For example, if there are less than 10 in the reporting month, the standard is 1 miss

Posttest #2 - Stand-Alone Test Environment (SATE) Accuracy

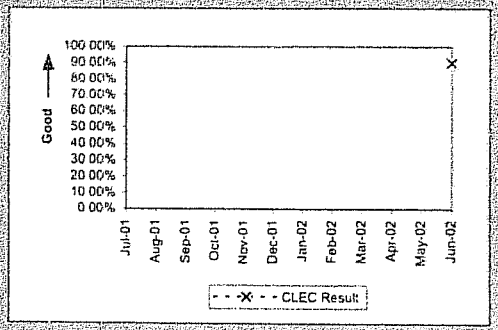
		CLEC Denom	CLEC Result
		379	94.46%
		395	98.73%
		792	94.57%
		649	95.38%
		656	97.10%
		656	99.70%
		659	98.03%
		666	98.95%



Checklist #2 - Manual Service Order Accuracy

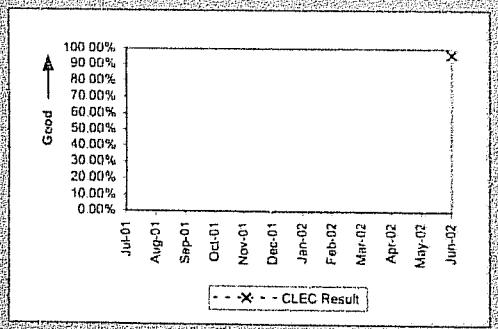
Manual Service Order Accuracy (Percent) (PO-20) (Benchmark)

Sub	CLEC Denom	CLEC Result
398	441	90.25%



Manual Service Order Accuracy (Percent) (PO-20) (Diagnostic)

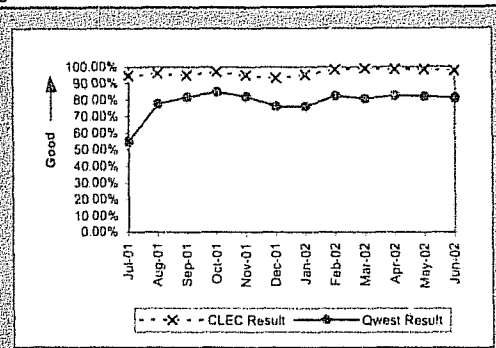
Sub	CLEC Denom	CLEC Result
382	396	96.46%



Checklist #2 - Access To Centers

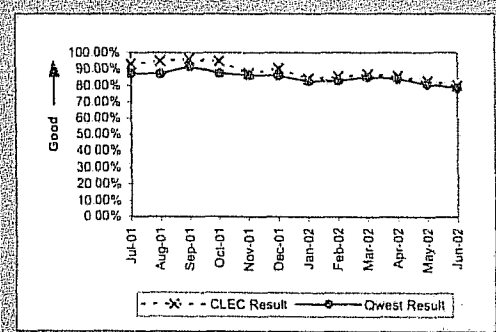
Average Interval - Interconnect Provisioning Center (Percent) (OP-2) (Parity)

		CLEC Result	Qwest Num	Qwest Denom	Qwest Result
		94.85%	2197349	3992969	55.03%
		96.30%	3222289	4238018	77.68%
		94.95%	2723316	3332102	81.73%
		97.20%	3407926	4011312	84.96%
		95.29%	2819748	3441968	81.92%
		93.45%	2528350	3315622	76.29%
		95.50%	3156401	4152609	76.01%
		98.92%	2593071	3147543	82.38%
		98.12%	2636255	3273774	80.59%
		98.55%	2829976	3423085	82.67%
		98.61%	2860939	3519539	82.14%
		97.76%	2606063	3218568	80.97%



Average Interval - Interconnect Repair Center (Percent) (MR-2) (Parity)

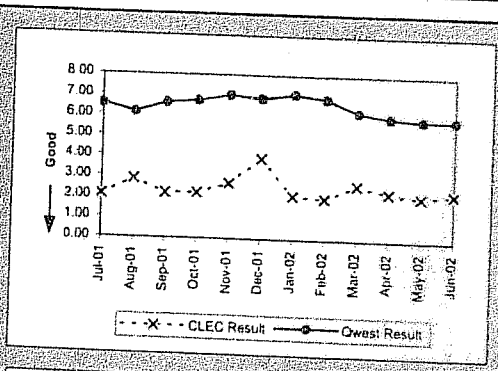
		CLEC Result	Qwest Num	Qwest Denom	Qwest Result
		93.27%	700468	800726	87.48%
		96.11%	842249	736282	87.23%
		96.24%	514443	560881	91.72%
		94.86%	526711	601761	87.53%
		87.64%	472032	546096	86.39%
		90.39%	440835	512988	85.93%
		84.42%	426971	516511	82.66%
		85.54%	356562	429847	82.95%
		87.14%	395295	463412	85.30%
		85.81%	386034	459220	84.06%
		82.78%	378179	468753	80.68%
		80.32%	389434	495518	78.59%



Checklist #2 - Billing

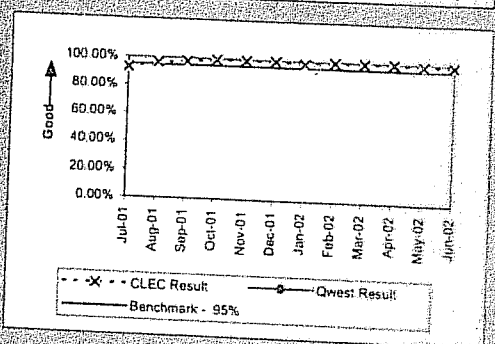
Billing Timeliness Records (Average Days) UNEs and Resale Aggregate (BI-1A) (Parity)

CLEC Num	CLEC Denom	CLEC Result	Qwest Num	Qwest Denom	Qwest Result
	6609073	2.09	610344343	93565971	6.52
	7294639	2.85	609862832	99266616	6.14
	6459847	2.19	537139206	81246682	6.61
	7256415	2.21	586280359	87111713	6.73
	7312725	2.70	569565035	81301546	7.01
	9086437	3.91	549950356	80247866	6.85
	13113127	2.11	593048716	83817742	7.08
	13800761	2.02	470128454	68308938	6.88
	5708265	2.67	493511107	79376589	6.22
	6494461	2.31	537032570	89839151	5.98
	7054708	2.13	522517656	89081177	5.87
	5831056	2.30	400840778	68050446	5.89



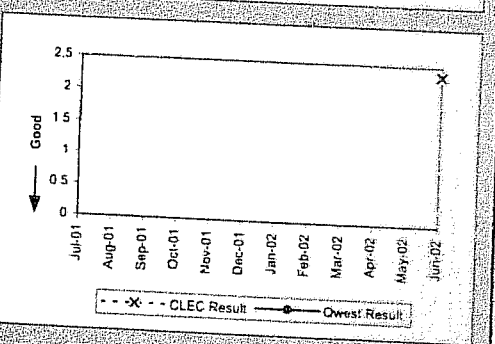
Billing Timeliness Records (Percent) Jointly-provided Switched Access (BI-1B) (Benchmark)

CLEC Num	CLEC Denom	CLEC Result	Qwest Num	Qwest Denom	Qwest Result
	19060264	93.03%			
	17728617	96.63%			
	13086064	97.75%			
	10488448	99.23%			
	17888150	99.23%			
	17634182	99.42%			
	19208085	98.05%			
	17665429	99.64%			
	17830141	99.30%			
	14700370	99.53%			
	15434629	96.52%			
	14463144	98.53%			



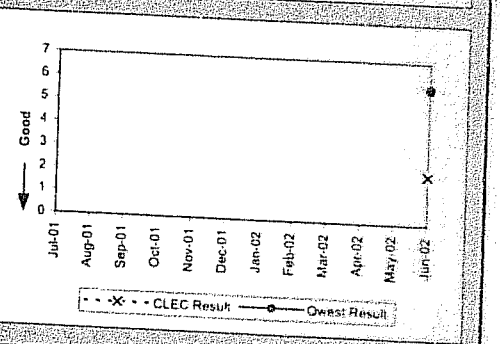
Billing Timeliness Records (CAT10) (Average Days) UNEs and Resale Aggregate (BI-1C-1) (Parity)

CLEC Num	CLEC Denom	CLEC Result	Qwest Num	Qwest Denom	Qwest Result
	4375308	2.36			



Billing Timeliness Records (CAT11) (Average Days) UNEs and Resale Aggregate (BI-1C-2) (Parity)

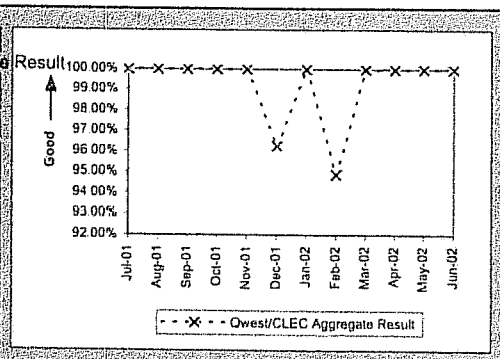
CLEC Num	CLEC Denom	CLEC Result	Qwest Num	Qwest Denom	Qwest Result
	14557482	2.13	400840778	68050446	5.89



Checklist #2 - Billing

Billing Timeliness within 10 Days (Percent) All (BI-2) (Parity)

	Qwest/CLEC Aggregat	Qwest/CLEC Aggregat	Qwest/CLEC Aggregate
	83777	83777	100.00%
	84399	84399	100.00%
	85385	85387	100.00%
	88543	88545	100.00%
	89933	89937	100.00%
	81334	84480	96.28%
	89943	89948	99.99%
	87919	92654	94.89%
	90939	90939	100.00%
	92057	92065	99.99%
	90748	90748	100.00%
	86233	86235	100.00%



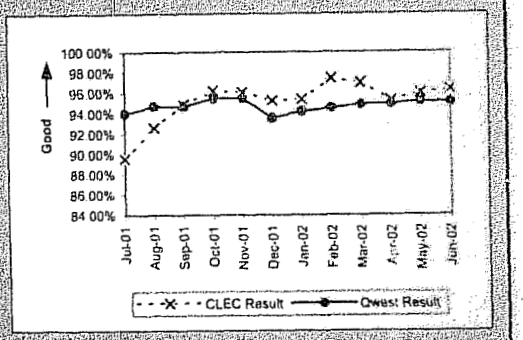
Checklist #2 - Billing

Checklist #2 - Billing

Checklist #2 - Unbundled Network Element - Platform (UNE-P) Installation

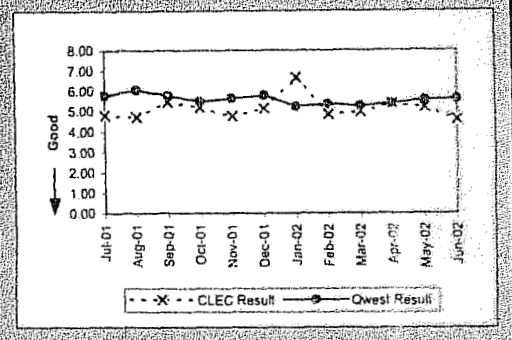
Provisioning Commitments Met Percent (OP-3A) (Parity)-- Dispatches Within MSAs

			CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
			89.09%	30.94%	101453	107913	94.01%	4.58	1.78
			92.64%	26.11%	116968	123510	94.72%	2.32	0.41
			94.91%	21.86%	95960	101360	94.69%	-0.23	-1.14
			96.24%	19.01%	102807	107641	95.51%	-0.89	-1.54
			96.13%	19.29%	90576	94835	95.51%	-0.8	-1.49
			95.29%	21.18%	77849	83187	93.58%	-1.81	-2.1
			95.40%	20.95%	87677	93062	94.21%	-1.4	-1.85
			97.44%	15.80%	75993	80380	94.54%	-3.37	-3.05
			97.02%	17.00%	79869	84176	94.88%	-2.74	-2.67
			95.29%	21.18%	77365	81478	94.95%	-0.44	-1.27
			96.02%	19.55%	79069	83092	95.16%	-1.04	-1.63
			96.33%	18.79%	73394	77187	95.09%	-1.5	-1.91



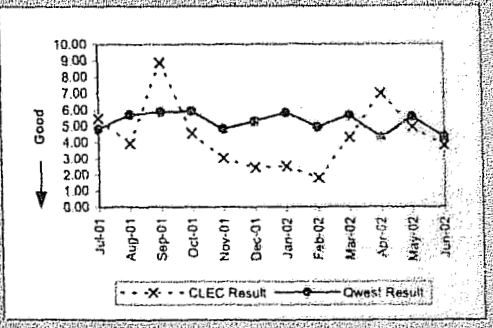
Provisioning Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

			CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
		610	4.82	5.58	627093	108632	5.77	-3.05	-2.86
		628	4.72	4.05	756073	124681	6.06	-3.92	-3.38
		554	5.46	5.99	590685	102246	5.78	-0.92	-1.56
		643	5.18	5.71	594065	108450	5.48	-1.08	-1.65
		522	4.75	4.06	535815	95545	5.61	-3.46	-3.1
		642	5.14	4.40	483094	83716	5.77	-2.42	-2.47
		764	6.67	7.88	491146	93683	5.24	5.91	2.59
		705	4.85	3.56	432139	80849	5.35	-2.14	-2.3
		605	4.96	4.05	444524	84611	5.25	-1.44	-1.88
		652	5.17	5.89	440980	81998	5.38	-0.05	-1.03
		685	5.19	4.45	465033	83625	5.56	-1.49	-1.91
		684	4.58	3.82	435336	77866	5.59	-1.07	-3.47



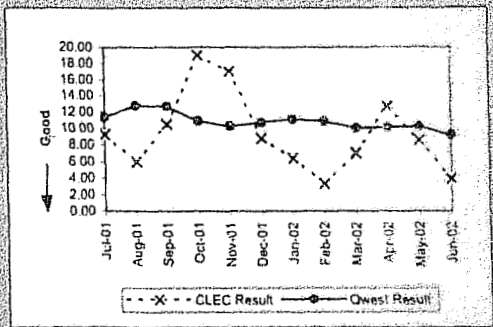
Delayed Days for Facility Reasons (Average Days) (OP-6A-1) (Parity)-- Dispatches Within MSAs

			CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
		42	5.48	11.15	14174	2930	4.84	2.2	0.34
		38	3.96	6.29	16695	2936	5.69	-0.39	-1.23
		16	6.88	12.02	14066	2393	5.88	2.75	0.67
		14	4.57	3.44	15313	2584	5.93	-0.3	-1.18
		27	3.04	4.00	13284	2749	4.83	-0.73	-1.44
		20	2.45	1.62	13731	2596	5.29	-1.02	-1.62
		28	2.54	2.17	17623	3019	5.84	-0.81	-1.49
		15	1.80	1.01	11586	2339	4.95	-1.03	-1.63
		12	4.33	4.36	12141	2146	5.66	-0.26	-1.16
		22	7.00	19.45	8596	1992	4.32	1.51	-0.08
		16	4.94	8.41	10503	1893	5.55	-0.11	-1.07
		10	3.81	5.67	8402	1923	4.37	-0.23	-1.14



Delayed Days for Facility Reasons (Average Days) (OP-6B-1) (Parity)-- Dispatches Within MSAs

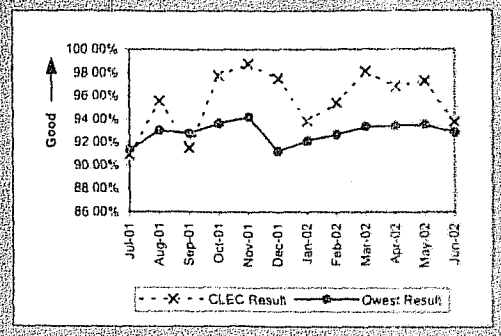
			CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
		23	9.26	12.17	45480	4001	11.37	-0.44	-1.27
		19	5.95	5.46	51808	4065	12.74	-1.23	-1.75
		13	10.46	10.87	43173	3424	12.61	-0.29	-1.17
		11	19.00	21.77	31553	2910	10.84	2.88	0.75
		5	17.00	29.69	22697	2225	10.20	3.72	1.26
		12	8.75	7.83	30644	2870	10.68	-0.5	-1.3
		6	6.38	4.34	27747	2510	11.05	-0.62	-1.38
		3	3.33	2.52	22975	2128	10.80	-0.76	-1.46
		12	7.00	9.82	22382	2244	9.97	-0.7	-1.42
		18	12.61	14.76	22258	2214	10.05	0.91	-0.45
		12	8.50	7.81	22642	2234	10.14	-0.37	-1.22
		5	3.89	3.86	18016	1976	9.12	-0.77	-1.47



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Installation

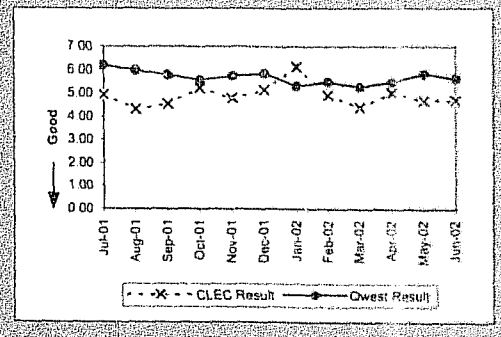
Installation Commitments Met (Percent) (OP-3B) (Parity)-- Dispatches Outside MSAs

Sub-Type	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	98	99	98.91%	28.75%	24477	26802	91.33%	0.19	-0.88
[illegible]	130	136	95.59%	20.54%	28879	31044	93.03%	-1.17	-1.71
[illegible]	97	106	91.51%	27.87%	23779	25642	92.73%	0.52	-0.69
[illegible]	132	136	97.83%	14.58%	27120	28950	93.68%	-2	-2.21
[illegible]	162	164	98.78%	10.98%	24003	25483	94.19%	-2.5	-2.52
[illegible]	180	183	97.55%	15.47%	19992	21913	91.23%	-2.84	-2.73
[illegible]	299	327	93.83%	24.06%	21795	23655	92.14%	-0.94	-1.57
[illegible]	186	191	96.43%	20.86%	19054	20562	92.67%	-1.48	-1.9
[illegible]	264	269	98.14%	13.51%	20928	22417	93.36%	-3.13	-2.9
[illegible]	215	222	96.85%	17.47%	20608	22052	93.45%	-2.03	-2.24
[illegible]	311	323	97.31%	16.16%	22390	23942	93.52%	-2.29	-2.39
[illegible]	226	243	93.83%	24.11%	20404	21971	92.87%	-0.54	-1.33



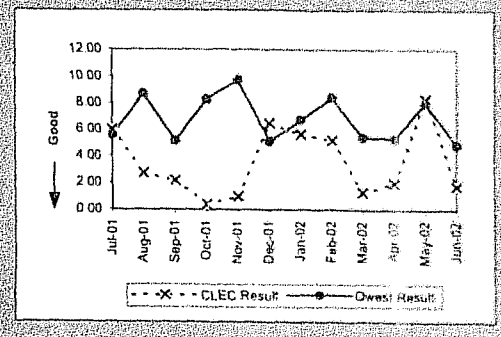
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Sub-Type	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	455	100	4.55	5.39	167845	27015	6.21	-0.87	-1.53
[illegible]	595	137	4.34	3.84	188088	31345	6.00	-1.8	-2.09
[illegible]	478	108	4.43	3.90	150120	25862	5.80	-1.39	-1.85
[illegible]	640	141	5.25	4.29	162443	29151	5.57	-0.33	-1.2
[illegible]	796	166	4.80	5.27	147419	25641	5.75	-1.06	-1.64
[illegible]	960	167	5.15	5.05	129088	22050	5.85	-0.7	-1.43
[illegible]	1441	239	6.16	7.56	127251	23811	5.34	1.02	-0.38
[illegible]	936	166	4.94	4.67	113835	20683	5.50	-0.52	-1.32
[illegible]	1184	269	4.40	3.45	119303	22535	5.29	-1.29	-1.79
[illegible]	1125	222	5.05	5.43	122106	22196	5.50	-0.86	-1.53
[illegible]	1262	224	4.70	4.39	140663	24086	5.84	-1.42	-1.86
[illegible]	1011	213	4.73	4.08	125302	22151	5.66	-1.95	-2.19



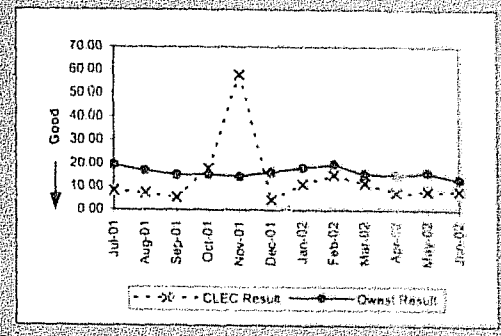
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Parity)-- Dispatches Outside MSAs

Sub-Type	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	36	6	6.00	6.54	4517	812	5.56	2.05	0.25
[illegible]	11	4	2.75	2.06	6640	761	8.73	-0.32	-1.19
[illegible]	11	5	2.20	2.17	3183	615	5.18	-0.67	-1.4
[illegible]	2	5	0.40	0.55	6022	726	8.29	-0.46	-1.28
[illegible]	3	3	1.00	1.00	6120	629	9.73	-0.31	-1.19
[illegible]	15	2	6.50	2.12	3952	767	5.15	1.02	-0.38
[illegible]	36	6	5.67	8.33	5886	876	6.72	-0.11	-1.07
[illegible]	21	4	5.25	7.85	5848	692	8.45	-0.18	-1.11
[illegible]	4	3	1.33	0.58	3373	619	5.45	-0.3	-1.18
[illegible]	4	2	2.00	0.00	3085	579	5.33	-0.28	-1.17
[illegible]	25	3	8.33	12.70	5039	627	8.04	0.98	-0.4
[illegible]	5	5	1.60	1.30	2783	574	4.85	-0.63	-1.38



Delayed Days for Facility Reasons (Average Days) (OP-6B-2) (Parity)-- Dispatches Outside MSAs

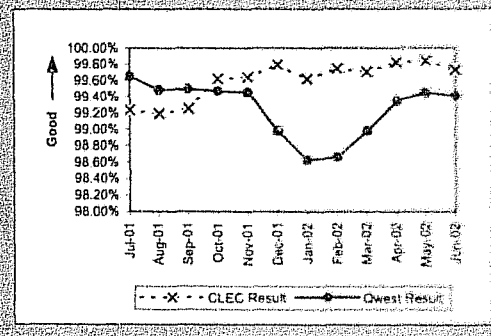
Sub-Type	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	25	3	8.33	6.11	31477	1638	19.22	-0.39	-1.23
[illegible]	15	2	7.50	3.54	25640	1521	16.86	-0.45	-1.27
[illegible]	22	4	5.50	9.11	20871	1375	15.18	-0.72	-1.44
[illegible]	18	1	18.00		19326	1262	15.31	2.88	0.75
[illegible]	58	1	58.00		14499	1009	14.37	2.88	0.75
[illegible]	9	2	4.50	4.95	19096	1179	16.20	-0.37	-1.22
[illegible]	100	9	11.11	17.73	18628	1027	18.14	-0.41	-1.25
[illegible]	76	5	15.20	10.40	16560	846	19.57	-0.16	-1.1
[illegible]	23	2	11.50	6.36	13637	885	15.41	-0.11	-1.07
[illegible]	37	5	7.40	6.54	13418	892	15.04	-0.79	-1.48
[illegible]	24	3	8.00	7.00	15005	946	15.86	-0.38	-1.23
[illegible]	75	9	8.44	10.88	13094	1007	13.00	-0.69	-1.42



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Installation

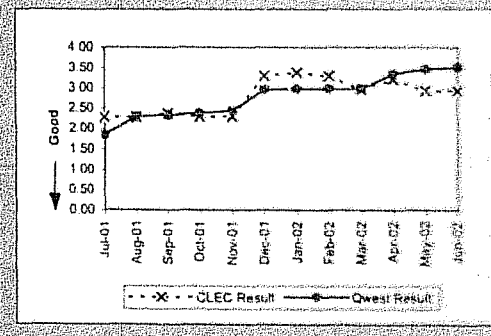
Installation Commitments Met (Percent) (OP-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	4046	4077	99.24%	8.69%	555358	557267	99.66%	4.55	1.77
Aug-01	3094	3119	99.20%	8.92%	240124	241361	99.49%	2.25	0.37
Sep-01	2739	2755	99.26%	8.58%	183829	184762	99.50%	1.55	-0.06
Oct-01	3706	3720	99.62%	6.12%	186902	187892	99.47%	-1.26	-1.76
Nov-01	5288	5305	99.64%	5.97%	167443	168363	99.45%	-1.83	-2.11
Dec-01	6276	6289	99.80%	4.51%	140807	142255	98.98%	-6.34	-4.86
Jan-02	3001	3020	99.62%	6.14%	159880	162104	98.63%	-5.96	-4.62
Feb-02	4786	4798	99.75%	4.99%	146720	148713	98.66%	-6.46	-4.93
Mar-02	4460	4473	99.71%	5.38%	161741	163403	98.98%	-4.78	-3.9
Apr-02	5121	5130	99.82%	4.18%	163792	164867	99.35%	-4.18	-3.54
May-02	7668	7670	99.84%	3.95%	184653	185677	99.45%	-4.58	-3.78
Jun-02	9356	9381	99.73%	5.16%	175513	176553	99.41%	-3.98	-3.42



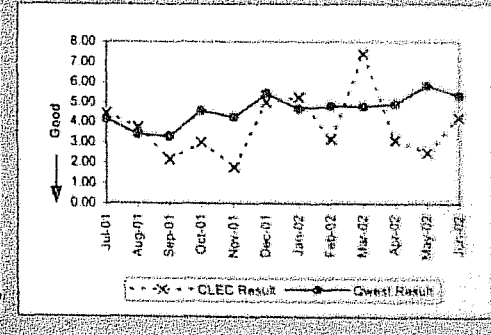
Installation Interval (Average Days) (OP-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	6943	3042	2.28	1.74	743549	401825	1.85	17.63	9.72
Aug-01	3950	1733	2.28	1.18	360659	157320	2.29	-0.36	-1.22
Sep-01	2497	1052	2.37	1.61	297832	127837	2.33	0.98	-0.4
Oct-01	3907	1704	2.29	1.52	303545	128213	2.37	-1.95	-2.19
Nov-01	6955	3026	2.30	0.92	277197	113429	2.44	-6.32	-4.84
Dec-01	15250	4626	3.30	1.02	314750	106279	2.96	8.77	4.33
Jan-02	8496	2512	3.38	1.61	377406	126657	2.98	11.11	5.76
Feb-02	9523	3023	3.30	1.22	333979	111948	2.98	8.73	4.31
Mar-02	4393	1483	2.96	1.78	348915	117503	2.97	-0.19	-1.12
Apr-02	9434	1885	3.22	2.08	386883	116106	3.33	-2.73	-2.66
May-02	6708	2972	2.93	1.69	442904	127972	3.46	-17.03	-11.35
Jun-02	8948	3016	2.93	1.22	425529	121506	3.50	-19.9	-13.1



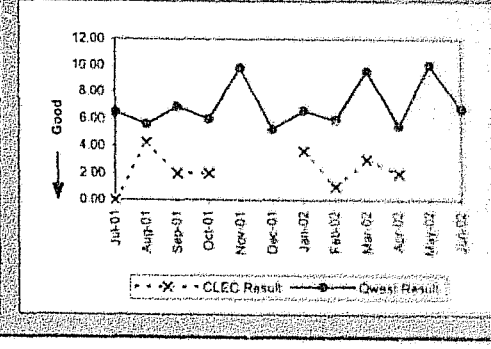
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-3) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	135	31	4.45	12.87	8655	2077	4.17	1.88	0.14
Aug-01	56	24	3.75	5.51	4680	1388	3.37	1.6	0.09
Sep-01	41	19	2.16	3.42	3222	984	3.27	-0.39	-1.23
Oct-01	69	13	3.00	2.92	5154	1128	4.57	-0.33	-1.2
Nov-01	41	23	1.78	1.93	4415	1041	4.24	-0.65	-1.4
Dec-01	70	14	5.00	9.15	7432	1369	5.43	-0.07	-1.04
Jan-02	84	16	5.25	7.59	9948	2137	4.66	0.73	-0.56
Feb-02	38	12	3.17	1.85	9210	1914	4.81	-0.42	-1.26
Mar-02	89	12	7.42	15.20	7528	1570	4.79	0.95	-0.42
Apr-02	28	9	3.11	1.83	4835	983	4.92	-0.36	-1.22
May-02	35	14	2.50	2.38	5471	938	5.83	-0.74	-1.45
Jun-02	106	25	4.24	4.29	4795	897	5.35	-0.47	-1.28



Delayed Days for Facility Reasons (Average Days) (OP-6B-3) (Parity)-- No Dispatches

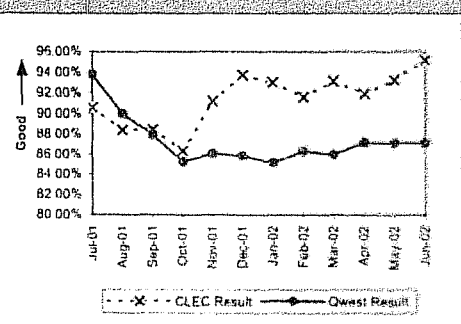
Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	0	1	0.00		1108	171	6.48	-0.25	-1.15
Aug-01	17	4	4.25	2.99	1074	192	5.59	-0.24	-1.15
Sep-01	4	2	2.00	1.41	1144	166	6.89	-0.31	-1.19
Oct-01	2	1	2.00		765	128	5.98	-0.16	-1.1
Nov-01					903	92	9.82		
Dec-01					664	127	5.23		
Jan-02	11	3	3.67	3.79	993	150	6.62	-0.36	-1.22
Feb-02	1	1	1.00		729	123	5.93	-0.56	-1.34
Mar-02	3	1	3.00		1310	137	9.56	-0.22	-1.13
Apr-02	2	1	2.00		620	113	5.49	-0.53	-1.32
May-02					1093	109	10.03		
Jun-02					1038	154	6.74		



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Installation

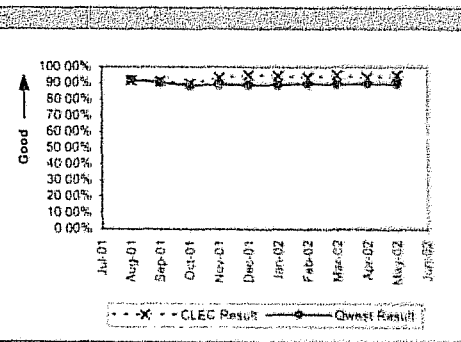
New Service Installation Quality (Percent) (OP-5) (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	4471	4941	90.61%	29.17%	762606	812845	93.82%	9.34	4.68
[illegible]	3635	4339	88.41%	32.01%	491277	545987	89.98%	3.44	1.09
[illegible]	2968	3355	88.47%	31.94%	313188	356286	87.90%	-0.99	-1.6
[illegible]	3163	3664	86.33%	34.36%	272655	319858	85.24%	-1.84	-2.12
[illegible]	4893	5354	91.39%	28.33%	264829	307780	86.04%	-10.8	-7.56
[illegible]	6393	6722	93.77%	24.18%	230809	268981	85.81%	-18.47	-12.23
[illegible]	8166	8627	93.04%	25.44%	224878	264042	85.17%	-17.82	-11.83
[illegible]	5366	5859	91.62%	27.71%	228814	265128	86.30%	-11.71	-8.12
Mar-02	6244	6828	93.18%	25.21%	223975	260522	85.97%	-15.4	-10.36
Apr-02	5367	5859	91.64%	27.22%	235194	269913	87.14%	-10.87	-7.61
May-02	6891	7379	93.25%	25.09%	245039	281325	87.10%	-15.56	-10.46
Jun-02	8898	9442	95.19%	21.39%	248464	285075	87.16%	-22.96	-14.96



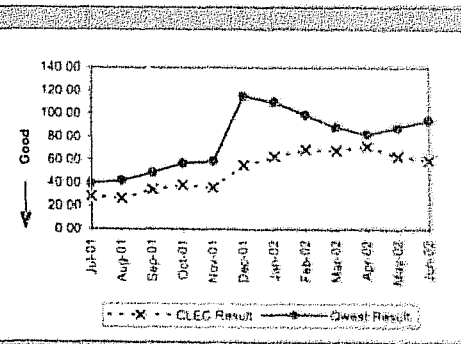
New Service Installation Quality (Percent) (OP-5*) (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
[illegible]	3927	4339	91.66%	27.65%	502621	545987	92.06%	0.97	-0.41
[illegible]	3057	3355	91.12%	28.45%	321988	356286	90.37%	-1.45	-1.88
[illegible]	3284	3664	89.63%	30.49%	283195	319858	88.54%	-2.06	-2.25
[illegible]	5002	5354	93.43%	24.78%	274419	307780	89.16%	-9.95	-7.05
[illegible]	6367	6722	95.02%	21.76%	239584	268981	89.07%	-15.43	-10.38
[illegible]	6277	6627	94.72%	22.37%	234394	264042	88.77%	-15.15	-10.21
[illegible]	5487	5859	93.65%	24.38%	237961	265128	89.75%	-9.73	-6.92
[illegible]	5352	5628	95.10%	21.60%	232566	260522	89.27%	-13.97	-9.5
Apr-02	5468	5859	93.67%	24.35%	242059	269913	89.68%	-9.93	-7.03
May-02	7001	7379	94.88%	22.05%	251815	281325	89.51%	-14.85	-10.03
Jun-02									



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

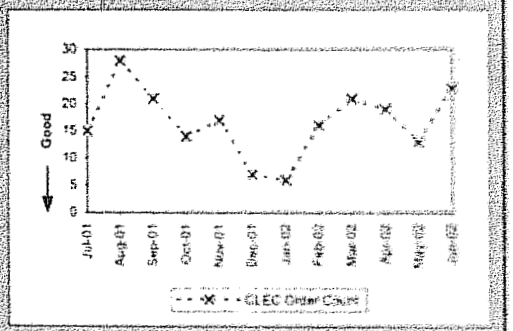
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	1367	46	29.48	37.53	453684	11506	39.43	-1.33	-1.81
[illegible]	2492	93	26.80	36.26	587797	13976	42.06	-2.38	-2.45
[illegible]	2120	62	34.19	36.08	653994	13371	48.91	-1.64	-2
[illegible]	2138	56	38.18	42.73	720435	12620	57.09	-1.81	-2.1
[illegible]	2383	66	36.11	44.67	845031	14351	58.88	-2.27	-2.38
[illegible]	3172	57	55.65	63.54	1050497	9141	114.92	-3.15	-2.92
[illegible]	3527	56	62.98	72.72	968375	8810	109.92	-2.57	-2.56
[illegible]	4431	64	69.23	76.92	892991	9014	99.07	-1.84	-2.12
[illegible]	5399	79	68.34	80.77	958118	10829	88.48	-1.45	-1.88
[illegible]	5837	81	72.06	90.11	996619	12128	82.18	-0.81	-1.49
[illegible]	5686	93	63.29	92.72	1081765	12325	87.77	-1.92	-2.17
[illegible]	6582	110	59.84	91.24	1186500	12590	94.40	-2.76	-2.68



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Installation

Count of Pending Orders Delayed for Facilities Reasons UNE - P (POTS) (OP-15B) (Diagnostic)

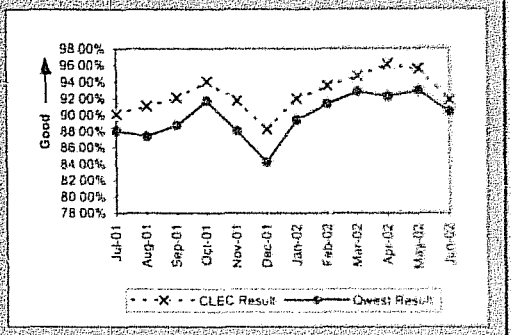
Date	CLEC Order Count
Jul-01	15
Aug-01	28
Sep-01	21
Oct-01	14
Nov-01	17
Dec-01	7
Jan-02	6
Feb-02	16
Mar-02	21
Apr-02	19
May-02	13
Jun-02	23



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Repair

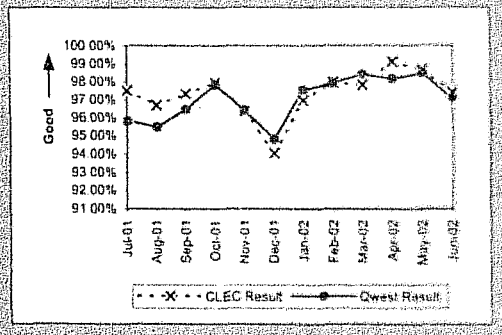
Out of Service Cleared within 24 hours (Percent) (MR-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	632	701	90.16%	29.79%	112515	127723	88.09%	-1.68	-2.02
Aug-01	700	768	91.15%	28.41%	112632	128820	87.43%	-3.09	-2.88
Sep-01	539	585	92.14%	26.92%	86686	97653	88.77%	-2.57	-2.56
Oct-01	591	628	94.11%	23.55%	86609	94407	91.74%	-2.15	-2.31
Nov-01	503	548	91.79%	27.45%	76893	87269	88.11%	-2.65	-2.61
Dec-01	423	479	88.31%	32.13%	68465	81247	84.27%	-2.42	-2.47
Jan-02	440	476	92.05%	27.05%	64664	72305	89.43%	-1.86	-2.13
Feb-02	407	435	93.56%	24.54%	56170	61484	91.36%	-1.63	-1.99
Mar-02	433	457	94.75%	22.31%	61763	66537	92.83%	-1.59	-1.97
Apr-02	495	515	96.12%	19.32%	67580	73266	92.24%	-3.28	-2.99
May-02	564	590	95.59%	20.52%	72896	78407	92.97%	-2.48	-2.51
Jun-02	577	628	91.88%	27.32%	76974	85152	90.40%	-1.26	-1.76



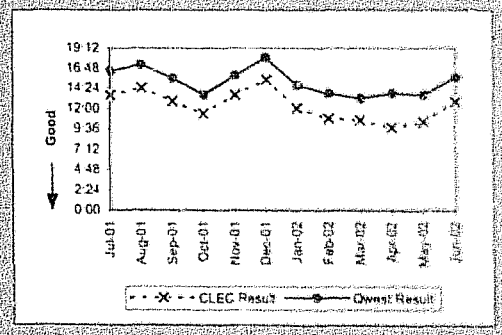
All Troubles Cleared within 48 hours (Percent) (MR-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	859	881	97.50%	15.60%	162971	170054	95.83%	-2.47	-2.5
Aug-01	939	971	96.70%	17.85%	167518	175435	95.49%	-1.82	-2.11
Sep-01	768	789	97.34%	16.10%	129084	133810	96.47%	-1.32	-1.8
Oct-01	807	824	97.94%	14.21%	127808	130646	97.83%	-0.21	-1.13
Nov-01	715	742	96.36%	18.73%	117095	121450	96.41%	0.08	-0.95
Dec-01	616	657	94.06%	23.63%	107738	113619	94.82%	0.88	-0.47
Jan-02	608	628	96.97%	17.13%	99019	101537	97.52%	0.88	-0.47
Feb-02	579	591	97.97%	14.10%	82878	84635	97.92%	-0.08	-1.05
Mar-02	585	598	97.83%	14.58%	88657	90099	98.40%	1.11	-0.32
Apr-02	676	682	99.12%	9.34%	98196	100047	98.15%	-1.87	-2.14
May-02	746	756	98.68%	11.42%	104549	106177	98.47%	-0.47	-1.29
Jun-02	796	815	97.42%	15.84%	109324	112580	97.11%	-0.54	-1.33



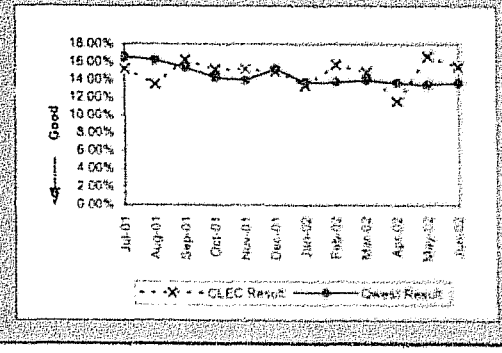
Mean Time to Restore (Hours:Minutes) (MR-6A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	11984:37	881	13:36	13:06	2795680:03	170054	16:26	-3.53	-3.15
Aug-01	14009:36	971	14:26	16:29	3022829:48	175435	17:14	-3.84	-3.34
Sep-01	10152:14	789	12:52	13:45	2087316:26	133810	15:36	-4.71	-3.86
Oct-01	9396:56	824	11:24	13:18	1779047:28	130646	13:37	-4.2	-3.56
Nov-01	10103:54	742	13:37	15:08	1935673:57	121450	15:56	-3.49	-3.12
Dec-01	10155:45	657	15:27	17:15	2050342:48	113619	18:03	-3.08	-2.87
Jan-02	7581:10	628	12:04	13:38	1495737:09	101537	14:44	-4.03	-3.45
Feb-02	6409:46	591	10:51	11:12	1164103:21	84635	13:45	-4.98	-4.03
Mar-02	6362:15	598	10:38	12:59	1188243:35	90099	13:11	-4.71	-3.86
Apr-02	6688:25	682	9:48	9:49	1380842:05	100047	13:48	-7.16	-5.35
May-02	7916:42	756	10:30	11:40	1444464:36	106177	13:36	-6.44	-4.92
Jun-02	10416:43	815	12:47	12:29	1765947:41	112580	15:41	-5.65	-4.44



Repair Repeat Report Rate (Percent) (MR-7A) (Parity)-- Dispatches Within MSAs

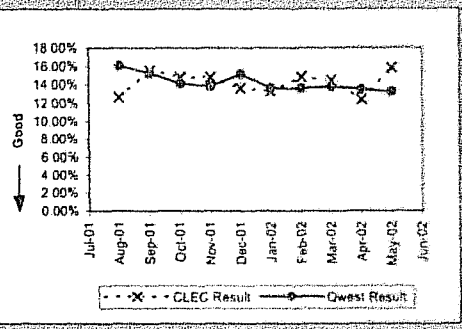
Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	140	917	15.27%	35.97%	29262	176603	16.57%	-1.06	-1.64
Aug-01	134	992	13.51%	34.18%	29611	182956	16.18%	-2.28	-2.39
Sep-01	131	806	16.25%	36.89%	21376	139015	15.38%	0.69	-0.58
Oct-01	129	849	15.19%	35.90%	19379	135743	14.28%	0.76	-0.54
Nov-01	117	768	15.23%	35.94%	17575	125979	13.95%	1.02	-0.38
Dec-01	102	682	14.96%	35.66%	18054	118561	15.23%	-0.2	-1.12
Jan-02	87	651	13.36%	34.03%	14486	105482	13.73%	-0.27	-1.17
Feb-02	95	605	15.70%	36.38%	12055	87573	13.77%	1.38	-0.16
Mar-02	91	610	14.92%	35.63%	12992	92986	13.97%	0.67	-0.59
Apr-02	82	705	11.63%	32.06%	14073	103052	13.66%	-1.56	-1.95
May-02	130	782	16.62%	37.23%	14701	109266	13.45%	2.59	0.57
Jun-02	131	846	15.48%	36.18%	15614	115970	13.64%	1.56	-0.05



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Repair

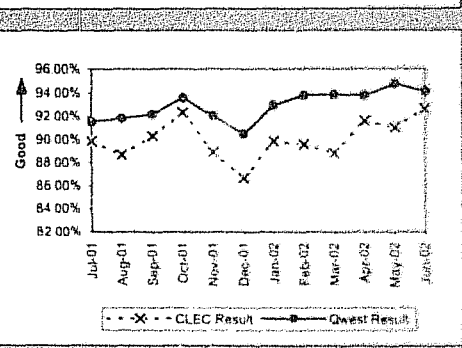
Repair Repeat Report Rate (Percent) (MR-7A*) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
[illegible]									
Aug-01	104	819	12 70%	33 30%	26319	163381	16 11%	-2 65	-2.61
Sep-01	104	666	15 62%	36 30%	19002	124486	15 26%	0 25	-0 65
Oct-01	104	699	14 88%	35 59%	17122	120682	14 16%	0 54	-0 67
Nov-01	97	654	14 83%	35 54%	15615	112829	13 84%	0 73	-0 55
Dec-01	79	579	13 64%	34 33%	16048	105887	15 16%	-1 01	-1.61
Jan-02	71	533	13 32%	33 98%	12839	93973	13 66%	-0 23	-1.14
Feb-02	74	498	14 86%	35 57%	10716	78638	13 63%	0 8	-0.51
Mar-02	74	510	14 51%	35 22%	11725	84853	13 82%	0 45	-0.73
Apr-02	77	621	12 40%	32 96%	12958	95894	13 51%	-0 81	-1 49
May-02	111	701	15 83%	36 51%	13581	102427	13 26%	2	0 22
Jun-02									



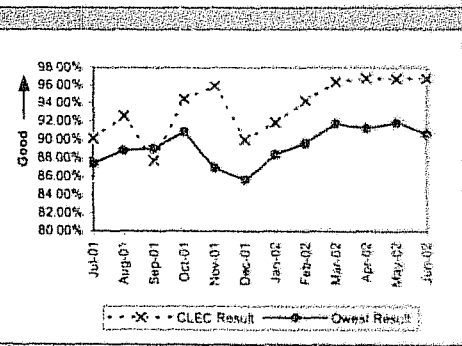
Repair Appointments Met (Percent) (MR-9A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	824	917	89 86%	30 19%	161685	176603	91 55%	1 84	0 12
Aug-01	860	992	86 71%	31 65%	168018	182956	91 84%	3 59	1 18
Sep-01	725	806	90 32%	29 57%	128144	139015	92 18%	1 96	0 19
Oct-01	784	848	92 34%	26 59%	127055	135743	93 60%	1 49	-0 09
Nov-01	683	768	88 93%	31 37%	115966	125979	92 05%	3 19	0 94
Dec-01	591	682	86 66%	34 00%	107274	118561	90 48%	3 39	1 06
Jan-02	585	651	89 86%	30 18%	98036	105482	92 94%	3 06	0 86
Feb-02	542	605	89 59%	30 54%	82138	87573	93 79%	4 27	1 6
Mar-02	543	610	88 85%	31 47%	87281	92986	93 86%	5 14	2 13
Apr-02	646	705	91 63%	27 69%	96637	103052	93 78%	2 35	0 43
May-02	713	782	91 05%	28 55%	103539	109266	94 76%	4 64	1 82
Jun-02	784	846	92 67%	26 06%	109175	115970	94 14%	1 81	0 1



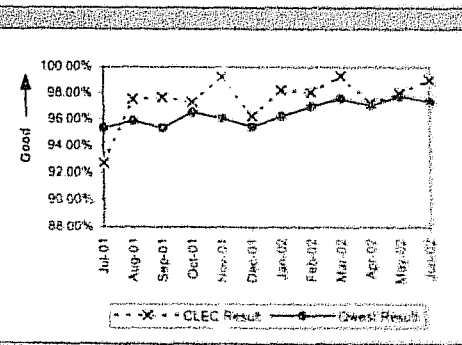
Out of Service Cleared within 24 hours (Percent) (MR-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	82	91	90 11%	29 85%	31406	35931	87 41%	-0 78	-1 47
Aug-01	112	121	92 56%	26 24%	31878	35884	88 84%	-1 3	-1 79
Sep-01	86	98	87 76%	32 78%	23818	26756	89 02%	0 43	-0 74
Oct-01	103	109	94 50%	22 81%	22791	25082	90 87%	-1 31	-1 8
Nov-01	94	98	95 92%	19 79%	20267	23317	86 92%	-2 64	-2 6
Dec-01	99	110	90 00%	30 00%	17557	20495	85 66%	-1 29	-1 79
Jan-02	113	123	91 87%	27 33%	15863	17945	88 40%	-1 2	-1 73
Feb-02	116	122	94 26%	23 26%	14326	15988	89 60%	-1 68	-2 02
Mar-02	102	111	96 40%	18 64%	16197	17654	91 75%	-1 77	-2 08
Apr-02	151	156	96 79%	17 61%	19244	21101	91 20%	-2 46	-2 49
May-02	148	153	96 73%	17 78%	20711	22554	91 83%	-2 21	-2 34
Jun-02	150	155	96 77%	17 67%	23956	26431	90 64%	-2 62	-2 59



All Troubles Cleared within 48 hours (Percent) (MR-4B) (Parity)-- Dispatches Outside MSAs

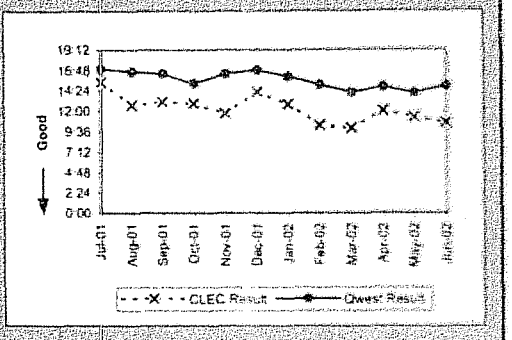
Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	115	124	92 74%	25 94%	46508	48783	95 34%	1 31	-0 2
Aug-01	159	163	97 55%	15 47%	47530	49572	95 88%	-1 07	-1 65
Sep-01	128	131	97 71%	14 96%	35404	37126	95 36%	-1 28	-1 78
Oct-01	146	150	97 33%	16 11%	34434	35660	96 56%	-0 52	-1 31
Nov-01	134	135	99 26%	8 57%	32191	33502	96 09%	-1 9	-2 15
Dec-01	154	160	96 25%	19 00%	28212	29560	95 44%	-0 49	-1 3
Jan-02	168	171	98 25%	13 13%	25596	26550	96 26%	-1 36	-1 83
Feb-02	154	157	98 09%	13 69%	22156	22839	97 01%	-0 79	-1 48
Mar-02	149	150	99 33%	8 14%	24338	24936	97 60%	-1 38	-1 84
Apr-02	214	220	97 27%	16 29%	28612	29479	97 06%	-0 19	-1 71
May-02	198	202	98 02%	13 93%	30345	31030	97 79%	-0 22	-1 13
Jun-02	206	208	99 04%	9 76%	34170	35089	97 38%	-1 49	-1 91



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Repair

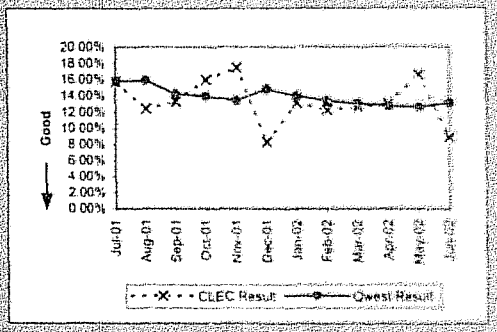
Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	1914:58	124	15:27	17:28	830936:42	48783	17:02	-0.93	-1.57
Aug-01	2074:42	163	12:44	12:24	824847:58	49572	16:38	-2.71	-2.65
Sep-01	1723:23	131	13:09	12:49	609397:08	37126	16:25	-2	-2.22
Oct-01	1940:01	150	12:56	13:18	545078:48	35660	15:17	-1.5	-1.91
Nov-01	1586:19	135	11:45	10:38	549404:12	33502	16:24	-3.3	-3
Dec-01	2288:02	160	14:18	18:30	498678:41	29560	16:52	-1.86	-2.13
Jan-02	2196:33	171	12:51	11:13	427559:03	26590	16:05	-2.32	-2.41
Feb-02	1630:01	157	10:23	10:35	344738:51	22839	15:06	-3.31	-3.01
Mar-02	1505:04	150	10:02	9:15	354928:35	24936	14:14	-2.16	-2.32
Apr-02	2650:57	220	12:03	17:31	437336:43	29479	14:50	-2.24	-2.36
May-02	2282:22	202	11:18	11:34	439131:35	31030	14:09	-2.77	-2.68
Jun-02	2223:29	208	10:41	9:51	525148:30	35089	14:58	-4.25	-3.58



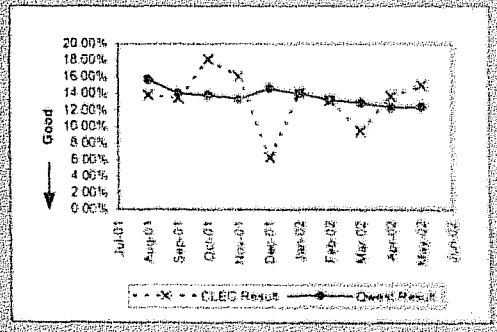
Repair Repeat Report Rate (Percent) (MR-7B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	20	127	15.75%	36.43%	7869	49888	15.77%	-0.01	-1
Aug-01	21	168	12.50%	33.07%	8125	51067	15.91%	-1.21	-1.73
Sep-01	18	135	13.33%	33.99%	5407	37955	14.25%	-0.3	-1.18
Oct-01	24	150	16.00%	36.66%	5091	36456	13.96%	0.73	-0.56
Nov-01	25	143	17.48%	37.98%	4600	34219	13.44%	1.38	-0.16
Dec-01	14	167	8.38%	27.71%	4489	30320	14.81%	-2.33	-2.42
Jan-02	23	175	13.14%	33.79%	3812	27210	14.01%	-0.33	-1.2
Feb-02	20	163	12.27%	32.81%	3122	23338	13.38%	-0.41	-1.25
Mar-02	19	150	12.67%	33.26%	3328	25446	13.08%	-0.15	-1.09
Apr-02	29	222	13.06%	33.70%	3814	29966	12.73%	0.17	-0.9
May-02	34	205	16.59%	37.19%	3995	31605	12.64%	1.65	0
Jun-02	19	213	8.92%	28.50%	4712	35771	13.17%	-1.83	-2.11



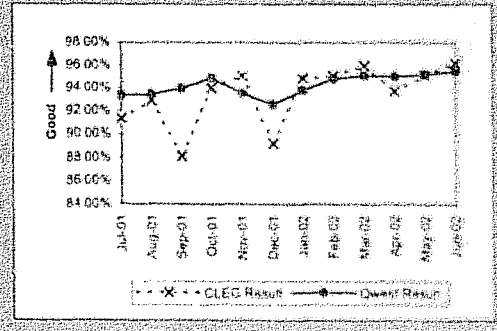
Repair Repeat Report Rate (Percent) (MR-7B') (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	18	130	13.85%	34.54%	7035	44882	15.67%	-0.57	-1.35
Sep-01	15	111	13.51%	34.19%	4713	33585	14.03%	-0.16	-1.1
Oct-01	23	127	18.11%	38.51%	4451	32149	13.84%	1.36	-0.17
Nov-01	18	112	16.07%	36.73%	4009	30040	13.35%	0.85	-0.48
Dec-01	8	125	6.40%	24.48%	3905	26638	14.66%	-2.6	-2.58
Jan-02	21	149	14.09%	34.80%	3290	23485	14.01%	0.06	-0.97
Feb-02	18	136	13.24%	33.89%	2727	20575	13.25%	-0.01	-1
Mar-02	12	126	9.52%	29.35%	2956	22839	12.94%	-1.14	-1.69
Apr-02	26	190	13.68%	34.37%	3395	27548	12.32%	0.58	-0.64
May-02	26	173	15.03%	35.74%	3644	29286	12.44%	1.02	-0.38
Jun-02									



Repair Appointments Met (Percent) (MR-9B) (Parity)-- Dispatches Outside MSAs

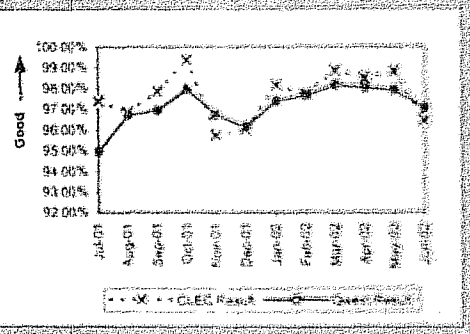
Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	116	127	91.34%	28.13%	46564	49888	93.34%	0.9	-0.45
Aug-01	156	168	92.86%	25.75%	47705	51067	93.42%	0.33	-0.8
Sep-01	119	135	88.15%	32.32%	35651	37955	93.93%	2.53	0.54
Oct-01	141	150	94.00%	23.75%	34590	36456	94.88%	0.52	-0.68
Nov-01	136	143	95.10%	21.58%	32007	34219	93.54%	-0.76	-1.46
Dec-01	149	167	89.22%	31.01%	28061	30320	92.55%	1.57	-0.05
Jan-02	166	175	94.86%	22.09%	25517	27210	93.78%	-0.59	-1.36
Feb-02	155	163	95.09%	21.60%	22124	23338	94.80%	-0.17	-1.1
Mar-02	144	150	96.00%	19.60%	24196	25446	95.09%	-0.52	-1.31
Apr-02	208	222	93.69%	24.31%	28465	29966	94.99%	0.89	-0.46
May-02	195	205	95.12%	21.54%	30083	31605	95.18%	0.09	-0.95
Jun-02	205	213	96.24%	19.01%	34156	35771	95.49%	-0.53	-1.32



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Repair

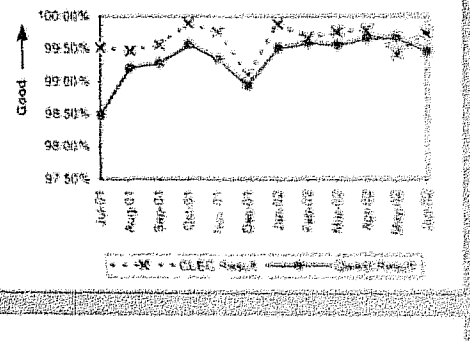
Out of Service Cleared within 24 hours (Percent) (MR-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	262	269	97.40%	15.92%	34095	35903	94.96%	-1.82	-2.11
Aug-01	310	320	96.88%	17.40%	33526	34662	96.72%	-0.15	-1.09
Sep-01	232	237	97.89%	14.37%	26285	27113	96.95%	-0.84	-1.51
Oct-01	318	320	99.38%	7.88%	30811	31447	97.98%	-1.77	-2.07
Nov-01	226	236	95.76%	20.14%	26493	27388	96.73%	0.84	-0.49
Dec-01	242	252	96.03%	19.52%	24948	25944	96.16%	0.15	-0.91
Jan-02	271	276	98.19%	13.34%	26397	27097	97.42%	-0.8	-1.49
Feb-02	259	265	97.74%	14.88%	25539	26150	97.66%	-0.08	-1.05
Mar-02	262	265	98.87%	10.58%	27727	28244	98.17%	-0.84	-1.51
Apr-02	264	268	98.51%	12.13%	21257	21685	98.03%	-0.56	-1.34
May-02	252	255	98.82%	10.78%	22094	22560	97.93%	-0.99	-1.6
Jun-02	245	254	96.46%	18.49%	21199	21840	97.07%	0.6	-0.63



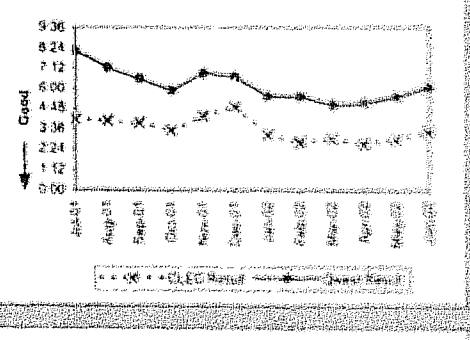
All Troubles Cleared within 48 hours (Percent) (MR-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	830	834	99.52%	6.91%	64164	65148	98.49%	-2.43	-2.47
Aug-01	940	945	99.47%	7.25%	64491	65006	99.21%	-0.91	-1.55
Sep-01	685	688	99.56%	6.59%	50879	51247	99.28%	-0.87	-1.53
Oct-01	970	971	99.90%	3.21%	59033	59294	99.56%	-1.57	-1.96
Nov-01	828	830	99.76%	4.90%	53741	54095	99.35%	-1.47	-1.89
Dec-01	782	789	99.11%	9.38%	49654	50188	98.94%	-0.46	-1.29
Jan-02	885	886	99.89%	3.36%	56303	56579	99.51%	-1.59	-1.97
Feb-02	902	905	99.67%	5.75%	54018	54241	99.59%	-0.32	-1.23
Mar-02	843	845	99.76%	4.86%	57437	57692	99.56%	-0.89	-1.54
Apr-02	914	916	99.78%	4.67%	48175	48343	99.65%	-0.66	-1.4
May-02	872	877	99.43%	7.53%	47775	47931	99.67%	1.26	-0.23
Jun-02	772	774	99.74%	5.08%	44312	44554	99.46%	-1.07	-1.65



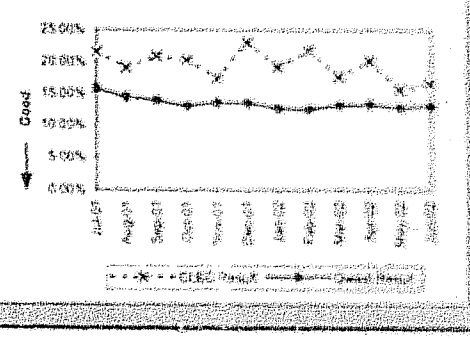
Mean Time to Restore (Hours:Minutes) (MR-6C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	3476:45	834	4:10	8:10	535372:53	65148	8:13	-5.92	-4.6
Aug-01	3835:17	945	4:04	7:03	469979:14	65006	7:14	-6.93	-5.21
Sep-01	2708:44	688	3:56	7:21	335511:41	51247	6:33	-6.26	-4.81
Oct-01	3376:07	971	3:29	5:08	347746:48	59294	5:52	-8.24	-6.01
Nov-01	3587:35	830	4:19	7:03	372065:27	54095	6:53	-7.26	-5.42
Dec-01	3671:03	789	4:54	13:49	336125:39	50188	6:42	-0.71	-1.43
Jan-02	2877:47	886	3:15	5:48	311740:03	56579	5:31	-6.4	-4.69
Feb-02	2571:36	905	2:50	6:43	297097:16	54241	5:29	-8.57	-6.21
Mar-02	2558:05	845	3:02	6:54	288634:10	57692	5:00	-6.65	-5.05
Apr-02	2484:57	916	2:43	6:33	245529:14	48343	5:05	-8.81	-6.36
May-02	2637:05	877	3:00	8:06	263375:30	47931	5:30	-8.58	-6.22
Jun-02	2650:19	774	3:25	7:01	268598:32	44554	6:02	-6.73	-5.05



Repair Repeat Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

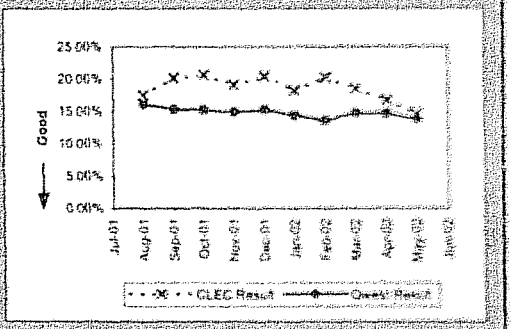
Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	180	834	21.58%	41.14%	10241	65157	15.72%	4.62	1.81
Aug-01	181	945	19.15%	39.35%	9424	55057	14.49%	4.05	1.46
Sep-01	144	688	20.93%	40.68%	7131	51250	13.91%	5.28	2.21
Oct-01	197	971	20.29%	40.21%	7763	59296	13.09%	6.59	3.01
Nov-01	145	830	17.47%	37.97%	7351	54097	13.59%	3.24	0.97
Dec-01	183	789	23.19%	42.21%	6823	50188	13.59%	7.81	3.75
Jan-02	171	886	19.30%	39.47%	7163	56581	12.66%	5.9	2.59
Feb-02	198	905	21.88%	41.34%	6806	54248	12.55%	8.41	4.11
Mar-02	150	845	17.75%	38.21%	7618	57708	13.20%	3.88	1.36
Apr-02	185	916	20.20%	40.15%	6437	48346	13.31%	6.07	2.69
May-02	138	877	15.74%	36.41%	6166	47934	12.86%	2.52	0.53
Jun-02	129	774	16.67%	37.27%	5832	44752	13.03%	2.98	0.81



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Repair

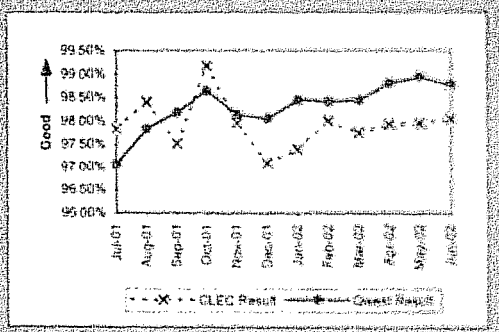
Repair Repeat Report Rate (Percent) (MR-7C*) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	96	547	17.55%	38.04%	5138	31963	16.07%	0.93	-0.43
Sep-01	87	430	20.23%	40.17%	3769	24556	15.35%	2.69	0.63
Oct-01	126	610	20.66%	40.48%	4091	26819	15.25%	3.67	1.23
Nov-01	100	522	19.16%	39.35%	3607	24228	14.89%	2.71	0.65
Dec-01	104	509	20.43%	40.32%	3283	21527	15.25%	3.21	0.95
Jan-02	105	592	18.24%	38.62%	3532	24493	14.42%	2.62	0.59
Feb-02	115	566	20.32%	40.24%	3200	23496	13.62%	4.59	1.79
Mar-02	95	511	18.59%	38.90%	3831	25920	14.78%	2.4	0.46
Apr-02	92	548	16.79%	37.38%	3112	21152	14.71%	1.35	-0.18
May-02	79	542	14.58%	35.29%	3067	22147	13.85%	0.48	-0.71
Jun-02									



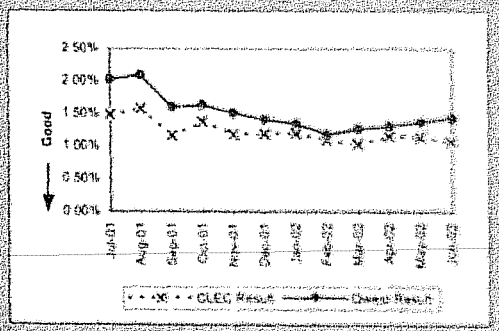
Repair Appointments Met (Percent) (MR-9C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	816	834	97.84%	14.53%	63244	65157	97.06%	-1.32	-1.8
Aug-01	930	945	98.41%	12.50%	63651	65057	97.84%	-1.2	-1.73
Sep-01	671	688	97.53%	15.52%	50321	51250	98.19%	1.29	-0.22
Oct-01	963	971	99.18%	9.04%	58490	59296	98.64%	-1.43	-1.87
Nov-01	813	830	97.95%	14.16%	53092	54097	98.14%	0.4	-0.75
Dec-01	765	769	97.08%	16.82%	49212	50188	98.06%	1.96	0.19
Jan-02	853	866	97.40%	15.90%	55704	56581	98.45%	2.5	0.52
Feb-02	887	905	98.01%	13.96%	53390	54248	98.42%	0.97	-0.41
Mar-02	826	845	97.75%	14.83%	56810	57708	98.44%	1.61	-0.02
Apr-02	897	916	97.93%	14.25%	47769	48346	98.81%	2.43	0.48
May-02	859	877	97.95%	14.18%	47425	47934	98.94%	2.84	0.72
Jun-02	759	774	98.06%	13.79%	44207	44752	98.78%	1.81	0.1



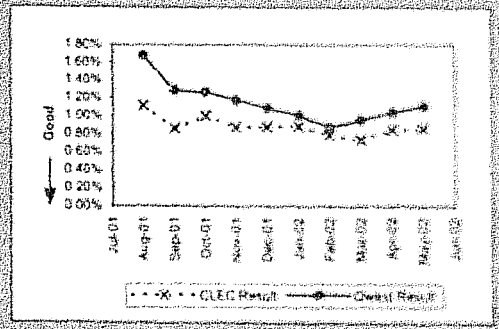
Trouble Rate (Percent) (MR-8) (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	1876	126861	1.48%	12.08%	291648	14395514	2.03%	-13.73	-9.35
Aug-01	2166	133826	1.57%	12.44%	299080	14314198	2.09%	-13.15	-8.99
Sep-01	1629	140274	1.16%	10.71%	228220	14285037	1.60%	-12.97	-8.89
Oct-01	1970	143128	1.38%	11.65%	231495	14244813	1.63%	-7.41	-5.5
Nov-01	1741	146889	1.19%	10.82%	214295	14182796	1.51%	-10.18	-7.19
Dec-01	1538	137622	1.19%	10.84%	199069	14128582	1.41%	-6.85	-5.17
Jan-02	1712	142824	1.20%	10.88%	189273	14064648	1.35%	-4.8	-3.92
Feb-02	1673	152385	1.10%	10.42%	165159	13985013	1.18%	-2.99	-2.82
Mar-02	1605	155481	1.03%	10.11%	176140	13955969	1.26%	-8.07	-5.91
Apr-02	1643	159653	1.15%	10.68%	181364	13871941	1.31%	-5.35	-4.25
May-02	1864	163766	1.14%	10.61%	188805	13793902	1.37%	-7.98	-5.85
Jun-02	1833	170553	1.07%	10.31%	196493	13708111	1.43%	-12.38	-8.53



Trouble Rate (Percent) (MR-8*) (Parity)

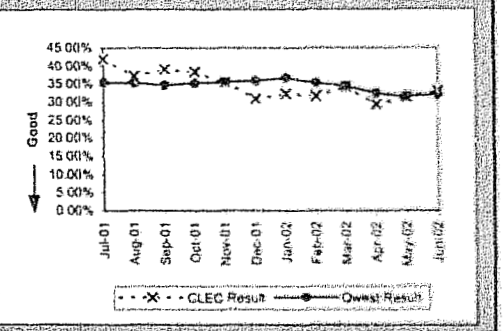
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	1496	133826	1.12%	10.51%	240226	14314198	1.68%	-15.88	-10.66
Sep-01	1207	140274	0.86%	9.24%	182527	14285037	1.28%	-13.87	-9.43
Oct-01	1436	143128	1.00%	9.97%	179850	14244813	1.26%	-8.74	-6.31
Nov-01	1288	146889	0.88%	9.32%	167097	14182796	1.18%	-10.65	-7.47
Dec-01	1213	137622	0.88%	9.35%	154052	14128582	1.09%	-7.43	-5.52
Jan-02	1274	142824	0.89%	9.40%	141952	14064648	1.01%	-4.41	-3.68
Feb-02	1200	152385	0.79%	8.84%	122709	13985013	0.88%	-3.74	-3.28
Mar-02	1147	155481	0.74%	8.56%	133612	13955969	0.96%	-8.85	-6.38
Apr-02	1359	159653	0.85%	9.19%	144594	13871941	1.04%	-7.48	-5.55
May-02	1416	163766	0.86%	9.26%	153860	13793902	1.12%	-9.61	-6.84
Jun-02									



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Repair

Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)

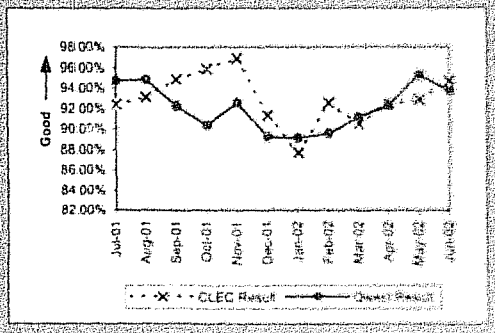
Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std D	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	1361	3239	42.02%	49.36%	160820	452468	35.54%	7.67	3.66
Aug-01	1252	3357	37.30%	48.36%	163134	462214	35.29%	2.42	0.47
Sep-01	1049	2678	39.17%	48.81%	120985	349205	34.65%	4.9	1.98
Oct-01	1230	3200	38.44%	48.64%	126039	357534	35.25%	3.75	1.28
Nov-01	960	2701	35.54%	47.86%	118295	332590	35.57%	-0.03	-1.02
Dec-01	734	2372	30.94%	46.23%	111619	310688	35.93%	-5.04	-4.06
Jan-02	818	2530	32.33%	46.77%	109681	298954	36.69%	-4.53	-3.75
Feb-02	776	2449	31.69%	46.53%	89958	255117	35.26%	-3.69	-3.24
Mar-02	836	2441	34.25%	47.45%	92031	268171	34.32%	-0.07	-1.04
Apr-02	767	2610	29.39%	45.55%	86886	268250	32.39%	-3.26	-2.98
May-02	848	2712	31.27%	46.36%	86780	275585	31.49%	-0.25	-1.15
Jun-02	905	2738	33.05%	47.04%	92452	288945	32.00%	1.18	-0.28



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Installation

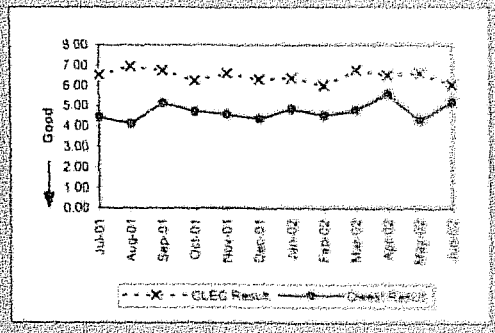
Installation Commitments Met (Percent) (OP-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	848	917	92.48%	26.38%	1050	1108	94.77%	2.3	0.4
Aug-01	952	1022	93.15%	25.26%	1240	1307	94.87%	1.87	0.14
Sep-01	711	749	94.93%	21.95%	863	935	92.30%	-2.01	-2.22
Oct-01	870	907	95.92%	19.78%	801	886	90.41%	-3.96	-3.41
Nov-01	721	744	96.91%	17.31%	753	813	92.62%	-3.23	-2.97
Dec-01	689	754	91.38%	28.07%	449	503	89.26%	-1.19	-1.72
Jan-02	737	840	87.74%	32.80%	699	784	89.16%	0.92	-0.44
Feb-02	590	637	92.62%	26.14%	568	634	89.59%	-1.77	-2.08
Mar-02	639	706	90.51%	29.31%	622	682	91.20%	0.46	-0.72
Apr-02	652	705	92.48%	26.37%	595	644	92.39%	-0.06	-1.04
May-02	723	776	92.93%	25.63%	773	811	95.31%	2.25	0.37
Jun-02	834	880	94.77%	22.26%	576	614	93.81%	-0.76	-1.46



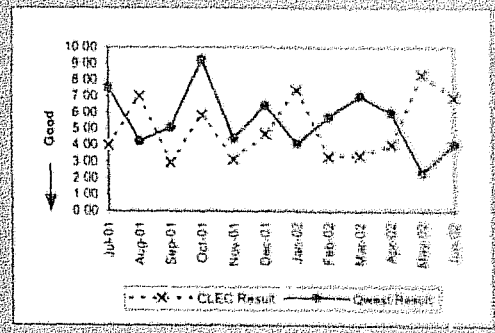
Installation Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	6129	937	6.54	5.50	4988	1124	4.44	7.64	3.65
Aug-01	7183	1032	6.96	6.33	5437	1324	4.11	14.66	7.91
Sep-01	5142	759	6.77	5.40	4961	965	5.14	5.35	2.25
Oct-01	5736	917	6.26	5.49	4279	905	4.73	4.85	1.95
Nov-01	4998	750	6.62	6.04	3734	813	4.59	7.39	3.5
Dec-01	4806	760	6.32	5.91	2186	500	4.37	6.12	2.72
Jan-02	5444	851	6.40	5.40	3814	790	4.83	3.81	1.32
Feb-02	3564	642	6.02	4.19	2900	64	4.52	5.61	2.41
Mar-02	4818	712	6.77	5.74	3288	691	4.76	5.3	2.23
Apr-02	4664	717	6.53	5.26	3621	650	5.57	1.99	0.21
May-02	5185	784	6.62	7.10	3455	808	4.28	8.29	4.04
Jun-02	5348	883	6.06	5.91	3202	618	5.18	2.57	0.56



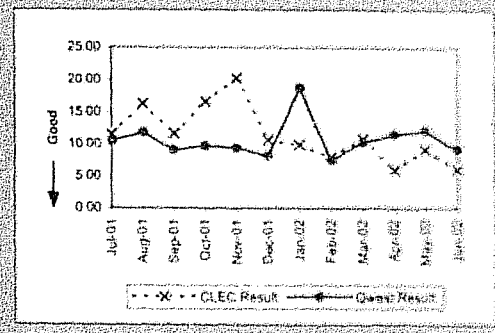
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-1) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	156	39	4.00	8.07	302	40	7.55	-1.3	-1.79
Aug-01	337	48	7.02	11.45	234	55	4.25	0.71	-0.57
Sep-01	68	23	2.96	2.90	356	70	5.09	-0.91	-1.55
Oct-01	152	26	5.85	6.07	444	48	9.25	-0.68	-1.41
Nov-01	60	20	3.15	4.85	225	51	4.41	-0.53	-1.32
Dec-01	202	43	4.70	7.68	181	28	6.46	-0.7	-1.42
Jan-02	517	70	7.39	30.88	225	55	4.09	0.46	-0.72
Feb-02	117	35	3.34	3.99	126	22	5.73	-1.02	-1.62
Mar-02	151	45	3.36	6.68	295	42	7.02	-1.03	-1.63
Apr-02	162	40	4.05	4.46	197	33	5.97	-0.91	-1.55
May-02	300	36	8.33	22.70	52	22	2.36	2.1	0.27
Jun-02	187	27	6.93	20.83	81	20	4.05	0.02	-0.99



Delayed Days for Facility Reasons (Average Days) (OP-6B-1) (Parity)-- Dispatches Within MSAs

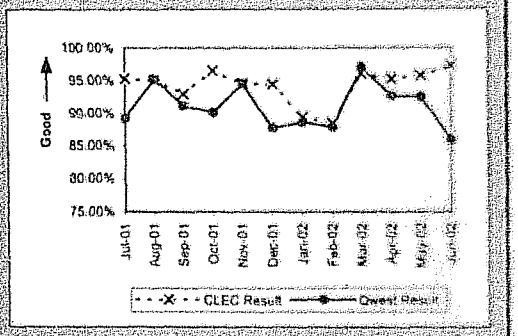
Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	406	35	11.60	11.44	232	22	10.55	0.66	-0.6
Aug-01	391	24	16.29	18.38	213	18	11.83	0.92	-0.44
Sep-01	187	16	11.69	9.82	265	29	9.14	0.67	-0.6
Oct-01	233	14	16.64	25.18	497	51	9.75	1.28	-0.22
Nov-01	182	9	20.22	19.38	283	30	9.43	1.88	0.14
Dec-01	235	22	10.68	13.30	238	29	8.21	1.11	-0.33
Jan-02	319	32	9.97	10.86	637	34	18.74	-1.61	-1.98
Feb-02	105	13	8.08	9.29	345	46	7.50	0.62	-0.62
Mar-02	229	21	10.90	17.69	187	18	10.39	0.11	-0.93
Apr-02	96	16	6.00	2.92	209	18	11.61	-1.36	-1.82
May-02	185	20	9.25	11.34	207	17	12.18	-0.91	-1.56
Jun-02	127	21	6.05	4.82	174	19	9.16	-0.69	-1.42



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Installation

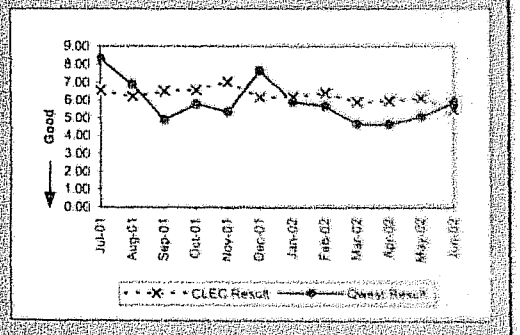
Installation Commitments Met (Percent) (OP-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	323	339	95.28%	21.21%	125	140	89.29%	-1.93	-2.17
Aug-01	425	447	95.08%	21.63%	160	168	95.24%	0.04	-0.98
Sep-01	253	272	93.01%	25.49%	124	136	91.18%	-0.62	-1.38
Oct-01	280	290	96.55%	18.25%	110	122	90.16%	-1.99	-2.21
Nov-01	263	278	94.60%	22.59%	86	91	94.51%	-0.04	-1.02
Dec-01	224	237	94.51%	22.77%	79	90	87.78%	-1.66	-2.01
Jan-02	246	275	89.45%	30.71%	78	88	88.64%	-0.21	-1.13
Feb-02	209	236	88.56%	31.83%	80	91	87.91%	-0.16	-1.1
Mar-02	270	281	96.09%	19.39%	99	102	97.06%	0.38	-0.77
Apr-02	285	299	95.32%	21.13%	88	95	92.63%	-0.87	-1.53
May-02	343	358	95.81%	20.04%	99	107	92.52%	-1.13	-1.69
Jun-02	325	334	97.31%	16.19%	67	78	85.90%	-2.61	-2.58



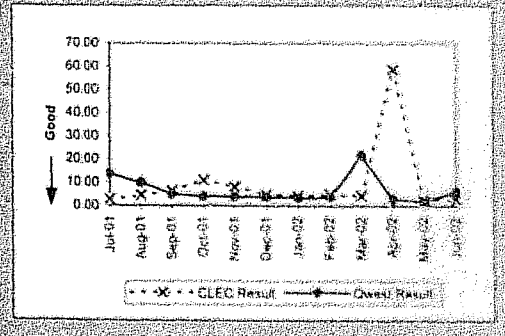
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	2263	347	6.58	7.73	1179	142	8.30	-1.43	-1.87
Aug-01	2828	453	6.24	4.50	1181	171	6.91	-1.14	-1.69
Sep-01	1805	276	6.54	6.01	669	136	4.92	4.47	1.72
Oct-01	1949	295	6.61	9.14	714	123	5.80	1.28	-0.22
Nov-01	1969	279	7.06	6.41	493	92	5.36	0.51	-0.69
Dec-01	1473	238	6.19	5.53	714	93	7.68	-1.1	-1.67
Jan-02	1729	279	6.20	5.32	527	89	5.92	0.06	-0.96
Feb-02	1530	238	6.43	6.17	516	91	5.67	1.01	-0.39
Mar-02	1677	284	5.90	3.98	485	104	4.66	1.23	-0.25
Apr-02	1803	302	5.97	3.64	445	96	4.64	1.55	-0.05
May-02	2203	360	6.12	5.57	546	108	5.06	1.47	-0.11
Jun-02	1836	336	5.46	2.75	495	84	5.89	-0.6	-1.36



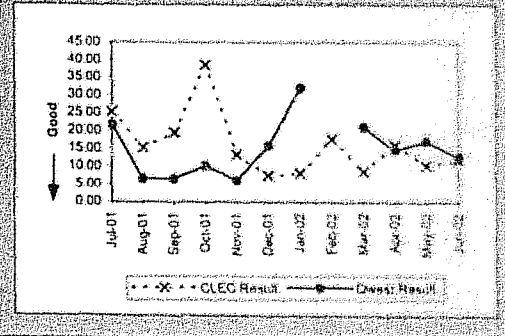
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	24	9	2.67	2.96	82	6	13.67	-1	-1.61
Aug-01	80	18	4.44	3.75	69	7	9.86	-1.61	-1.98
Sep-01	84	13	6.46	8.27	40	8	5.00	0.51	-0.69
Oct-01	67	6	11.17	18.76	12	3	4.00	1.26	-0.23
Nov-01	83	10	8.30	13.08	16	4	4.00	0.23	-0.86
Dec-01	24	5	4.80	4.32	27	7	3.86	0.22	-0.86
Jan-02	89	21	4.24	9.59	20	6	3.33	-0.33	-1.2
Feb-02	83	17	4.88	8.05	39	11	3.55	0.06	-0.97
Mar-02	35	8	4.38	6.80	87	4	21.75	-0.68	-1.42
Apr-02	528	9	58.67	167.77	15	5	3.00	1.19	-0.28
May-02	22	9	2.44	1.24	9	5	1.80	0.41	-0.75
Jun-02	11	4	2.75	2.87	36	6	6.00	-1.16	-1.71



Delayed Days for Facility Reasons (Average Days) (OP-6B-2) (Parity)-- Dispatches Outside MSAs

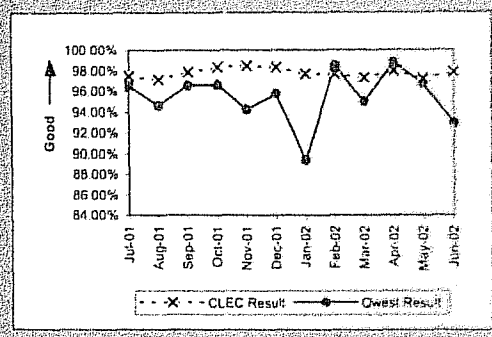
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	202	8	25.25	32.87	195	9	21.67	0.44	-0.73
Aug-01	61	4	15.25	7.97	13	2	6.50	0.9	-0.45
Sep-01	136	7	19.43	11.80	26	4	6.50	2.1	0.27
Oct-01	193	5	38.60	48.69	91	9	10.11	2.17	0.32
Nov-01	80	6	13.33	12.42	12	2	6.00	0.53	-0.68
Dec-01	60	8	7.50	3.02	79	5	15.80	-0.47	-1.29
Jan-02	65	8	8.12	5.33	128	4	32.00	-1.66	-2.01
Feb-02	176	10	17.60	14.45					
Mar-02	34	4	8.50	5.00	21	1	21.00		
Apr-02	64	4	16.00	14.72	29	2	14.50	-0.27	-1.16
May-02	62	6	10.33	11.29	34	2	17.00	-0.96	-1.59
Jun-02	59	5	11.80	13.70	63	5	12.60	-0.11	-1.07



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Installation

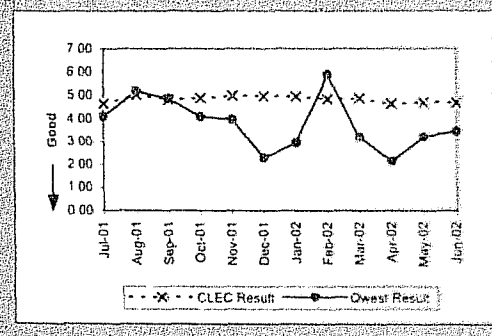
Installation Commitments Met (Percent) (OP-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	[illegible]	[illegible]	97.51%	15.59%	563	583	96.57%	-1.12	-1.68
[illegible]	[illegible]	[illegible]	97.16%	16.61%	407	430	94.65%	-2.09	-2.27
[illegible]	[illegible]	[illegible]	97.91%	14.31%	425	440	96.59%	-1.37	-1.83
[illegible]	[illegible]	[illegible]	98.35%	12.74%	231	239	96.65%	-1.33	-1.81
[illegible]	[illegible]	[illegible]	98.49%	12.20%	131	139	94.24%	-2.06	-2.25
[illegible]	[illegible]	[illegible]	98.32%	12.86%	45	47	95.74%	-0.87	-1.53
[illegible]	[illegible]	[illegible]	97.70%	14.98%	59	66	89.39%	-2.17	-2.32
[illegible]	[illegible]	[illegible]	97.69%	15.04%	64	65	98.46%	0.28	-0.83
[illegible]	[illegible]	[illegible]	97.34%	16.10%	38	40	95.00%	-0.67	-1.4
[illegible]	[illegible]	[illegible]	98.01%	13.96%	83	84	98.81%	0.39	-0.77
[illegible]	[illegible]	[illegible]	97.21%	16.47%	119	123	96.75%	-0.27	-1.16
[illegible]	[illegible]	[illegible]	97.87%	14.43%	79	85	92.94%	-1.68	-2.02



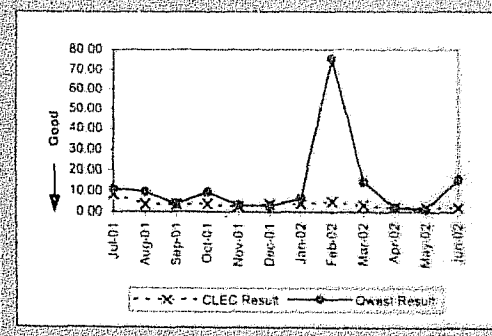
Installation Interval (Average Days) (OP-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	[illegible]	[illegible]	4.86	3.69	2356	573	4.11	2.27	0.38
[illegible]	[illegible]	[illegible]	5.04	2.25	2180	422	5.17	-0.54	-1.33
[illegible]	[illegible]	[illegible]	4.83	1.67	2107	433	4.87	-0.37	-1.23
[illegible]	[illegible]	[illegible]	4.89	1.97	933	228	4.09	3.87	1.35
[illegible]	[illegible]	[illegible]	4.99	1.49	524	132	3.97	5.01	2.05
[illegible]	[illegible]	[illegible]	4.08	1.73	103	45	2.29	3.72	1.26
[illegible]	[illegible]	[illegible]	4.97	1.81	190	64	2.97	2.75	0.67
[illegible]	[illegible]	[illegible]	4.65	1.79	382	65	5.88	-0.46	-1.28
[illegible]	[illegible]	[illegible]	4.88	1.63	128	40	3.20	2.17	0.32
[illegible]	[illegible]	[illegible]	4.64	1.67	181	84	2.15	3.72	1.26
[illegible]	[illegible]	[illegible]	4.71	2.29	396	123	3.22	11.23	5.83
[illegible]	[illegible]	[illegible]	4.69	1.48	291	84	3.46	1.33	-0.19



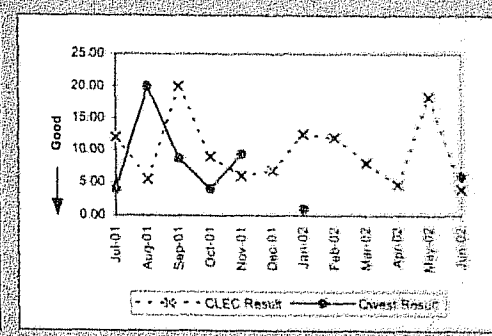
Delayed Days for Non-Facility Reasons (Average Days) (OP-5A-3) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	[illegible]	[illegible]	8.32	18.62	232	21	11.05	-0.49	-1.3
[illegible]	[illegible]	[illegible]	3.69	7.14	218	23	9.48	-1.69	-2.15
[illegible]	[illegible]	[illegible]	3.56	5.61	47	13	3.62	0.05	-0.97
[illegible]	[illegible]	[illegible]	3.89	4.11	94	10	9.40	-1.91	-2.16
[illegible]	[illegible]	[illegible]	2.65	2.06	23	7	3.29	-0.64	-1.39
[illegible]	[illegible]	[illegible]	3.75	3.74	6	2	3.00	0.29	-0.82
[illegible]	[illegible]	[illegible]	4.09	6.23	57	9	6.33	-0.69	-1.42
[illegible]	[illegible]	[illegible]	4.96	5.46	151	2	75.50	-1.97	-1.65
[illegible]	[illegible]	[illegible]	3.22	2.15	29	2	14.50	-0.95	-1.58
[illegible]	[illegible]	[illegible]	2.13	1.25	2	1	2.00		
[illegible]	[illegible]	[illegible]	2.17	1.82	4	3	1.33	0.35	-0.79
[illegible]	[illegible]	[illegible]	2.07	1.54	78	5	15.60	-1.37	-1.83



Delayed Days for Facility Reasons (Average Days) (OP-6B-3) (Parity)-- No Dispatches

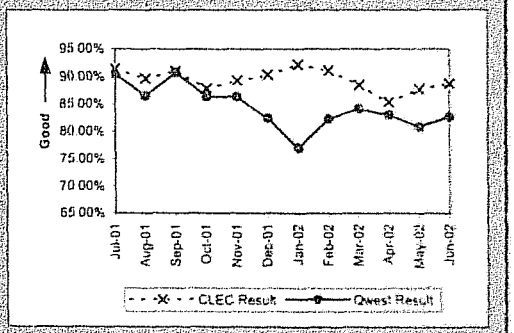
Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	[illegible]	[illegible]	12.00	9.65	4	1	4.00		
[illegible]	[illegible]	[illegible]	5.50	2.12	20	1	20.00		
[illegible]	[illegible]	[illegible]	20.00		26	3	8.67	0.97	-0.41
[illegible]	[illegible]	[illegible]	9.00	4.00	4	1	4.00		
[illegible]	[illegible]	[illegible]	6.00	4.24	28	3	9.33	-0.57	-1.35
[illegible]	[illegible]	[illegible]	6.83	9.02					
[illegible]	[illegible]	[illegible]	12.50	7.78	1	1	1.00		
[illegible]	[illegible]	[illegible]	12.00	12.73					
[illegible]	[illegible]	[illegible]	8.00	8.49					
[illegible]	[illegible]	[illegible]	4.67	2.08					
[illegible]	[illegible]	[illegible]	18.33	23.97					
[illegible]	[illegible]	[illegible]	4.00		6	1	6.00		



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Installation

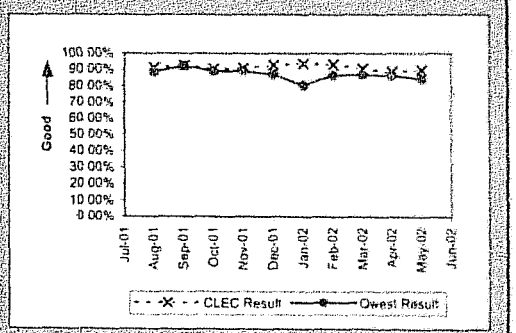
New Service Installation Quality (Percent) (OP-5) (Parity)

[illegible]	CLEC Num	CLEC Den	CLEC Result	CLEC Std D	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	[illegible]	4151	91.44%	27.98%	1966	2171	90.56%	-1.13	-1.69
[illegible]	[illegible]	3560	89.72%	30.37%	1639	1894	86.54%	-3.28	-2.99
[illegible]	[illegible]	3345	91.03%	28.57%	1581	1741	90.81%	-0.26	-1.16
[illegible]	[illegible]	2664	87.95%	32.55%	1219	1411	86.39%	-1.38	-1.84
[illegible]	[illegible]	2522	89.37%	30.82%	1010	1169	86.40%	-2.45	-2.49
[illegible]	[illegible]	3294	90.35%	29.53%	707	858	82.40%	-5.44	-4.31
[illegible]	[illegible]	4054	92.25%	26.73%	617	801	77.03%	-9.36	-6.69
[illegible]	[illegible]	3157	91.19%	28.34%	723	878	82.35%	-6.08	-4.7
[illegible]	[illegible]	2113	86.56%	31.90%	690	820	84.15%	-2.9	-2.76
[illegible]	[illegible]	1690	85.38%	35.53%	693	835	82.99%	-1.54	-1.94
[illegible]	[illegible]	1915	87.78%	32.75%	761	941	80.87%	-4.41	-3.68
[illegible]	[illegible]	1912	88.76%	31.59%	763	923	82.67%	-4.01	-3.44



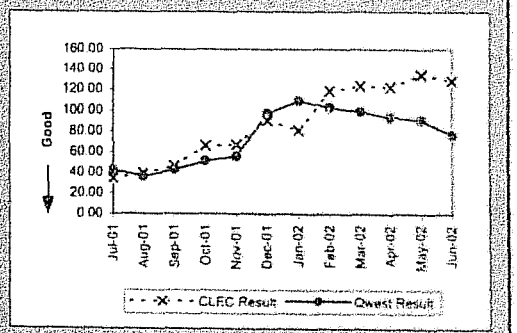
New Service Installation Quality (Percent) (OP-5*) (Parity)

[illegible]	CLEC Num	CLEC Den	CLEC Result	CLEC Std D	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	[illegible]	3560	91.38%	28.07%	1679	1894	88.65%	-3.02	-2.84
[illegible]	[illegible]	3345	92.78%	25.88%	1606	1741	92.25%	-0.67	-1.41
[illegible]	[illegible]	2664	90.58%	29.21%	1255	1411	88.94%	-1.58	-1.96
[illegible]	[illegible]	2522	91.12%	28.45%	1042	1169	89.14%	-1.8	-2.09
[illegible]	[illegible]	3294	92.06%	25.59%	748	858	87.18%	-4.51	-3.74
[illegible]	[illegible]	4054	93.86%	23.96%	645	801	80.52%	-8.72	-6.3
[illegible]	[illegible]	3157	90.32%	24.97%	762	878	86.79%	-5.05	-4.07
[illegible]	[illegible]	2113	90.67%	28.81%	714	820	87.07%	-2.75	-2.67
[illegible]	[illegible]	1690	88.89%	31.42%	723	835	86.59%	-1.64	-2
[illegible]	[illegible]	1915	90.08%	29.90%	795	941	84.48%	-3.88	-3.36
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

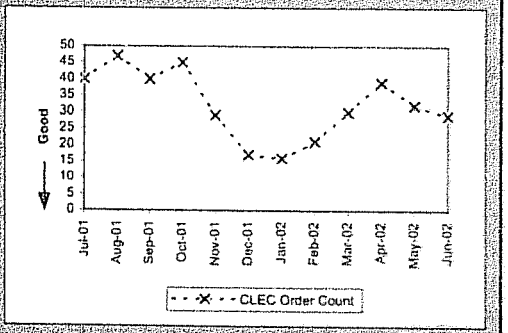
[illegible]	CLEC Num	CLEC Den	CLEC Result	CLEC Std D	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	4346	243	34.62	41.95	7103	167	42.53	-1.57	-1.95
[illegible]	13264	333	39.83	44.53	9565	264	36.23	0.9	-0.45
[illegible]	17393	371	46.88	46.91	12158	282	43.11	0.98	-0.41
[illegible]	20509	307	66.25	55.88	14411	281	51.28	3.28	0.99
[illegible]	23036	351	67.55	58.88	16257	290	56.06	2.43	0.48
[illegible]	24965	297	90.76	61.18	7115	73	97.47	-0.71	-1.43
[illegible]	27734	341	81.33	72.89	7863	72	109.21	-2.72	-2.66
[illegible]	27201	229	118.87	77.44	8663	84	103.13	1.42	-0.14
[illegible]	30467	246	123.83	88.04	9564	96	99.62	2.01	0.22
[illegible]	34577	230	122.73	102.21	11447	122	93.83	2.66	0.62
[illegible]	25035	168	134.76	107.91	10764	118	91.22	3.78	1.3
[illegible]	21504	168	129.19	126.13	10507	136	77.26	4.53	1.75



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Installation

Percent of Pending Orders Delayed for Facilities Reasons UNE P (Centrex) (OP-15B) (Diagnostic)

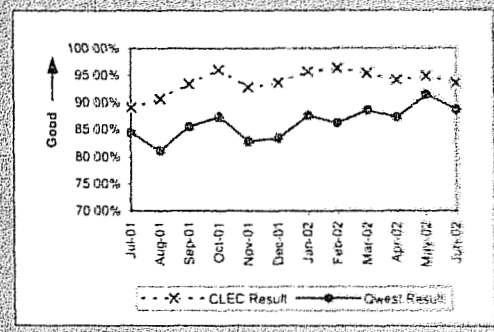
	CLEC Order Count
	40
	47
	40
	45
	29
	17
	16
	21
	30
	39
	32
	29



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Repair

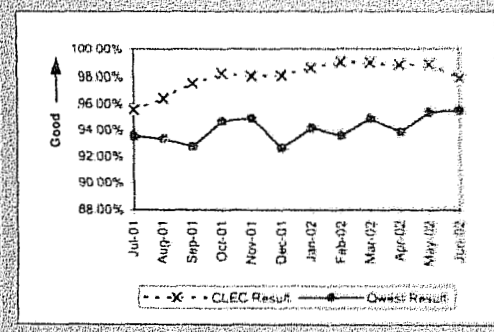
All Troubles Cleared within 24 hours (Percent) (MR-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	[illegible]	1437	89.07%	31.20%	495	586	84.47%	-2.59	-2.58
[illegible]	1264	1394	90.67%	29.08%	619	763	81.13%	-5.42	-4.29
[illegible]	987	1056	93.47%	24.71%	455	532	85.53%	-4.24	-3.58
[illegible]	847	985	96.14%	19.26%	482	552	87.32%	-4.99	-4.03
[illegible]	725	781	92.83%	25.80%	396	478	82.85%	-4.56	-3.77
[illegible]	637	680	93.68%	24.34%	352	422	83.41%	-4.45	-3.71
[illegible]	655	694	95.72%	20.24%	424	484	87.60%	-4.11	-3.5
[illegible]	576	598	96.32%	18.82%	367	426	86.15%	-4.64	-3.82
[illegible]	636	545	95.41%	20.92%	371	419	88.54%	-3.32	-3.02
[illegible]	676	718	94.15%	23.47%	383	439	87.24%	-3.42	-3.08
[illegible]	736	807	94.92%	21.96%	405	443	91.42%	-2.11	-2.28
[illegible]	751	784	93.62%	24.44%	366	413	88.62%	-2.59	-2.58



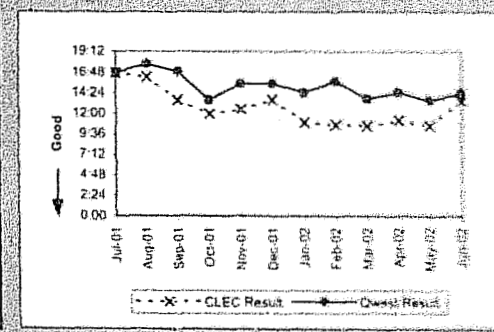
All Troubles Cleared within 48 hours (Percent) (MR-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	1811	1895	95.57%	20.58%	710	759	93.54%	-1.92	-2.17
[illegible]	1749	1814	96.42%	18.59%	873	935	93.37%	-3.04	-2.85
[illegible]	1404	1439	97.57%	15.40%	655	706	92.78%	-4.03	-3.45
[illegible]	1305	1329	98.27%	13.04%	678	716	94.69%	-3.44	-3.09
[illegible]	1037	1057	98.11%	13.62%	582	613	94.94%	-2.85	-2.73
[illegible]	898	915	98.14%	13.50%	517	558	92.65%	-3.92	-3.36
[illegible]	839	849	98.70%	11.31%	583	619	94.18%	-3.65	-3.22
[illegible]	785	792	99.12%	9.36%	498	532	93.61%	-4.02	-3.44
[illegible]	735	742	99.06%	9.67%	503	530	94.91%	-3.32	-3.02
[illegible]	989	1000	98.90%	10.43%	537	572	93.88%	-3.99	-3.43
[illegible]	1043	1052	99.05%	10.17%	560	587	95.40%	-3.29	-3
[illegible]	1009	1030	97.96%	14.13%	536	561	95.54%	-2.23	-2.36



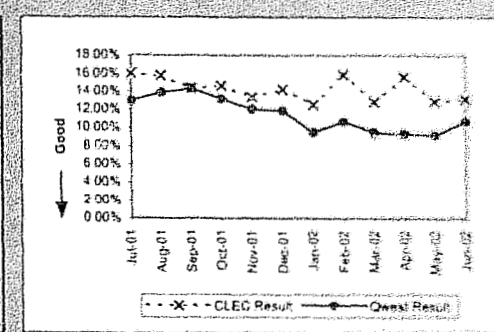
Mean Time to Restore (Hours:Minutes) (MR-6A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	31371:36	1895	16:46	16:05	12748:50	759	16:48	-0.03	-1.02
[illegible]	29575:18	1814	16:18	17:15	16668:16	935	17:50	-1.22	-1.74
[illegible]	19583:57	1439	13:37	12:45	11966:58	706	16:57	-2.37	-2.44
[illegible]	15962:06	1329	12:00	11:06	9751:47	716	13:37	-1.77	-2.08
[illegible]	13284:03	1057	12:32	11:35	9519:49	613	15:32	-2.33	-2.42
[illegible]	12552:35	915	13:42	19:42	8686:03	558	15:34	-1.83	-2.11
[illegible]	9307:49	849	10:57	12:16	8960:28	619	14:29	-2.75	-2.67
[illegible]	8078:30	792	10:44	10:07	8394:54	532	15:47	-3.5	-3.13
[illegible]	7859:57	742	10:35	10:11	7287:57	530	13:45	-2.51	-2.53
[illegible]	11210:04	1000	11:13	10:44	8299:23	572	14:31	-2.41	-2.47
[illegible]	11023:17	1052	10:40	10:51	7981:51	587	13:36	-3.09	-2.88
[illegible]	13638:17	1030	13:26	12:58	8052:48	561	14:21	-0.68	-1.41



Repeat Repeat Report Rate (Percent) (MR-7A) (Parity)-- Dispatches Within MSAs

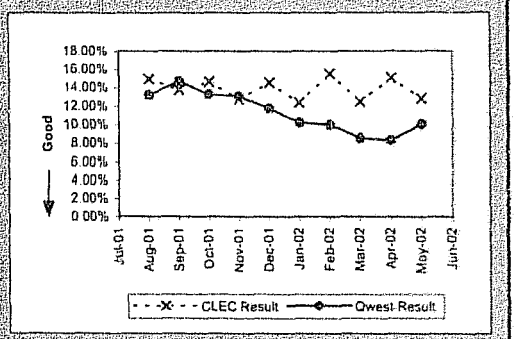
Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	316	1972	16.02%	36.68%	102	788	12.94%	2.18	0.32
[illegible]	297	1879	15.81%	36.48%	134	966	13.87%	1.41	-0.14
[illegible]	214	1488	14.38%	35.09%	105	732	14.34%	0.02	-0.99
[illegible]	203	1372	14.65%	35.36%	98	746	13.14%	0.98	-0.4
[illegible]	147	1100	13.36%	34.03%	76	634	11.99%	0.85	-0.42
[illegible]	133	933	14.26%	34.96%	68	573	11.87%	1.39	-0.15
[illegible]	110	876	12.56%	33.14%	60	632	9.49%	2	0.22
[illegible]	131	823	15.92%	36.58%	59	553	10.67%	3.09	0.88
[illegible]	93	755	12.85%	33.46%	52	548	9.49%	2.04	0.24
[illegible]	155	1017	15.63%	36.32%	55	591	9.31%	4.21	1.56
[illegible]	136	1054	12.92%	33.54%	55	597	9.21%	2.51	0.53
[illegible]	140	1063	13.17%	33.82%	62	581	10.67%	1.57	-0.05



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Repair

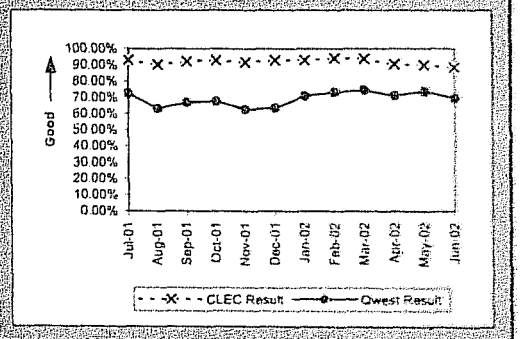
Missed Repair Report Rate (Percent) (MR-7A") (Parity)-- Dispatches Within MSAs

	[illegible]	[illegible]	14.94%	35.65%	106	804	13.18%	1.21	-0.26
	[illegible]	[illegible]	13.75%	34.44%	88	599	14.69%	-0.54	-1.33
	[illegible]	[illegible]	14.65%	35.38%	83	827	13.24%	0.85	-0.48
	[illegible]	[illegible]	12.78%	33.39%	66	506	13.04%	-0.14	-1.09
	[illegible]	[illegible]	14.85%	35.26%	56	477	11.74%	1.43	-0.13
	[illegible]	[illegible]	12.38%	32.94%	55	539	10.20%	1.28	-0.22
	[illegible]	[illegible]	15.52%	36.21%	46	462	9.96%	2.78	0.69
	[illegible]	[illegible]	12.44%	33.05%	39	457	8.53%	2.1	0.28
	[illegible]	[illegible]	15.08%	35.76%	42	506	8.30%	4.45	1.7
	[illegible]	[illegible]	12.62%	33.43%	52	518	10.04%	1.71	0.04



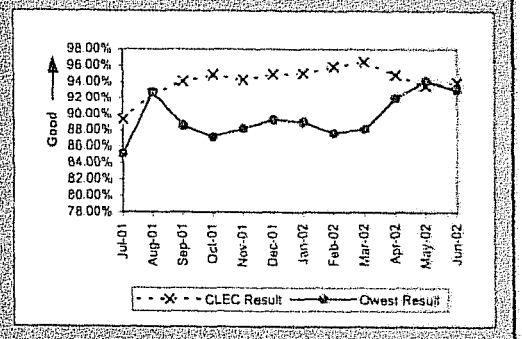
Missed Appointments Met (Percent) (MR-9A) (Parity)-- Dispatches Within MSAs

	[illegible]	[illegible]	93.15%	25.25%	556	764	72.77%	-10.74	-7.53
	[illegible]	[illegible]	90.37%	29.50%	582	919	63.33%	-13.94	-9.47
	[illegible]	[illegible]	92.41%	26.49%	464	693	66.96%	-11.77	-8.15
	[illegible]	[illegible]	93.08%	25.38%	477	702	67.95%	-11.6	-8.05
	[illegible]	[illegible]	91.82%	27.41%	384	612	62.75%	-11.92	-8.25
	[illegible]	[illegible]	93.14%	25.25%	353	555	63.60%	-11.45	-7.96
	[illegible]	[illegible]	93.15%	25.26%	424	597	71.02%	-9.19	-6.59
	[illegible]	[illegible]	94.41%	22.97%	383	522	73.37%	-8.51	-6.17
	[illegible]	[illegible]	93.91%	23.92%	390	523	74.57%	-7.81	-5.75
	[illegible]	[illegible]	90.66%	29.10%	399	560	71.25%	-8.15	-5.95
	[illegible]	[illegible]	90.04%	29.95%	416	562	74.02%	-7.03	-5.27
	[illegible]	[illegible]	86.71%	31.65%	386	555	69.55%	-7.95	-5.83



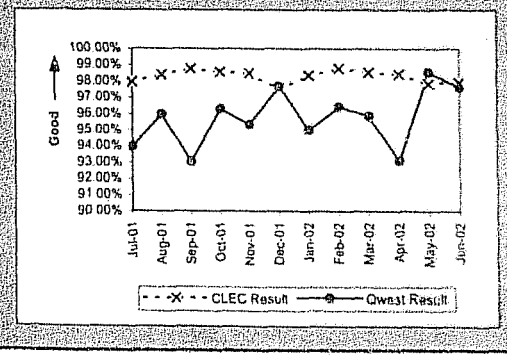
Out of Service Cleared within 24 hours (Percent) (MR-3B) (Parity)-- Dispatches Outside MSAs

	[illegible]	[illegible]	89.38%	30.81%	126	148	85.14%	-1.25	-1.76
	[illegible]	[illegible]	92.53%	26.29%	179	193	92.75%	0.07	-0.96
	[illegible]	[illegible]	94.13%	23.50%	132	149	88.59%	-1.8	-2.09
	[illegible]	[illegible]	94.93%	21.94%	109	125	87.20%	-2.22	-2.35
	[illegible]	[illegible]	94.30%	23.19%	75	85	88.24%	-1.53	-1.93
	[illegible]	[illegible]	95.60%	21.79%	92	103	89.32%	-1.52	-1.92
	[illegible]	[illegible]	95.00%	21.61%	81	91	89.01%	-1.56	-1.95
	[illegible]	[illegible]	96.92%	19.79%	71	81	87.65%	-1.9	-2.16
	[illegible]	[illegible]	96.51%	18.35%	97	110	88.18%	-2.27	-2.38
	[illegible]	[illegible]	94.86%	22.08%	80	87	91.95%	-0.88	-1.53
	[illegible]	[illegible]	93.62%	24.44%	97	103	94.17%	0.15	-0.91
	[illegible]	[illegible]	94.01%	23.73%	93	100	93.00%	-0.35	-1.21



All Trouble Cleared within 48 hours (Percent) (MR-4B) (Parity)-- Dispatches Outside MSAs

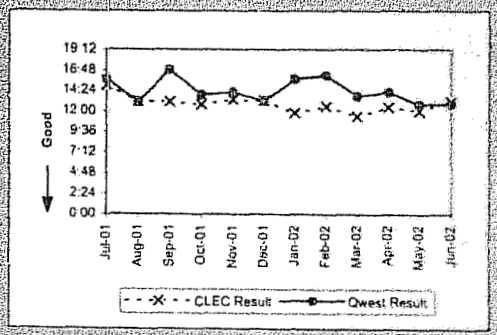
	[illegible]	[illegible]	97.97%	14.12%	187	199	93.97%	-2.05	-2.25
	[illegible]	[illegible]	98.40%	12.56%	238	248	95.97%	-1.65	-2
	[illegible]	[illegible]	96.77%	11.02%	174	187	93.05%	-2.62	-2.59
	[illegible]	[illegible]	96.58%	11.84%	156	162	96.30%	-1.33	-1.81
	[illegible]	[illegible]	98.51%	12.11%	123	129	95.35%	-1.48	-1.9
	[illegible]	[illegible]	97.55%	15.45%	127	130	97.69%	-0.01	-1
	[illegible]	[illegible]	98.37%	12.68%	114	120	95.00%	-1.43	-1.87
	[illegible]	[illegible]	98.61%	10.82%	108	112	96.43%	-1.13	-1.69
	[illegible]	[illegible]	98.57%	11.87%	139	145	95.86%	-1.38	-1.84
	[illegible]	[illegible]	96.46%	12.32%	108	116	93.10%	-2	-2.21
	[illegible]	[illegible]	97.87%	14.43%	139	141	98.58%	0.39	-0.76
	[illegible]	[illegible]	97.95%	14.17%	124	127	97.64%	-0.21	-1.13



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Repair

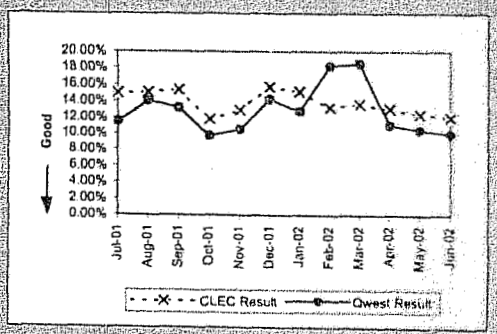
Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	4833.48	390	15:00	12:28	3124:55	199	15:42	-0.47	-1.29
Aug-01	4199.33	324	13:08	12:19	3240:40	248	13:04	0.07	-0.96
Sep-01	5424.28	468	13:07	11:37	3152:39	187	16:52	-0.92	-1.58
Oct-01	5368.25	492	12:49	11:05	2251:29	162	13:54	-0.65	-1.39
Nov-01	5385.01	403	13:23	13:54	1832:55	129	14:13	-0.59	-1.36
Dec-01	3749.53	286	13:15	14:24	1711:22	130	13:10	0.07	-0.96
Jan-02	3515.00	305	11:48	11:21	1891:10	120	15:46	-0.94	-1.57
Feb-02	3174.28	253	12:33	10:31	1812:44	112	16:11	-2.2	-2.34
Mar-02	3994.60	350	11:25	10:52	1995:54	145	13:46	-1.17	-1.71
Apr-02	4462.21	388	12:30	11:19	1650:56	116	14:14	-0.98	-1.6
May-02	5093.39	423	12:03	11:49	1806:58	141	12:49	-0.64	-1.39
Jun-02	6433.40	486	13:11	13:39	1632:26	127	12:51	0.25	-0.85



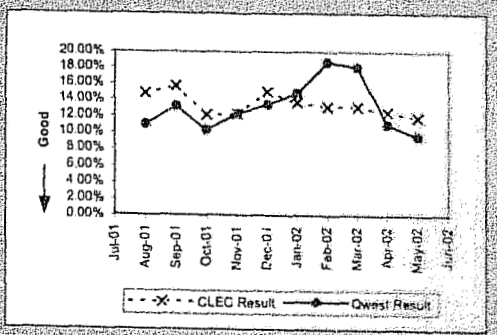
Repair Repeat Report Rate (Percent) (MR-7B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	91	605	15.02%	35.72%	23	200	11.50%	1.24	-0.25
Aug-01	98	649	15.10%	35.81%	36	255	14.12%	0.36	-0.78
Sep-01	73	499	14.63%	36.12%	25	189	13.23%	0.71	-0.57
Oct-01	59	490	11.65%	32.32%	16	164	9.76%	0.72	-0.56
Nov-01	53	408	12.99%	33.62%	14	133	10.53%	0.73	-0.56
Dec-01	46	282	16.75%	38.43%	19	133	14.29%	0.37	-0.77
Jan-02	47	310	15.16%	35.86%	16	125	12.80%	0.62	-0.63
Feb-02	34	256	13.28%	33.94%	21	115	18.26%	-1.15	-1.7
Mar-02	49	358	13.69%	34.37%	27	146	18.49%	-1.26	-1.77
Apr-02	52	396	13.13%	33.77%	13	117	11.11%	0.55	-0.66
May-02	54	433	12.47%	33.04%	15	143	10.49%	0.61	-0.63
Jun-02	56	486	12.10%	32.61%	13	130	10.00%	0.64	-0.61



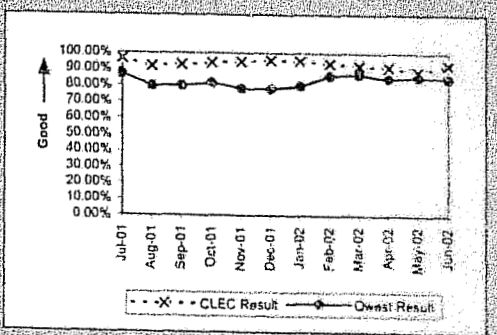
Repair Repeat Report Rate (Percent) (MR-7B*) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	87	586	14.85%	35.51%	22	201	10.95%	1.37	-0.17
Sep-01	70	447	15.66%	36.34%	20	152	13.16%	0.73	-0.55
Oct-01	55	434	12.11%	32.63%	14	136	10.29%	0.56	-0.66
Nov-01	46	378	12.23%	32.77%	13	106	12.26%	-0.01	-1.01
Dec-01	39	260	15.00%	35.71%	15	112	13.39%	0.38	-0.77
Jan-02	31	220	13.70%	34.39%	16	108	14.81%	-0.27	-1.17
Feb-02	30	228	13.16%	33.80%	17	91	18.68%	-1.14	-1.69
Mar-02	43	327	13.15%	33.79%	22	122	18.03%	-1.2	-1.73
Apr-02	47	376	12.50%	33.07%	11	100	11.00%	0.38	-0.77
May-02	49	411	11.92%	32.40%	12	125	9.60%	0.7	-0.58
Jun-02									



Repair Appointments Met (Percent) (MR-9B) (Parity)-- Dispatches Outside MSAs

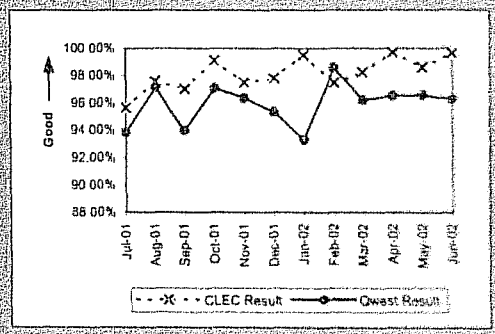
Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	584	606	96.37%	18.70%	173	199	86.93%	-3.43	-3.08
Aug-01	597	649	91.99%	27.15%	202	253	79.84%	-4.08	-3.48
Sep-01	464	499	92.99%	25.54%	150	188	79.79%	-3.84	-3.33
Oct-01	468	498	93.98%	23.79%	133	163	81.60%	-3.54	-3.15
Nov-01	388	408	94.61%	22.59%	104	133	78.20%	-3.98	-3.42
Dec-01	279	292	95.55%	20.62%	102	131	77.86%	-4.05	-3.46
Jan-02	299	310	95.16%	21.46%	99	124	79.84%	-3.59	-3.19
Feb-02	240	256	93.75%	24.21%	99	115	86.09%	-1.97	-2.2
Mar-02	332	358	92.18%	26.85%	125	144	86.81%	-1.61	-1.98
Apr-02	368	396	91.41%	28.02%	98	116	84.48%	-1.81	-2.1
May-02	389	433	89.91%	31.40%	122	143	85.31%	-1.05	-1.64
Jun-02	460	496	92.74%	25.94%	109	129	84.50%	-2.31	-2.4



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Repair

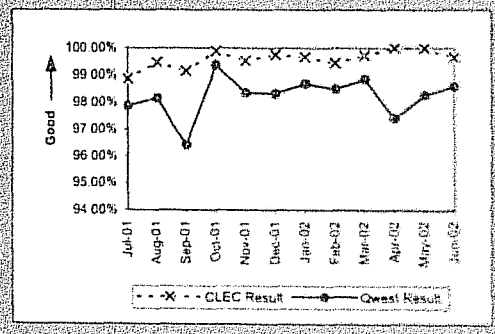
Out of Service Cleared within 24 hours (Percent) (MR-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	618	646	95.67%	20.36%	304	324	93.83%	-1.12	-1.68
[illegible]	582	596	97.61%	15.27%	377	388	97.16%	-0.41	-1.25
[illegible]	425	438	97.03%	16.97%	202	215	93.95%	-1.55	-1.94
[illegible]	446	452	99.12%	9.37%	235	242	97.11%	-1.5	-1.91
[illegible]	352	361	97.51%	15.59%	240	249	96.39%	-0.73	-1.44
[illegible]	359	367	97.82%	14.60%	186	195	95.38%	-1.31	-1.8
[illegible]	412	414	99.52%	6.93%	223	239	93.31%	-3.06	-2.66
[illegible]	432	443	97.52%	15.56%	208	211	98.58%	0.84	-0.49
[illegible]	283	288	98.26%	13.06%	230	239	96.23%	-1.22	-1.74
[illegible]	340	341	99.71%	5.41%	222	230	96.52%	-2.04	-2.24
[illegible]	236	290	98.62%	11.66%	226	234	96.58%	-1.28	-1.78
[illegible]	271	272	99.63%	6.05%	182	189	96.30%	-1.87	-2.13



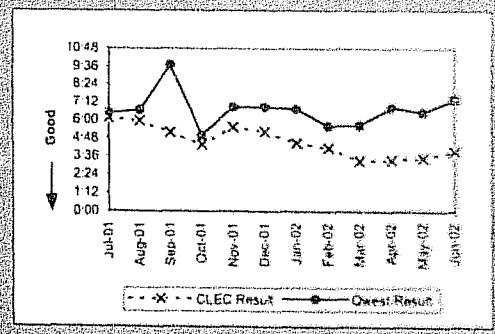
All Troubles Cleared within 48 hours (Percent) (MR-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	1137	1150	98.87%	10.57%	551	563	97.87%	-1.35	-1.82
[illegible]	939	944	99.47%	7.26%	641	653	98.16%	-1.91	-2.16
[illegible]	704	710	99.15%	9.15%	405	420	96.43%	-2.39	-2.45
[illegible]	920	921	99.89%	3.29%	473	476	99.37%	-1.17	-1.71
[illegible]	860	864	99.54%	6.79%	476	484	98.35%	-1.64	-2
[illegible]	824	826	99.76%	4.91%	353	359	98.33%	-1.76	-2.07
[illegible]	926	928	99.68%	5.68%	452	458	98.69%	-1.52	-1.92
[illegible]	923	928	99.46%	7.32%	394	400	98.50%	-1.32	-1.8
[illegible]	757	759	99.74%	5.13%	430	435	98.85%	-1.38	-1.84
[illegible]	827	827	100.00%	0.00%	451	463	97.41%	-2.81	-2.71
[illegible]	706	706	100.00%	0.00%	453	461	98.26%	-2.22	-2.35
[illegible]	591	593	99.66%	5.80%	352	357	98.60%	-1.35	-1.82



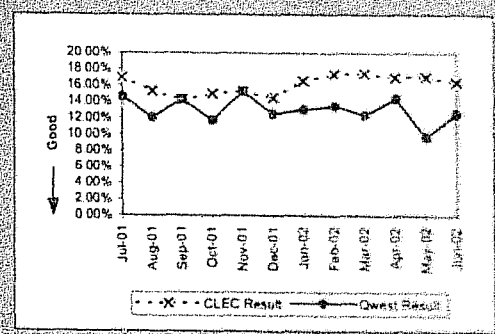
Mean Time to Restore (Hours:Minutes) (MR-6C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	7048:20	1150	6:08	11:23	3626:28	563	6:26	-0.46	-1.28
[illegible]	5623:55	944	5:57	9:26	4355:19	653	6:40	-0.55	-1.34
[illegible]	3982:10	710	5:11	8:42	4080:09	420	9:43	-1.33	-1.81
[illegible]	4050:48	921	4:24	6:23	2383:26	476	5:00	-0.88	-1.54
[illegible]	4801:36	864	5:33	8:37	3323:09	484	6:52	-0.9	-1.55
[illegible]	4318:43	826	5:16	7:58	2476:27	359	6:54	-1.98	-2.21
[illegible]	4172:41	928	4:30	7:33	3085:55	458	6:44	-2.6	-2.58
[illegible]	3667:51	928	4:10	7:54	2254:50	400	5:38	-1.2	-1.73
[illegible]	2514:14	759	3:19	6:00	2464:39	435	5:40	-4.01	-3.44
[illegible]	2756:48	827	3:22	5:41	3160:44	463	6:50	-2.38	-2.45
[illegible]	2469:16	706	3:30	5:35	3011:44	461	6:32	-2.51	-2.53
[illegible]	3352:34	593	3:58	6:56	2650:03	357	7:25	-2.36	-2.43



Repair Repeat Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

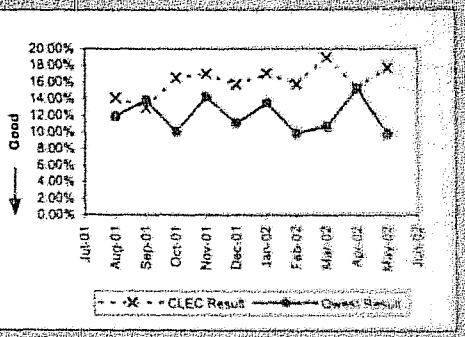
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	195	1150	16.96%	37.53%	82	563	14.56%	1.32	-0.2
[illegible]	145	947	15.31%	36.01%	79	653	12.10%	1.94	0.18
[illegible]	101	710	14.23%	34.93%	60	420	14.29%	-0.03	-1.02
[illegible]	138	921	14.98%	35.69%	56	476	11.76%	1.66	0.01
[illegible]	132	864	15.28%	35.98%	74	484	15.29%	-0.01	-1
[illegible]	126	826	14.53%	35.24%	45	359	12.53%	0.91	-0.45
[illegible]	154	928	16.59%	37.20%	60	458	13.10%	1.7	0.04
[illegible]	162	925	17.46%	37.96%	54	400	13.50%	1.81	0.1
[illegible]	133	759	17.52%	38.02%	54	435	12.41%	2.36	0.43
[illegible]	141	827	17.05%	37.61%	67	463	14.47%	1.21	-0.27
[illegible]	121	706	17.14%	37.68%	45	461	9.76%	3.57	1.17
[illegible]	98	593	16.44%	37.07%	45	357	12.61%	1.61	-0.02



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Repair

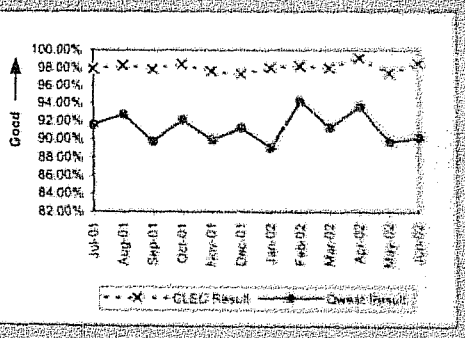
Repair Repeat Report Rate (Percent) (MR-7C*) (Parity)--No Dispatches

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	66	466	14.16%	34.87%	55	462	11.90%	1.02	-0.28
Sep-01	44	340	12.94%	33.57%	41	296	13.85%	-0.33	-1.2
Oct-01	81	489	16.56%	37.18%	35	347	10.09%	2.69	0.64
Nov-01	84	494	17.00%	37.57%	50	352	14.20%	1.1	-0.33
Dec-01	73	464	15.73%	36.41%	25	226	11.06%	1.56	0.01
Jan-02	91	534	17.04%	37.60%	43	318	13.52%	1.37	-0.17
Feb-02	71	450	15.78%	36.45%	23	234	9.83%	2.17	0.32
Mar-02	73	385	18.96%	39.20%	30	281	10.68%	2.94	0.79
Apr-02	61	399	15.29%	35.99%	46	302	15.23%	0.01	-0.99
May-02	61	344	17.73%	38.19%	25	286	9.79%	2.86	0.74
Jun-02									



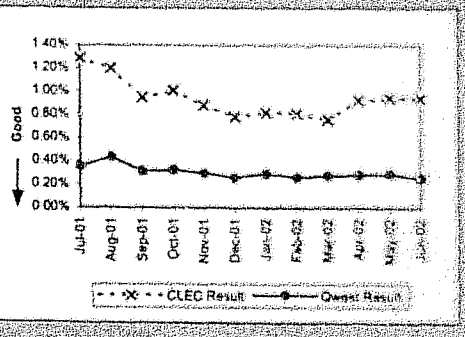
Repair Appointments Met (Percent) (MR-9C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	1126	1150	97.91%	14.29%	469	512	91.60%	-4.28	-3.6
Aug-01	931	947	98.31%	12.89%	526	567	92.77%	-4.03	-3.45
Sep-01	695	710	97.89%	14.38%	333	371	89.76%	-4.19	-3.54
Oct-01	907	921	98.48%	12.24%	376	408	92.16%	-3.95	-3.4
Nov-01	844	864	97.69%	15.04%	375	417	89.93%	-4.32	-3.63
Dec-01	804	826	97.34%	16.10%	301	330	91.21%	-3.32	-3.02
Jan-02	910	928	98.06%	13.79%	351	394	89.09%	-4.79	-3.91
Feb-02	912	928	98.28%	13.02%	328	348	94.25%	-2.75	-2.67
Mar-02	744	759	98.02%	13.92%	346	379	91.29%	-3.8	-3.31
Apr-02	820	827	99.15%	9.16%	396	423	93.62%	-3.79	-3.3
May-02	686	706	97.45%	15.76%	367	409	89.73%	-4.09	-3.49
Jun-02	587	596	98.49%	12.20%	283	314	90.13%	-4.02	-3.44



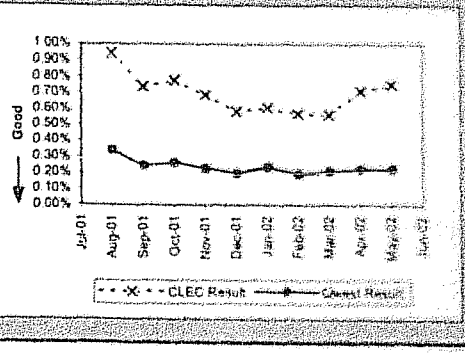
Trouble Rate (Percent) (MR-8) (Parity)

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	3728	289268	1.29%	11.28%	1551	436656	0.36%	65.45	38.79
Aug-01	3475	289779	1.20%	10.88%	1874	430212	0.44%	48.25	28.33
Sep-01	2697	284768	0.95%	9.69%	1341	426464	0.31%	46.69	27.39
Oct-01	2791	277006	1.01%	9.99%	1386	424339	0.33%	48.86	28.7
Nov-01	2372	269127	0.88%	9.35%	1251	421670	0.30%	43.57	25.49
Dec-01	2051	261361	0.78%	8.82%	1065	410554	0.26%	41.27	24.09
Jan-02	2114	257343	0.82%	9.03%	1215	410648	0.30%	38.49	22.4
Feb-02	2007	246927	0.81%	8.98%	1068	406850	0.26%	42.16	24.63
Mar-02	1872	245503	0.76%	8.70%	1129	404607	0.28%	35.83	20.78
Apr-02	2240	241275	0.93%	9.59%	1171	407787	0.29%	46.66	27.37
May-02	2223	235481	0.94%	9.67%	1201	410864	0.29%	46.71	27.33
Jun-02	2165	228504	0.94%	9.67%	1068	412560	0.26%	51.64	30.39



Trouble Rate (Percent) (MR-8*) (Parity)

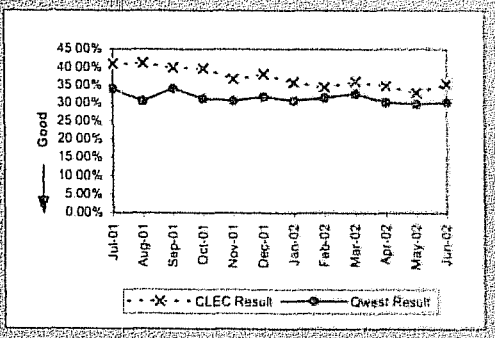
Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	2741	289779	0.95%	9.68%	1467	430212	0.34%	43.18	25.25
Sep-01	2103	284768	0.74%	8.56%	1047	426464	0.25%	41.16	24.03
Oct-01	2158	277006	0.78%	8.79%	1110	424339	0.26%	41.47	24.21
Nov-01	1856	269127	0.69%	8.28%	964	421670	0.23%	39.13	22.79
Dec-01	1526	261361	0.58%	7.62%	815	410554	0.20%	34.67	20.08
Jan-02	1563	257343	0.61%	7.77%	965	410648	0.24%	30.59	17.6
Feb-02	1406	246927	0.57%	7.52%	787	406850	0.19%	33.54	19.39
Mar-02	1385	245503	0.56%	7.49%	860	404607	0.21%	29.84	17.14
Apr-02	1718	241275	0.71%	8.41%	908	407787	0.22%	40.42	23.58
May-02	1777	235481	0.75%	8.65%	929	410864	0.23%	43.05	25.17
Jun-02									



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex Repair

Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)

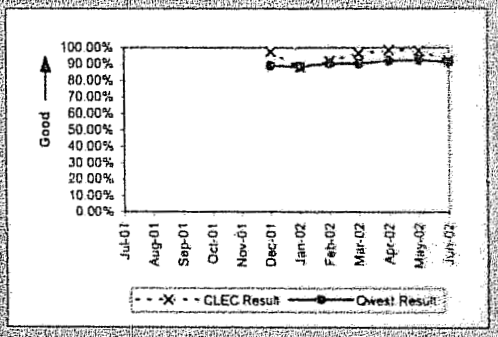
Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	2539	6317	40.98%	49.18%	795	2346	33.89%	6.2	2.77
Aug-01	2436	5911	41.21%	49.22%	627	2701	30.62%	9.9	5.02
Sep-01	1799	4496	40.01%	48.99%	696	2037	34.17%	4.61	1.81
Oct-01	1847	4638	39.82%	48.95%	630	2016	31.25%	6.93	3.22
Nov-01	1393	3755	36.83%	48.23%	555	1806	30.73%	4.62	1.81
Dec-01	1267	3316	38.19%	48.58%	498	1563	31.86%	4.42	1.69
Jan-02	1185	3299	35.92%	47.98%	539	1754	30.73%	3.81	1.31
Feb-02	1062	3069	34.60%	47.57%	493	1561	31.58%	2.09	0.27
Mar-02	1061	2933	36.17%	48.05%	546	1675	32.60%	2.49	0.52
Apr-02	1199	3439	34.86%	47.65%	507	1678	30.21%	3.4	1.07
May-02	1046	3321	33.06%	47.04%	511	1712	29.85%	2.36	0.44
Jun-02	1187	3342	35.52%	47.86%	465	1533	30.33%	3.66	1.22



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Installation

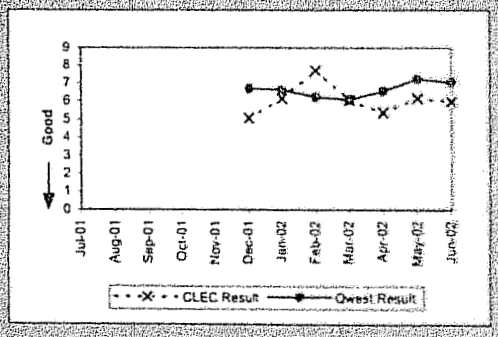
Installation Commitments Met (Percent) (OP-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	78	80	97.50%	15.61%	1133	1271	89.14%	-2.33	-2.42
Jan-02	45	51	88.24%	32.22%	1209	1366	88.51%	0.1	-0.94
Feb-02	43	49	91.84%	27.38%	1203	1329	90.52%	-0.31	-1.19
Mar-02	86	58	96.55%	18.25%	1262	1395	90.47%	-1.55	-1.94
Apr-02	72	73	98.63%	11.62%	1269	1376	92.22%	-1.99	-2.21
May-02	56	59	96.31%	12.91%	1280	1384	92.49%	-1.66	-2.01
Jun-02	49	53	92.45%	26.42%	1153	1263	91.29%	-0.29	-1.18



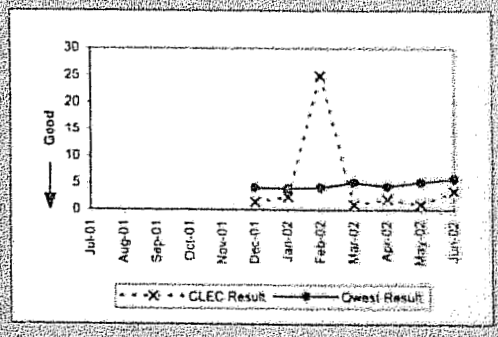
Installation Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	411	81	5.07	1.77	8590	1284	6.69	-1.77	-2.07
Jan-02	315	51	6.14	2.72	9239	1393	6.63	-0.34	-1.21
Feb-02	379	49	7.73	8.58	8378	1346	6.22	1.15	-0.3
Mar-02	351	58	6.05	3.80	8549	1411	6.06	-0.01	-1
Apr-02	393	73	5.38	2.23	9163	1397	6.56	-1.02	-1.62
May-02	376	61	6.16	3.81	10134	1401	7.23	-0.82	-1.5
Jun-02	323	54	5.98	2.97	9101	1289	7.06	-0.87	-1.53



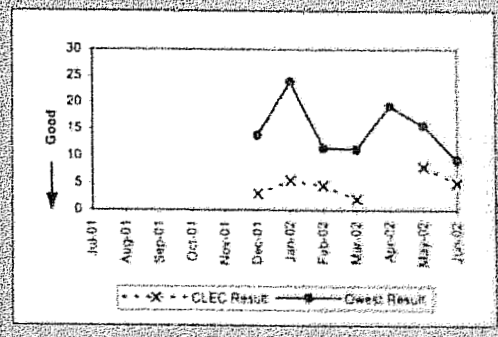
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-1) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	3	2	1.50	0.71	345	83	4.16	-0.69	-1.42
Jan-02	10	4	2.50	1.29	503	124	4.06	-0.62	-1.38
Feb-02	50	2	25.00	32.53	364	87	4.18	2.41	0.46
Mar-02	1	1	1.00		507	98	5.17	-0.55	-1.33
Apr-02	2	1	2.00		351	80	4.39	-0.29	-1.18
May-02	1	1	1.00		385	74	5.20	-0.31	-1.19
Jun-02	7	2	3.50	3.54	422	72	5.86	-0.26	-1.16



Delayed Days for Facility Reasons (Average Days) (OP-6B-1) (Parity)-- Dispatches Within MSAs

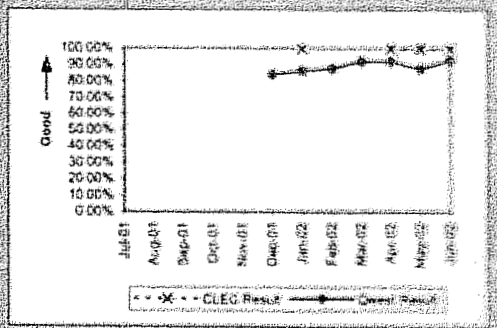
Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	3	1	3.00		840	61	13.77	-0.75	-1.46
Jan-02	11	2	5.50	0.71	934	39	23.95	-0.74	-1.45
Feb-02	9	2	4.50	2.12	483	42	11.50	-0.54	-1.33
Mar-02	2	1	2.00		438	39	11.23	-0.8	-1.48
Apr-02					616	32	19.25		
May-02	8	1	8.00		514	33	15.58	-0.52	-1.31
Jun-02	10	2	5.00	4.24	387	42	9.21	-0.77	-1.47



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Installation

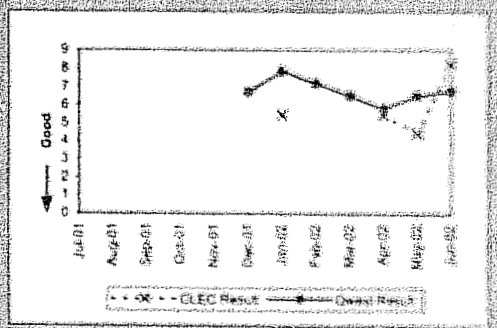
Installation Commitments Met (Percent) (OP-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Deno	CLEC Resu	CLEC Std D	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01					145	172	84.30%		
Jan-02	4	4	100.00%	0.00%	195	226	86.28%	-0.79	-1.48
Feb-02					176	200	88.00%		
Mar-02					203	220	92.27%		
Apr-02	4	4	100.00%	0.00%	203	220	92.27%	-0.57	-1.35
May-02	4	4	100.00%	0.00%	192	219	87.67%	-0.74	-1.45
Jun-02	4	4	100.00%	0.00%	158	170	92.94%	-0.54	-1.33



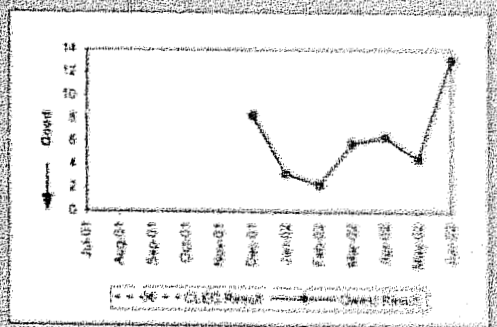
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Deno	CLEC Resu	CLEC Std D	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01					1173	174	6.74		
Jan-02	22	4	5.50	3.87	1793	228	7.86	-0.38	-1.23
Feb-02					1459	202	7.22		
Mar-02					1435	220	6.52		
Apr-02	22	4	5.50	1.00	1294	222	5.83	-0.11	-1.07
May-02	18	4	4.50	1.91	1447	222	6.52	-0.49	-1.3
Jun-02	33	4	8.25	3.30	1174	173	6.79	0.71	-0.57



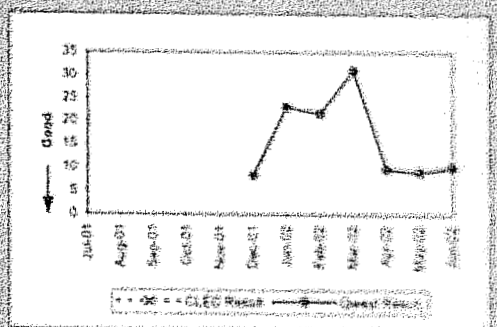
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Deno	CLEC Resu	CLEC Std D	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01					116	14	8.29		
Jan-02					59	18	3.28		
Feb-02					30	13	2.31		
Mar-02					53	9	5.89		
Apr-02					77	12	6.42		
May-02					69	15	4.60		
Jun-02					92	7	13.14		



Delayed Days for Facility Reasons (Average Days) (OP-6B-2) (Parity)-- Dispatches Outside MSAs

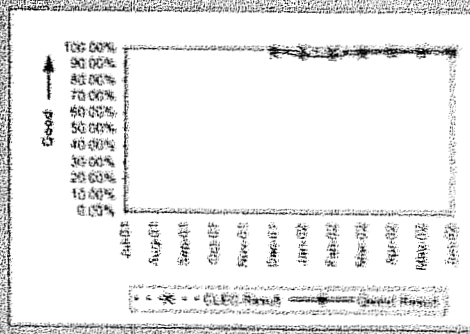
Date	CLEC Num	CLEC Deno	CLEC Resu	CLEC Std D	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01					108	13	8.31		
Jan-02					301	13	23.15		
Feb-02					260	12	21.67		
Mar-02					248	8	31.00		
Apr-02					49	5	9.80		
May-02					110	12	9.17		
Jun-02					61	6	10.17		



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Installation

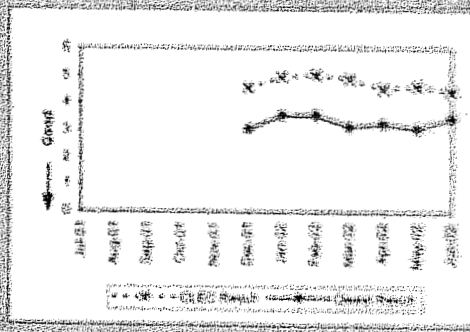
Installation Commitments Met (Percent) (OP-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	86	88	97.73%	14.90%	935	947	98.73%	0.77	-0.53
Jan-02	143	143	100.00%	0.00%	892	925	96.43%	-2.14	-2.3
Feb-02	303	306	99.02%	9.85%	1049	1090	96.24%	-2.26	-2.37
Mar-02	269	275	97.82%	14.61%	967	985	98.17%	0.4	-0.76
Apr-02	195	197	98.98%	10.02%	796	809	98.39%	-0.59	-1.36
May-02	382	385	99.22%	8.79%	1029	1045	98.47%	-1.03	-1.82
Jun-02	313	317	98.74%	11.16%	871	885	98.42%	-0.39	-1.21



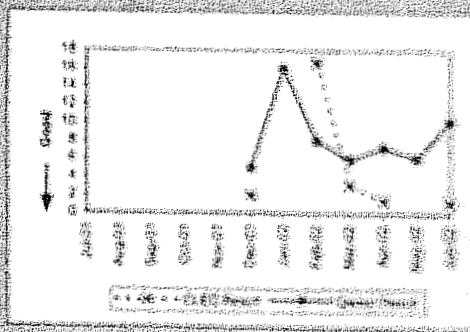
Installation Interval (Average Days) (OP-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	303	66	4.59	1.18	2130	692	3.08	3.72	1.26
Jan-02	478	96	4.98	0.86	2117	593	3.57	7.23	[illegible]
Feb-02	1090	216	5.05	3.30	2859	799	3.58	6.02	2.66
Mar-02	1033	211	4.90	1.01	2081	657	3.17	7.64	3.54
Apr-02	796	175	4.55	0.93	1898	579	3.28	6.75	3.11
May-02	1467	316	4.64	0.86	2444	783	3.12	10.51	5.45
Jun-02	1239	277	4.47	1.25	2105	601	3.50	2.89	[illegible]



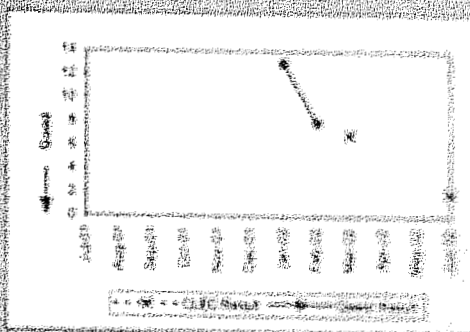
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-3) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	4	2	2.00	1.41	71	14	5.07	-0.73	-1.44
Jan-02					639	40	15.98		
Feb-02	50	3	16.67	26.27	313	39	8.03	0.95	0.42
Mar-02	16	5	3.20	2.77	108	18	6.00	-0.4	-1.04
Apr-02	3	2	1.50	0.71	95	13	7.31	-0.85	-1.54
May-02					105	17	6.18		
Jun-02	4	3	1.33	0.58	143	14	10.21	-0.5	-1.1



Delayed Days for Facility Reasons (Average Days) (OP-6B-3) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01									
Jan-02					13	1	13.00		
Feb-02					16	2	8.00		
Mar-02	7	1	7.00						
Apr-02									
May-02									
Jun-02	2	1	2.00						



CONTINUATION

[5]

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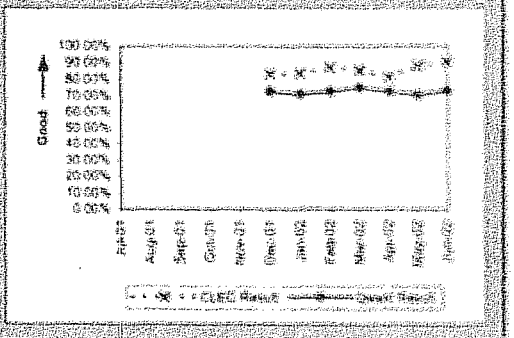
Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Installation

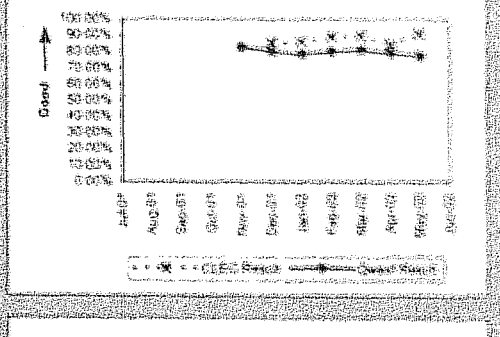
New Service Installation Quality (Percent) (OP-5) (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	71	85	83.53%	37.09%	1928	2652	72.70%	-2.21	-2.34
Jan-02	154	184	83.70%	36.94%	1760	2483	70.88%	-3.69	-3.84
Feb-02	242	277	87.36%	33.22%	1891	2601	72.70%	-5.21	-4.17
Mar-02	295	344	85.76%	34.95%	1972	2632	74.92%	-4.36	-3.65
Apr-02	248	304	81.58%	38.77%	1832	2527	72.50%	-3.35	-3.04
May-02	319	362	88.12%	32.35%	1796	2554	70.32%	-6.94	-5.22
Jun-02	376	413	91.04%	28.56%	1840	2512	73.25%	-7.57	-5.6



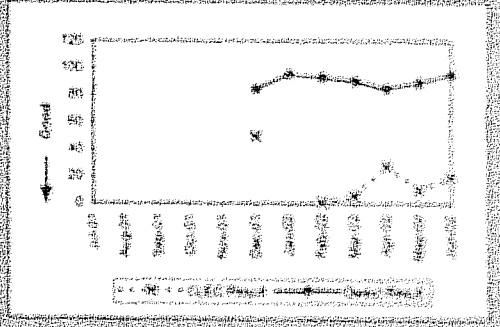
New Service Installation Quality (Percent) (OP-5") (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01					2711	3278	82.70%		
Dec-01	73	85	85.88%	34.82%	2124	2652	80.09%	-1.32	-1.8
Jan-02	159	184	86.41%	34.27%	1954	2483	78.70%	-2.47	-2.9
Feb-02	248	277	89.53%	30.62%	2081	2601	80.01%	-3.77	-3.29
Mar-02	310	344	90.12%	29.84%	2131	2632	80.97%	-4.07	-3.47
Apr-02	257	304	84.54%	36.15%	1996	2527	78.99%	-2.25	-2.36
May-02	330	362	91.16%	28.39%	1980	2554	77.53%	-5.82	-4.54
Jun-02									



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

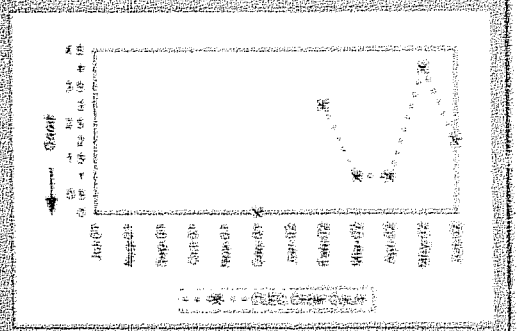
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	50	1	50.00		19400	229	84.72	-0.41	-1.25
Jan-02					21701	227	95.60		
Feb-02	3	4	0.75	0.50	24170	260	92.96	-2.01	-2.22
Mar-02	6	1	6.00		28393	315	90.14	-0.88	-1.54
Apr-02	28	1	28.00		31352	369	84.96	-0.62	-1.38
May-02	114	11	10.36	14.01	34267	384	89.24	-2.6	-2.53
Jun-02	217	11	19.73	19.51	34677	365	95.29	-9.37	-2.44



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Installation

Count of Pending Orders Delayed for Facilities Reasons UNP P (Centrex 21) (OP-15D) (Diagnostic)

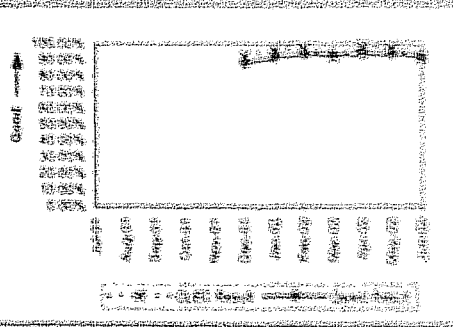
Date	CLEC Order Count
Jul-01	
Aug-01	
Sep-01	
Oct-01	
Nov-01	
Dec-01	
Jan-02	
Feb-02	
Mar-02	
Apr-02	
May-02	
Jun-02	



Checklist #2 - Unbundled Network Element - Platforms (UNE-P) Centrex 21 Repair

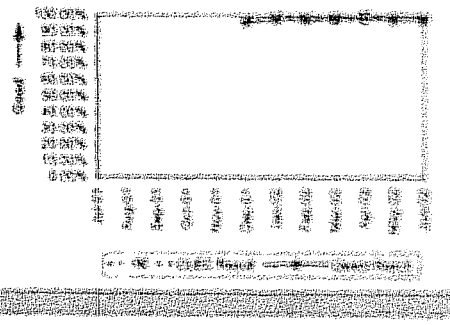
Out of Service Cleared within 24 hours (Percent) (MR-3A) (Parity) -- Dispatched Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	64	69	92.75%	25.83%	1782	1933	88.05%	-1.16	-1.72
Jan-02	62	64	96.88%	17.40%	1650	1809	91.67%	-1.48	-1.9
Feb-02	50	51	98.04%	13.86%	1579	1682	93.88%	-1.22	-1.54
Mar-02	46	50	92.00%	27.13%	1551	1662	93.32%	-0.41	-0.75
Apr-02	72	73	98.63%	11.62%	1561	1669	93.53%	-1.71	-2.05
May-02	77	79	97.47%	15.71%	1815	1935	93.80%	-1.31	-1.84
Jun-02	64	70	91.43%	27.99%	1760	1911	92.81%	-0.16	-0.3



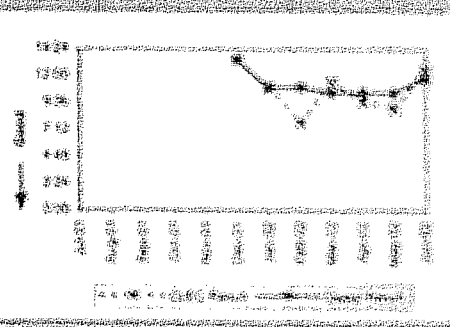
All Troubles Cleared within 48 hours (Percent) (MR-4A) (Parity) -- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	93	96	96.88%	17.40%	2479	2572	96.38%	-0.25	-0.55
Jan-02	84	85	98.82%	10.78%	2378	2432	97.78%	-0.82	-0.98
Feb-02	63	64	98.44%	12.40%	2142	2203	97.46%	-0.43	-0.7
Mar-02	72	73	98.63%	11.62%	2173	2217	98.02%	-0.37	-0.62
Apr-02	112	112	100.00%	0.00%	2238	2287	97.86%	-0.63	-0.63
May-02	103	105	98.10%	13.67%	2543	2596	97.96%	-0.1	-0.66
Jun-02	96	98	97.96%	14.14%	2493	2553	97.65%	-0.1	-0.65



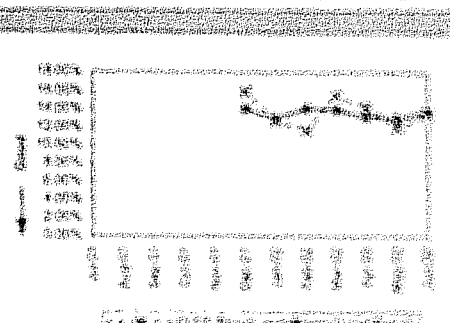
Mean Time to Restore (Hours:Minutes) (MR-6A) (Parity) -- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	1285:51	96	13:24	19:35	34644:44	2572	13:28	-0.04	-0.05
Jan-02	942:05	85	11:05	16:23	26584:51	2432	10:56	0.22	0.23
Feb-02	504:13	64	7:53	8:29	24155:54	2203	10:58	-1.54	-1.98
Mar-02	838:44	73	11:29	11:07	23334:14	2217	10:32	0.66	0.8
Apr-02	1094:12	112	9:46	9:22	24097:57	2287	10:32	-0.58	-0.74
May-02	958:46	105	9:08	10:19	27276:46	2596	10:30	-1.09	-1.66
Jun-02	1238:30	98	12:38	12:07	30124:40	2553	11:48	0.51	0.66



Repair Repeat Report Rate (Percent) (MR-7A) (Parity) -- Dispatches Within MSAs

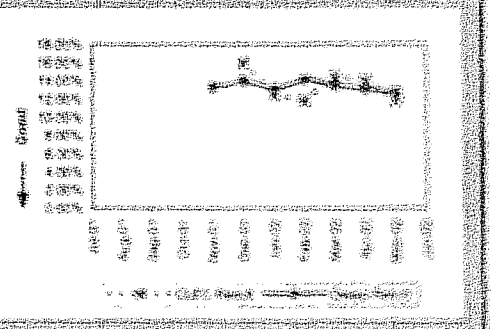
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	16	100	16.00%	36.66%	374	2585	14.47%	0.56	0.84
Jan-02	11	86	12.79%	33.40%	327	2408	13.58%	-0.67	-1.04
Feb-02	8	68	11.76%	32.22%	317	2246	14.11%	-0.93	-1.33
Mar-02	12	77	15.58%	36.27%	317	2260	14.03%	0.41	0.75
Apr-02	16	112	14.29%	34.99%	308	2321	13.24%	0.34	0.69
May-02	13	108	12.04%	32.54%	344	2639	13.04%	-0.3	-0.59
Jun-02	14	103	13.59%	34.27%	361	2613	13.82%	-0.06	-0.08



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Retail

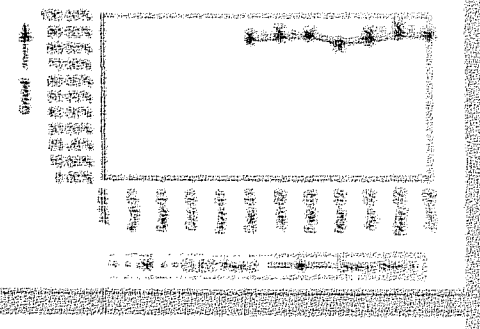
Repair Repeat Report Rate (Percent) (MR-7A*) (Parity) – Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Qwest Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01					311	2325	13.38%		
Dec-01	12	75	16.00%	36.66%	315	2247	14.02%	-0.31	-0.69
Jan-02	9	72	12.50%	33.07%	282	2150	13.12%	-0.13	-0.87
Feb-02	7	59	11.86%	32.34%	256	1874	13.66%	-0.53	-0.47
Mar-02	10	69	14.49%	35.20%	266	1965	13.54%	-0.28	-0.72
Apr-02	14	99	14.14%	34.84%	273	2079	13.13%	-0.31	-0.69
May-02	11	93	11.83%	32.29%	302	2366	12.76%	-0.21	-0.79
Jun-02									



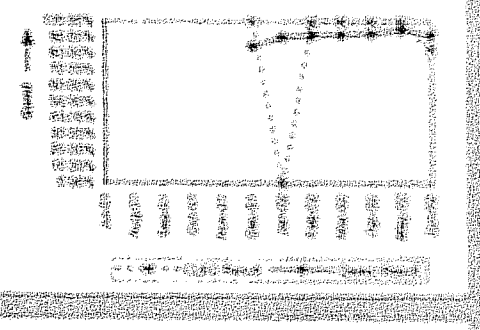
Repair Appointments Met (Percent) (MR-9A) (Parity) – Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Qwest Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	89	100	89.00%	31.29%	3273	3655	89.57%	-0.18	-0.82
Jan-02	79	86	91.86%	27.34%	2787	3066	90.89%	-0.38	-0.62
Feb-02	61	68	89.71%	30.39%	1980	2218	89.27%	-0.29	-0.71
Mar-02	63	77	81.82%	38.57%	1898	2280	83.25%	-0.53	-0.47
Apr-02	101	112	90.18%	29.76%	1990	2327	85.52%	-0.13	-0.87
May-02	102	108	94.44%	22.91%	2341	2639	88.71%	-0.39	-0.61
Jun-02	92	103	89.32%	30.89%	2302	2613	88.10%	-0.34	-0.66



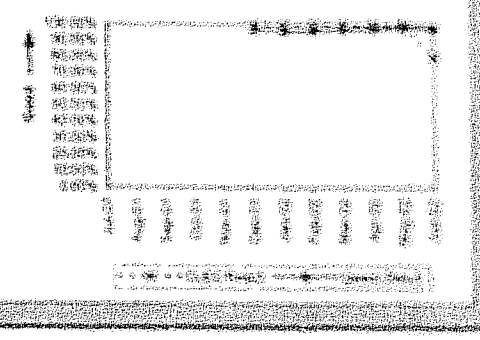
Out of Service Cleared within 24 hours (Percent) (MR-3B) (Parity) – Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Qwest Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	1	1	100.00%	0.00%	218	252	84.92%	-0.42	-0.58
Jan-02	0	1	0.00%	0.00%	255	283	90.46%	-1.68	-0.32
Feb-02	3	3	100.00%	0.00%	198	218	91.67%	-0.53	-0.47
Mar-02	1	1	100.00%	0.00%	226	246	91.87%	-0.51	-0.49
Apr-02	3	3	100.00%	0.00%	227	245	92.65%	-0.40	-0.60
May-02	1	1	100.00%	0.00%	262	286	91.61%	-0.51	-0.49
Jun-02	5	6	83.33%	37.27%	252	275	91.64%	-0.66	-0.34



All Troubles Cleared within 48 hours (Percent) (MR-4B) (Parity) – Dispatches Outside MSAs

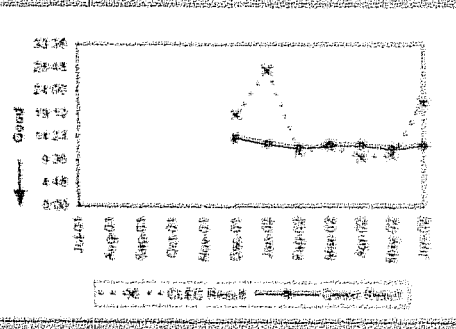
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Denom	Qwest Result	Qwest Z Score	Parity Score
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	2	2	100.00%	0.00%	348	379	91.82%	-0.35	-0.65
Jan-02	1	1	100.00%	0.00%	398	400	95.50%	-0.52	-0.48
Feb-02	4	4	100.00%	0.00%	313	324	96.60%	-0.57	-0.43
Mar-02	2	2	100.00%	0.00%	337	347	97.12%	-0.34	-0.66
Apr-02	3	3	100.00%	0.00%	345	354	97.46%	-0.28	-0.72
May-02	3	3	100.00%	0.00%	391	398	98.24%	-0.23	-0.77
Jun-02	8	10	80.00%	40.00%	381	390	97.69%	0.31	0.31



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Repair

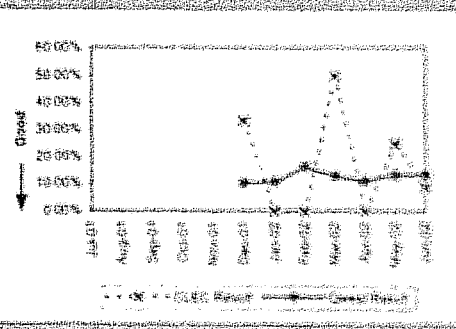
Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	38:23	2	19:11	0:36	5105:30	359	14:13	0.69	-0.58
Jan-02	28:26	1	28:26		5247:27	400	13:07	1.45	-0.12
Feb-02	45:56	4	11:29	8:14	3984:30	324	12:18	-0.11	-1.07
Mar-02	24:58	2	12:29	8:19	4469:18	347	12:53	-0.03	-1.02
Apr-02	31:09	3	10:23	9:18	4559:42	358	12:44	-0.27	-1.16
May-02	32:22	3	10:47	13:09	4802:13	398	12:04	-0.19	-1.11
Jun-02	216:04	10	21:36	28:51	4941:16	390	12:40	1.73	-0.05



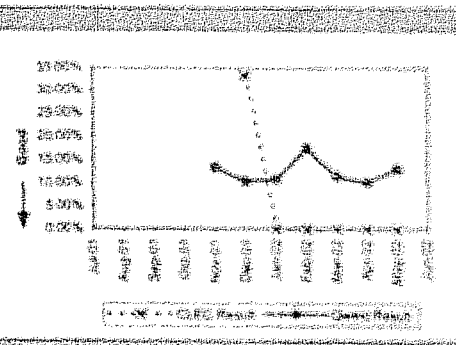
Repair Repeat Report Rate (Percent) (MR-7B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	1	3	33.33%	47.14%	37	362	10.22%	1.02	-0.35
Jan-02	0	1	0.00%	0.00%	44	407	10.81%	-0.35	-1.29
Feb-02	0	4	0.00%	0.00%	54	329	16.41%	-0.88	-1.64
Mar-02	1	2	50.00%	50.00%	45	350	12.86%	1.10	-0.33
Apr-02	0	3	0.00%	0.00%	41	367	11.17%	-0.61	-1.37
May-02	1	4	25.00%	43.30%	54	403	13.40%	0.62	-0.63
Jun-02	1	11	9.09%	28.75%	53	395	13.42%	-0.42	-1.25



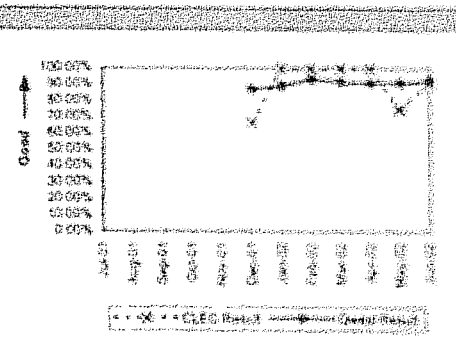
Repair Repeat Report Rate (Percent) (MR-7B*) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01					47	348	13.51%		
Dec-01	1	3	33.33%	47.14%	30	288	10.42%		-0.39
Jan-02	0	1	0.00%	0.00%	35	321	10.90%	-0.35	-1.21
Feb-02	0	3	0.00%	0.00%	46	262	17.56%	-0.79	-1.48
Mar-02	0	1	0.00%	0.00%	33	287	11.50%	-0.36	-1.25
Apr-02	0	3	0.00%	0.00%	32	312	10.26%	-0.55	-1.39
May-02	0	1	0.00%	0.00%	46	352	13.07%	-0.39	-1.24
Jun-02									



Repair Appointments Met (Percent) (MR-9B) (Parity)-- Dispatches Outside MSAs

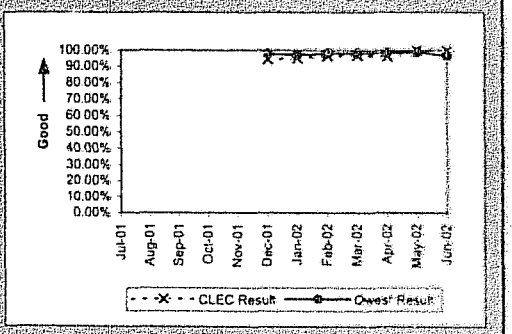
Date	CLEC Num	CLEC Denc	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	2	3	66.67%	47.14%	316	362	87.29%	0.97	-0.47
Jan-02	1	1	100.00%	0.00%	363	407	89.19%	-0.35	-1.21
Feb-02	4	4	100.00%	0.00%	308	329	93.62%	-0.52	-1.32
Mar-02	2	2	100.00%	0.00%	320	350	91.43%	-0.43	-1.28
Apr-02	3	3	100.00%	0.00%	334	367	91.01%	-0.54	-1.33
May-02	3	4	75.00%	43.30%	367	403	91.07%	0.91	-0.44
Jun-02	10	11	90.91%	28.75%	365	395	92.41%	0.24	-0.86



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Repair

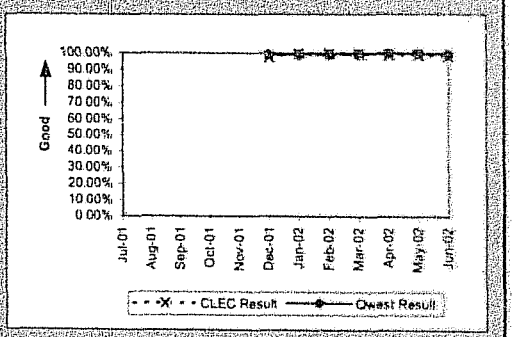
Out of Service Cleared within 24 hours (Percent) (MR-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	17	18	94.44%	22.91%	665	700	97.86%	0.85	-0.48
Jan-02	20	21	95.24%	21.30%	748	770	97.14%	0.52	-0.68
Feb-02	28	29	96.55%	18.25%	726	741	97.98%	0.53	-0.68
Mar-02	32	33	96.97%	17.14%	757	771	98.18%	0.51	-0.69
Apr-02	26	27	96.30%	18.89%	658	669	98.36%	0.74	-0.55
May-02	20	20	100.00%	0.00%	690	699	98.71%	-0.5	-1.31
Jun-02	32	32	100.00%	0.00%	673	696	96.70%	-1.02	-1.62



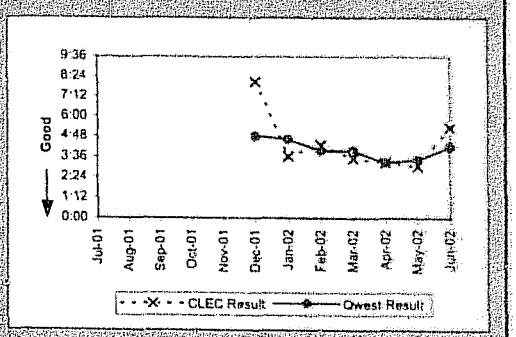
All Troubles Cleared within 48 hours (Percent) (MR-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	44	45	97.78%	14.74%	1448	1462	99.04%	0.77	-0.53
Jan-02	60	60	100.00%	0.00%	1722	1736	99.19%	-0.69	-1.42
Feb-02	69	69	100.00%	0.00%	1654	1666	99.28%	-0.69	-1.42
Mar-02	103	103	100.00%	0.00%	1716	1727	99.36%	-0.79	-1.48
Apr-02	98	99	98.99%	10.00%	1546	1550	99.74%	1.05	-0.36
May-02	98	99	98.99%	10.00%	1573	1579	99.62%	0.82	-0.5
Jun-02	89	91	97.80%	14.66%	1469	1479	99.32%	1.38	-0.16



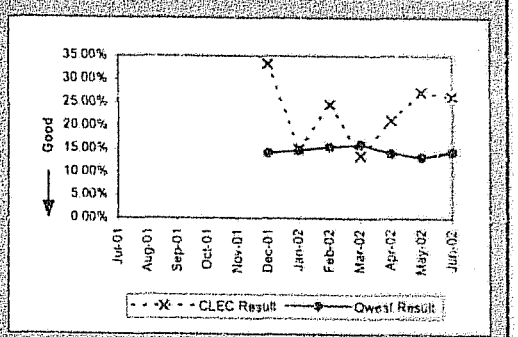
Mean Time to Restore (Hours:Minutes) (MR-6C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	353:48	45	8:05	15:13	7039:43	1462	4:49	1.59	-0.03
Jan-02	219:08	60	3:39	6:06	6006:31	1736	4:37	-0.65	-1.39
Feb-02	295:29	69	4:17	7:18	6619:03	1666	3:58	0.48	-0.71
Mar-02	362:11	103	3:31	6:15	6812:52	1727	3:57	-0.45	-1.28
Apr-02	326:21	99	3:18	8:27	5097:09	1550	3:17	0.08	-0.95
May-02	303:30	99	3:04	7:31	5427:08	1579	3:26	-0.43	-1.26
Jun-02	486:32	91	5:21	13:00	6217:32	1479	4:12	1.1	-0.33



Repair Repeat Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

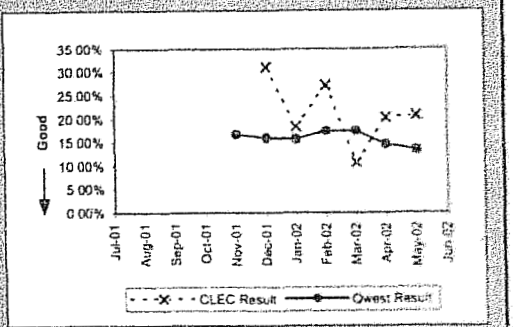
Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	15	45	33.33%	47.14%	207	1462	14.16%	3.19	0.94
Jan-02	9	60	15.00%	35.71%	256	1736	14.75%	0.09	-0.95
Feb-02	17	69	24.64%	43.09%	257	1666	15.43%	1.96	0.19
Mar-02	14	103	13.59%	34.27%	277	1727	16.04%	-0.66	-1.4
Apr-02	21	99	21.21%	40.88%	218	1550	14.06%	1.88	0.14
May-02	27	99	27.27%	44.54%	209	1579	13.24%	3.56	1.17
Jun-02	24	91	26.37%	44.07%	212	1482	14.31%	2.91	0.77



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Repair

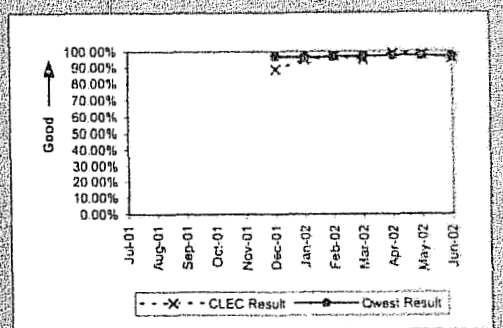
Repair Repeat Report Rate (Percent) (MR-7C*) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01					148	886	16.70%		
Dec-01	9	29	31.03%	46.26%	117	734	15.94%	1.99	0.21
Jan-02	7	38	18.42%	38.77%	151	961	15.71%	0.47	-0.71
Feb-02	12	44	27.27%	44.54%	152	873	17.41%	1.6	-0.03
Mar-02	6	56	10.71%	30.93%	162	932	17.38%	-1.28	-1.78
Apr-02	13	64	20.31%	40.23%	116	798	14.54%	1.22	-0.26
May-02	11	53	20.75%	40.56%	116	861	13.47%	1.43	-0.13
Jun-02									



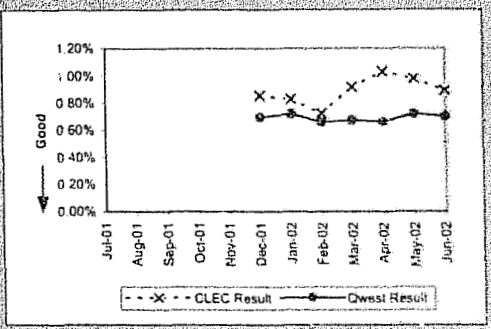
Repair Appointments Met (Percent) (MR-9C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	40	45	88.89%	31.43%	1418	1462	96.99%	2.45	0.49
Jan-02	57	60	95.00%	21.79%	1669	1736	96.14%	0.49	-0.7
Feb-02	62	69	97.10%	16.78%	1613	1666	96.82%	-0.13	-1.08
Mar-02	98	103	95.15%	21.49%	1673	1727	96.87%	0.95	-0.42
Apr-02	96	99	96.99%	10.00%	1512	1550	97.55%	-0.9	-1.55
May-02	97	99	97.98%	14.07%	1539	1579	97.47%	-0.32	-1.19
Jun-02	47	51	95.60%	20.50%	1433	1482	96.69%	0.59	-0.64



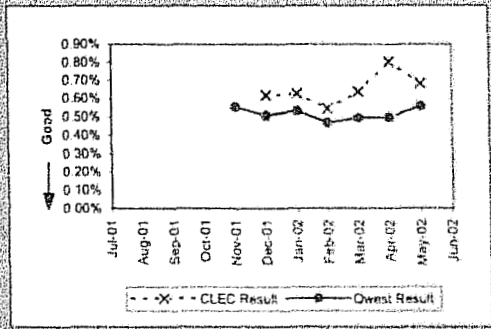
Trouble Rate (Percent) (MR-8) (Parity)

Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	148	17322	0.85%	9.20%	4479	644349	0.70%	2.49	0.51
Jan-02	147	17705	0.83%	9.07%	4649	644124	0.72%	1.68	0.02
Feb-02	141	19413	0.73%	8.49%	4241	642615	0.66%	1.13	-0.32
Mar-02	182	19779	0.92%	9.58%	4337	643795	0.67%	4.17	1.54
Apr-02	214	20685	1.03%	10.12%	4244	641766	0.66%	6.52	2.96
May-02	211	21517	0.98%	9.85%	4621	641029	0.72%	4.43	1.69
Jun-02	205	22988	0.89%	9.40%	4490	640270	0.70%	3.4	1.07



Trouble Rate (Percent) (MR-8*) (Parity)

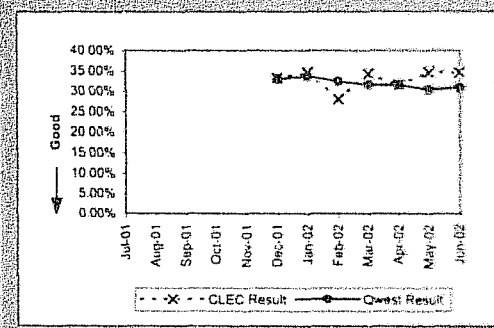
Date	CLEC Num	CLEC Den	CLEC Result	CLEC Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01					3559	644876	0.55%		
Dec-01	107	17322	0.62%	7.84%	3269	644349	0.51%	2.02	0.23
Jan-02	111	17705	0.63%	7.89%	3432	644124	0.53%	1.7	0.03
Feb-02	106	19413	0.55%	7.37%	3009	642615	0.47%	1.56	-0.05
Mar-02	128	19779	0.64%	7.96%	3164	643795	0.49%	2.81	0.71
Apr-02	156	20685	0.80%	8.92%	3189	641766	0.50%	6.15	2.74
May-02	147	21517	0.68%	8.24%	3579	641029	0.56%	2.42	0.47
Jun-02									



Checklist #2 - Unbundled Network Element - Platform (UNE-P) Centrex 21 Repair

Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)

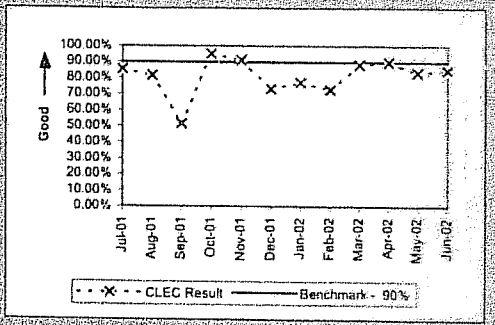
	CLEC Num	CLEC Den	CLEC Res	CLEC Sig D	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01	74	222	33.33%	47.14%	2211	6690	33.05%	0.1	-0.94
Jan-02	76	225	34.67%	47.59%	2368	7017	33.75%	0.29	-0.82
Feb-02	55	196	28.06%	44.93%	2042	6283	32.50%	-1.31	-1.79
Mar-02	95	277	34.30%	47.47%	2007	6344	31.64%	0.93	-0.43
Apr-02	99	313	31.63%	46.50%	1960	6204	31.59%	0.02	-0.99
May-02	112	323	34.67%	47.59%	2012	6633	30.33%	1.64	0
Jun-02	109	314	34.71%	47.61%	2000	6490	30.82%	1.45	-0.12



Checklist #2 - Enhanced Extended Loops (EELs) Installation

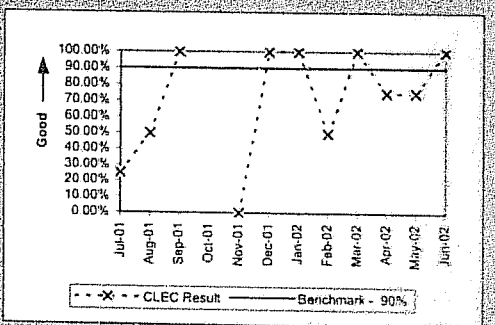
Installation Commitments Met (Percent) (OP-3D) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	6	7	85.71%	34.99%
Aug-01	54	66	81.82%	38.57%
Sep-01	14	27	51.85%	49.97%
Oct-01	20	21	95.24%	21.30%
Nov-01	52	57	91.23%	28.29%
Dec-01	22	30	73.33%	44.22%
Jan-02	24	31	77.42%	41.81%
Feb-02	35	48	72.92%	44.44%
Mar-02	77	87	88.51%	31.90%
Apr-02	163	181	90.06%	29.93%
May-02	118	141	83.69%	36.95%
Jun-02	109	128	85.16%	35.55%



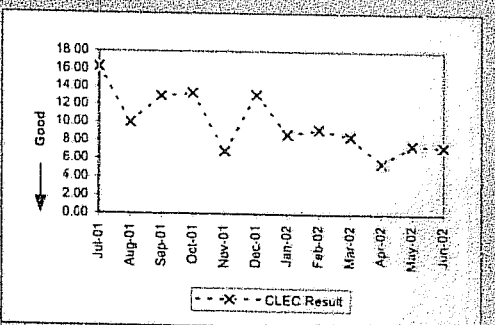
Installation Commitments Met (Percent) (OP-3E) (Diagnostic)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	1	4	25.00%	43.30%
Aug-01	1	2	50.00%	50.00%
Sep-01	3	3	100.00%	0.00%
Oct-01				
Nov-01	0	1	0.00%	0.00%
Dec-01	3	3	100.00%	0.00%
Jan-02	1	1	100.00%	0.00%
Feb-02	2	4	50.00%	50.00%
Mar-02	2	2	100.00%	0.00%
Apr-02	6	8	75.00%	43.30%
May-02	12	16	75.00%	43.30%
Jun-02	20	20	100.00%	0.00%



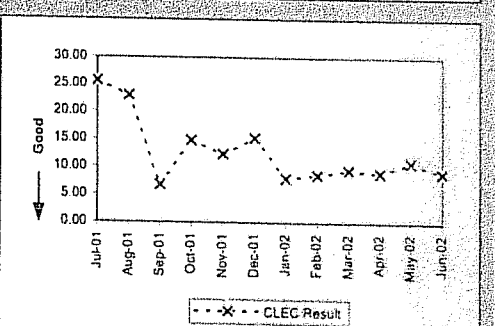
Installation Interval (Average Days) (OP-4D) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	486	30	16.27	13.09
Aug-01	812	81	10.02	13.40
Sep-01	403	31	13.00	8.06
Oct-01	560	42	13.33	13.10
Nov-01	441	64	6.89	11.39
Dec-01	539	41	13.15	20.68
Jan-02	350	40	8.75	7.48
Feb-02	465	50	9.30	8.53
Mar-02	648	76	8.53	8.28
Apr-02	1006	180	5.59	5.60
May-02	1000	132	7.58	5.82
Jun-02	1182	159	7.43	3.47



Installation Interval (Average Days) (OP-4E) (Diagnostic)-- Interval Zone Two

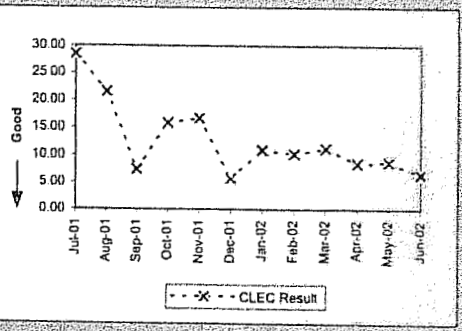
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	205	8	25.62	19.26
Aug-01	69	3	23.00	26.00
Sep-01	34	5	6.80	1.64
Oct-01	89	6	14.83	9.04
Nov-01	37	3	12.33	4.04
Dec-01	61	4	15.25	8.62
Jan-02	24	3	8.00	1.00
Feb-02	43	5	8.60	2.70
Mar-02	19	2	9.50	6.36
Apr-02	45	5	9.00	4.69
May-02	109	10	10.90	5.67
Jun-02	126	14	9.00	7.27



Checklist #2 - Enhanced Extended Loops (EELs) Installation

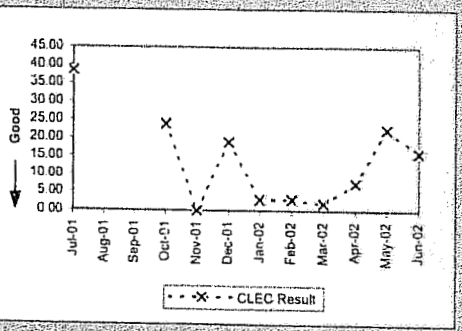
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	228	8	28.50	7.25
Aug-01	151	7	21.57	13.28
Sep-01	45	6	7.50	7.56
Oct-01	127	8	15.88	16.88
Nov-01	134	8	16.75	15.63
Dec-01	35	6	5.83	4.22
Jan-02	77	7	11.00	7.33
Feb-02	186	18	10.33	9.80
Mar-02	204	18	11.33	11.49
Apr-02	215	25	8.60	8.84
May-02	265	30	8.83	7.06
Jun-02	171	26	6.58	5.93



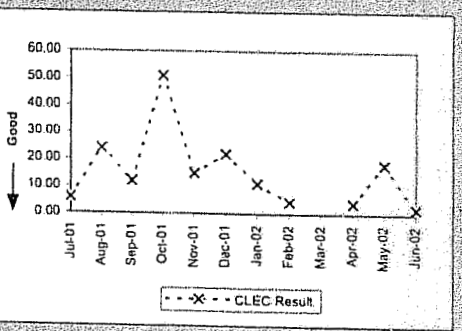
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Diagnostic)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	77	2	38.50	4.95
Aug-01				
Sep-01				
Oct-01	24	1	24.00	
Nov-01	0	2	0.00	0.00
Dec-01	19	1	19.00	
Jan-02	3	1	3.00	
Feb-02	3	1	3.00	
Mar-02	2	1	2.00	
Apr-02	15	2	7.50	0.71
May-02	113	5	22.60	22.35
Jun-02	16	1	16.00	



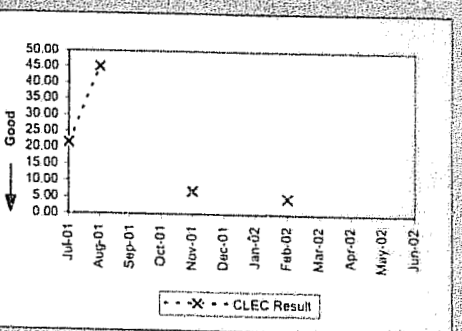
Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	6	1	6.00	
Aug-01	265	11	24.09	11.18
Sep-01	109	9	12.11	4.76
Oct-01	51	1	51.00	
Nov-01	75	5	15.00	14.78
Dec-01	176	8	22.00	43.43
Jan-02	45	4	11.25	13.84
Feb-02	9	2	4.50	0.71
Mar-02				
Apr-02	4	1	4.00	
May-02	55	3	18.33	6.43
Jun-02	2	1	2.00	



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Diagnostic)-- Interval Zone Two

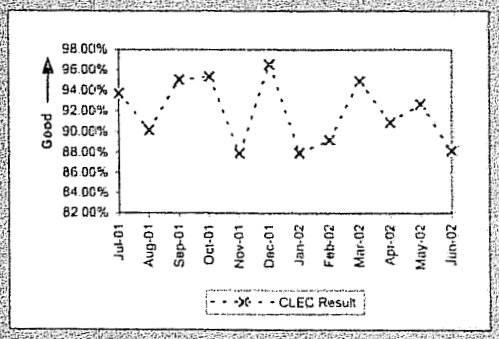
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	65	3	21.67	15.37
Aug-01	45	1	45.00	
Sep-01				
Oct-01				
Nov-01	7	1	7.00	
Dec-01				
Jan-02				
Feb-02	5	1	5.00	
Mar-02				
Apr-02				
May-02				
Jun-02				



Checklist #2 - Enhanced Extended Loops (EELs) Installation

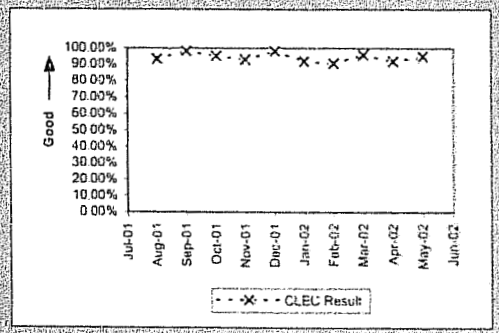
New Service Installation Quality (Percent) (OP-5) (Diagnostic)– Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	30	32	93.75%	24.21%
Aug-01	55	61	90.16%	29.78%
Sep-01	58	61	95.08%	21.62%
Oct-01	41	43	95.35%	21.06%
Nov-01	51	58	87.93%	32.58%
Dec-01	56	58	96.55%	18.25%
Jan-02	44	50	88.00%	32.50%
Feb-02	58	65	89.23%	31.00%
Mar-02	94	99	94.95%	21.90%
Apr-02	160	176	90.91%	28.75%
May-02	203	219	92.69%	26.02%
Jun-02	194	220	88.18%	32.28%



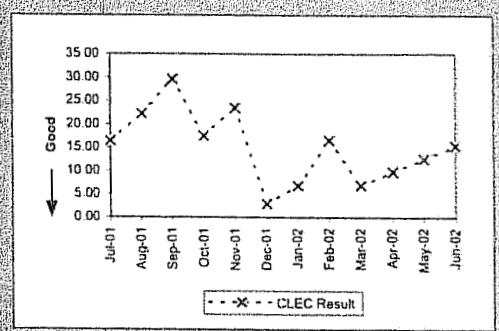
New Service Installation Quality (Percent) (OP-5) (Diagnostic)– Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01	57	61	93.44%	24.75%
Sep-01	60	61	98.36%	12.70%
Oct-01	41	43	95.35%	21.06%
Nov-01	54	58	93.10%	25.34%
Dec-01	57	58	98.28%	13.02%
Jan-02	46	50	92.00%	27.13%
Feb-02	59	65	90.77%	28.95%
Mar-02	95	99	95.96%	19.69%
Apr-02	162	176	92.05%	27.06%
May-02	208	219	94.98%	21.84%
Jun-02				



Jeopardy Notices Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

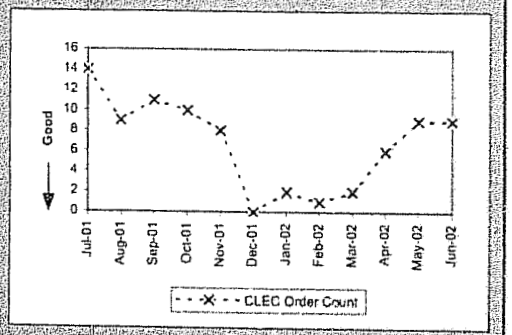
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	263	16	16.44	16.15
Aug-01	289	13	22.23	17.73
Sep-01	415	14	29.64	25.35
Oct-01	210	12	17.50	27.61
Nov-01	188	8	23.50	42.48
Dec-01	3	1	3.00	
Jan-02	48	7	6.86	8.61
Feb-02	133	8	16.62	6.63
Mar-02	90	13	6.92	11.20
Apr-02	207	21	9.86	8.49
May-02	278	22	12.64	12.97
Jun-02	449	29	15.48	16.09



Checklist #2 - Enhanced Extended Loops (EELs) Installation

Count of Pending Orders Delayed for Facilities Reasons Enhanced Extended Loops (EELs) (OP-15B) (Diagnostic)

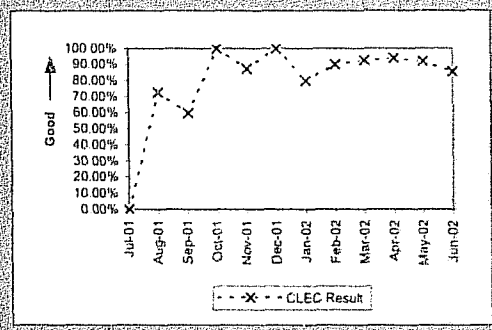
Date	CLEC Order Count
Jul-01	14
Aug-01	9
Sep-01	11
Oct-01	10
Nov-01	8
Dec-01	0
Jan-02	2
Feb-02	1
Mar-02	2
Apr-02	6
May-02	9
Jun-02	9



Checklist #2 - Enhanced Extended Loops (EELs) Repair

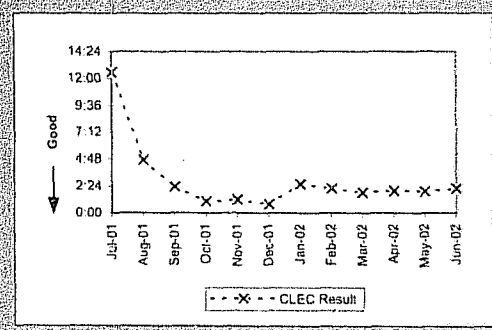
[illegible] Repeat Report Rate (Percent) (MR-5A) (Diagnostic)-- Interval Zone One

[illegible]	CLEC Num	CLEC Denom	CLEC Result	Std Dev
[illegible]	0	2	0.00%	0.00%
[illegible]	8	11	72.73%	44.54%
[illegible]	3	5	60.00%	48.99%
[illegible]	8	8	100.00%	0.00%
[illegible]	7	8	87.50%	33.07%
[illegible]	7	7	100.00%	0.00%
[illegible]	12	15	80.00%	40.00%
[illegible]	18	20	90.00%	30.00%
[illegible]	25	27	92.59%	26.19%
[illegible]	31	33	93.94%	23.86%
[illegible]	35	38	92.11%	26.97%
[illegible]	60	70	85.71%	34.99%



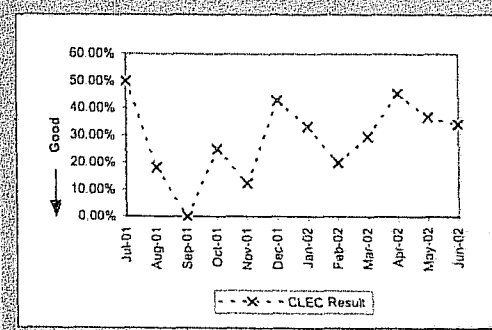
[illegible] Time to Restore (Hours:Minutes) (MR-6D) (Diagnostic)-- Interval Zone One

[illegible]	CLEC Num	CLEC Denom	CLEC Result	Std Dev
[illegible]	25:05	2	12:33	9:09
[illegible]	52:13	11	4:45	10:55
[illegible]	11:56	5	2:23	2:14
[illegible]	8:39	8	1:05	1:21
[illegible]	9:40	8	1:13	1:58
[illegible]	0:45	7	0:49	1:23
[illegible]	35:53	15	2:36	2:10
[illegible]	44:21	20	2:13	2:44
[illegible]	50:16	27	1:52	1:51
[illegible]	65:19	33	1:59	1:21
[illegible]	74:34	38	1:58	1:54
[illegible]	155:42	70	2:13	2:26



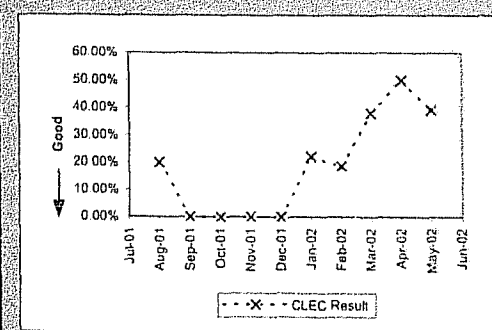
[illegible] Repeat Report Rate (Percent) (MR-7D) (Diagnostic)-- Interval Zone One

[illegible]	CLEC Num	CLEC Denom	CLEC Result	Std Dev
[illegible]	1	2	50.00%	50.00%
[illegible]	2	11	18.18%	38.57%
[illegible]	0	5	0.00%	0.00%
[illegible]	2	8	25.00%	43.30%
[illegible]	1	8	12.50%	33.07%
[illegible]	3	7	42.86%	49.49%
[illegible]	5	15	33.33%	47.14%
[illegible]	4	20	20.00%	40.00%
[illegible]	8	27	29.63%	45.66%
[illegible]	15	33	45.45%	49.79%
[illegible]	14	38	36.84%	48.24%
[illegible]	24	70	34.29%	47.47%



[illegible] Repeat Report Rate (Percent) (MR-7D*) (Diagnostic)-- Interval Zone One

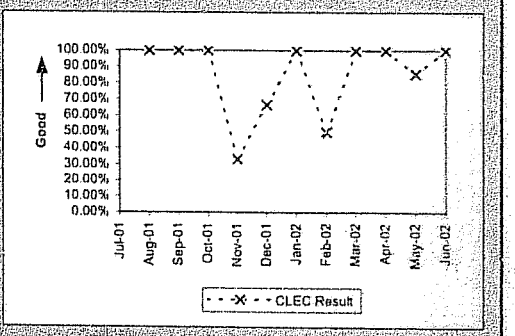
[illegible]	CLEC Num	CLEC Denom	CLEC Result	Std Dev
[illegible]	1	5	20.00%	40.00%
[illegible]	0	3	0.00%	0.00%
[illegible]	0	3	0.00%	0.00%
[illegible]	0	2	0.00%	0.00%
[illegible]	0	3	0.00%	0.00%
[illegible]	2	9	22.22%	41.57%
[illegible]	3	16	18.75%	39.03%
[illegible]	8	21	38.10%	48.56%
[illegible]	13	26	50.00%	50.00%
[illegible]	11	28	39.29%	48.84%



Checklist #2 - Enhanced Extended Loops (EELs) Repair

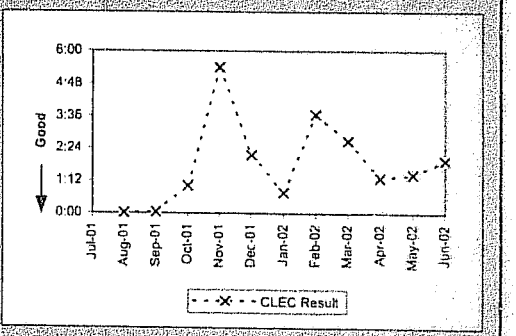
Out of Service Cleared within 4 Hours (Percent) (MR-5B) (Diagnostic)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	1	1	100.00%	0.00%
Aug-01	1	1	100.00%	0.00%
Sep-01	2	2	100.00%	0.00%
Oct-01	1	3	33.33%	47.14%
Nov-01	2	3	66.67%	47.14%
Dec-01	1	1	100.00%	0.00%
Jan-02	1	2	50.00%	50.00%
Feb-02	1	1	100.00%	0.00%
Mar-02	4	4	100.00%	0.00%
Apr-02	6	7	85.71%	34.99%
May-02	7	7	100.00%	0.00%
Jun-02				



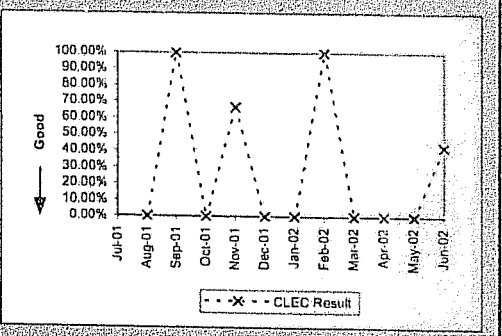
Mean Time to Restore (Hours:Minutes) (MR-6E) (Diagnostic)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01	0:01	1	0:01	
Sep-01	0:03	1	0:03	
Oct-01	2:04	2	1:02	1:21
Nov-01	10:14	3	5:25	5:10
Dec-01	6:20	3	2:10	1:58
Jan-02	0:47	1	0:47	
Feb-02	7:23	2	3:41	2:29
Mar-02	2:42	1	2:42	
Apr-02	5:15	4	1:19	0:50
May-02	10:10	7	1:27	1:49
Jun-02	13:47	7	1:58	1:48



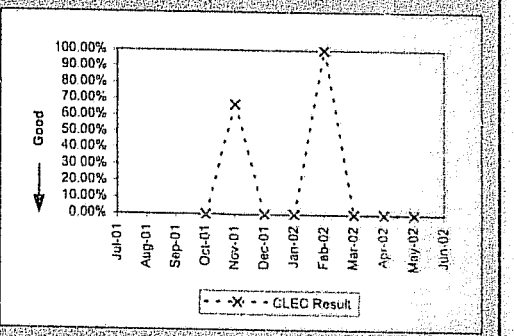
Repair Repeat Report Rate (Percent) (MR-7E) (Diagnostic)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01	0	1	0.00%	0.00%
Sep-01	1	1	100.00%	0.00%
Oct-01	0	2	0.00%	0.00%
Nov-01	2	3	66.67%	47.14%
Dec-01	0	3	0.00%	0.00%
Jan-02	0	1	0.00%	0.00%
Feb-02	2	2	100.00%	0.00%
Mar-02	0	1	0.00%	0.00%
Apr-02	0	4	0.00%	0.00%
May-02	0	7	0.00%	0.00%
Jun-02	3	7	42.86%	49.49%



Repair Repeat Report Rate (Percent) (MR-7E*) (Diagnostic)-- Interval Zone Two

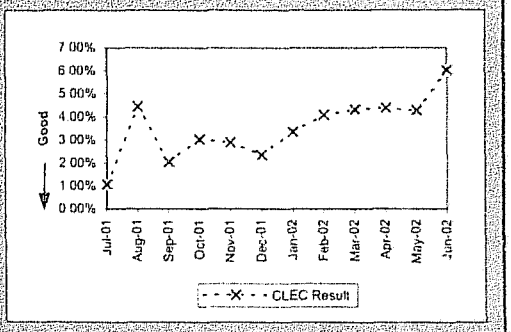
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01	0	2	0.00%	0.00%
Nov-01	2	3	66.67%	47.14%
Dec-01	0	1	0.00%	0.00%
Jan-02	0	1	0.00%	0.00%
Feb-02	2	2	100.00%	0.00%
Mar-02	0	1	0.00%	0.00%
Apr-02	0	2	0.00%	0.00%
May-02	0	5	0.00%	0.00%
Jun-02				



Checklist #2 - Enhanced Extended Loops (EELs) Repair

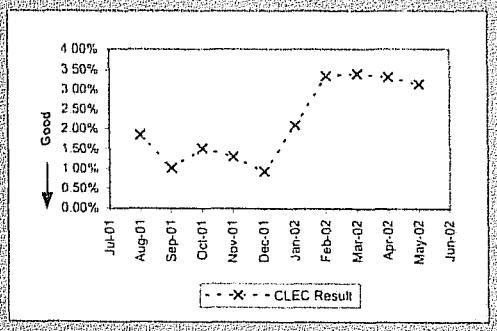
Trouble Rate (Percent) (MR-8) (Diagnostic)-- Interval Zone One and Two

	CLEC Num	CLEC Denom	CLEC Result	Std Dev
	2	185	1.08%	10.34%
	12	269	4.46%	20.64%
	6	291	2.06%	14.21%
	10	329	3.04%	17.17%
	11	379	2.90%	16.79%
	10	425	2.35%	15.16%
	16	476	3.36%	18.02%
	22	537	4.10%	19.82%
	28	646	4.33%	20.36%
	37	842	4.39%	20.50%
	45	1047	4.30%	20.28%
	77	1276	6.03%	23.81%



Trouble Rate (Percent) (MR-8*) (Diagnostic)-- Interval Zone One and Two

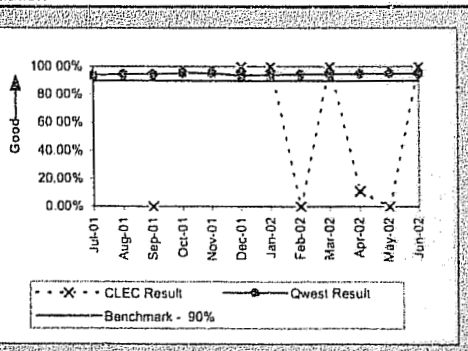
	CLEC Num	CLEC Denom	CLEC Result	Std Dev
	5	269	1.86%	13.51%
	3	291	1.03%	10.10%
	5	329	1.52%	12.23%
	5	379	1.32%	11.41%
	4	425	0.94%	9.66%
	10	476	2.10%	14.34%
	18	537	3.35%	18.00%
	22	646	3.41%	18.14%
	28	842	3.33%	17.93%
	33	1047	3.15%	17.47%



Checklist #4 - Unbundled Loop - Analog Installation

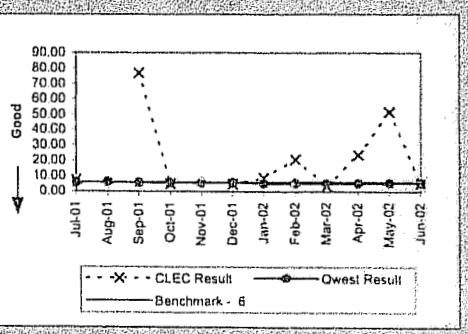
Percent Installations Met (Percent) (OP-3A) (Benchmark)-- Dispatches Within MSAs

			CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
				101453	107913	94.01%		
				116985	123510	94.72%		
	9	1	0.00%	95980	101360	94.69%	1.94	0.18
				102807	107641	95.51%		
				90576	94835	95.51%		
	1	1	100.00%	77649	83187	93.58%	-0.26	-1.16
	1	1	100.00%	87677	93062	94.21%	-0.25	-1.15
	2	2	0.00%	75993	80380	94.54%	2.97	0.81
	2	2	100.00%	79869	84176	94.88%	-0.33	-1.2
	1	9	11.11%	77365	81478	94.95%	6.28	2.82
	5	1	0.00%	79069	83092	95.16%	1.98	0.2
	4	4	100.00%	73394	77187	95.09%	-0.51	-1.31



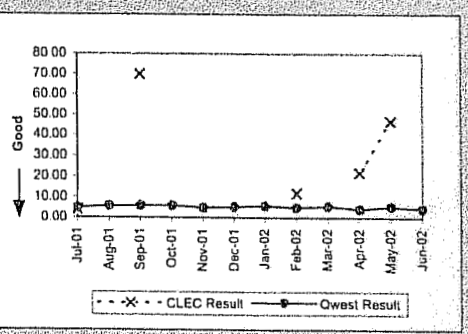
Percent Installations Met Average Days (OP-4A) (Benchmark)-- Dispatches Within MSAs

			CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
	20	3	7.67	627093	108632	5.77	3.09	0.88
				756073	124681	6.06		
	49	1	72.00	590685	102246	5.78	3.72	1.26
	1	1	5.00	504065	108450	5.48	-0.07	-1.04
				535815	95545	5.61		
	5	1	5.00	493094	83716	5.77	-0.11	-1.07
	9	1	9.00	491146	93683	5.24	1.02	-0.38
	53	1	24.00	432139	80849	5.35	2.51	0.53
	2	2	3.50	444524	84611	5.25	-0.43	-1.26
	19	6	23.89	440980	81998	5.38	3.72	1.26
	43	1	52.00	465033	83625	5.56	2.75	0.67
	33	6	5.17	435336	77866	5.59	-0.16	-1.1



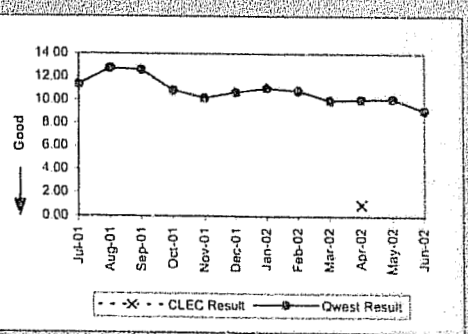
Percent Installations Met Due to Facility Reasons (Average Days) (OP-6A-1) (Parity)-- Dispatches Within MSAs

			CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
	1	1	4.00	14174	2930	4.84	-0.05	-1.03
				16695	2936	5.69		
	52	1	72.00	14066	2393	5.88	3.72	1.26
				15313	2584	5.93		
				13284	2749	4.83		
				13731	2596	5.29		
				17623	3019	5.84		
	24	2	12.00	11586	2339	4.95	1.55	-0.06
				12141	2146	5.66		
	155	7	22.14	8596	1992	4.32	2.88	0.75
	33	1	47.00	10503	1893	5.55	2.2	0.34
				8402	1923	4.37		



Percent Installations Met Due to Facility Reasons (Average Days) (OP-6B-1) (Parity)-- Dispatches Within MSAs

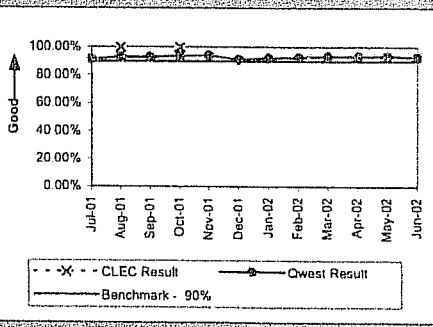
			CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
				45480	4001	11.37		
				51808	4065	12.74		
				43173	3424	12.61		
				31553	2910	10.84		
				22697	2225	10.20		
				30644	2870	10.68		
				27747	2510	11.05		
				22975	2128	10.80		
				22382	2244	9.97		
	1	1	1.00	22256	2214	10.05	-0.64	-1.39
				22642	2234	10.14		
				18016	1976	9.12		



Checklist #4 - Unbundled Loop - Analog Installation

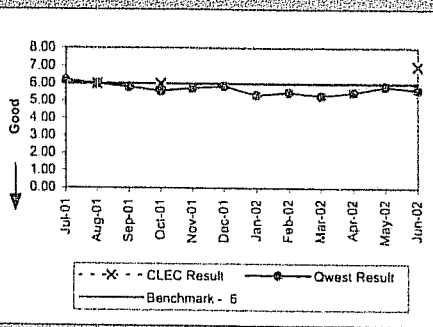
Average Completed Interval (Parity) (OP-3B) (Benchmark)-- Dispatches Outside MSAs

		CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
			24477	26602	91.33%		
	1	101.00%	28879	31044	93.03%	-0.27	-1.17
			23779	25642	92.73%		
	1	100.00%	27120	28950	93.68%	-0.26	-1.16
			24003	25483	94.19%		
			19992	21913	91.23%		
			21795	23655	92.14%		
			19054	20562	92.67%		
			20928	22417	93.36%		
			20508	22052	93.45%		
			22390	23942	93.52%		
			20406	21971	92.87%		



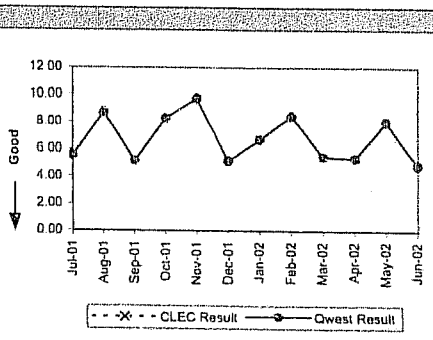
Average Completed Interval (Average Days) (OP-4B) (Benchmark)-- Dispatches Outside MSAs

		CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
			182845	27015	6.21		
	1	6.00	186068	31345	6.00	0	-1
			150120	25882	5.80		
	1	6.00	162443	29151	5.57	2.37	0.44
			147419	25641	5.75		
			129088	22050	5.85		
			127251	23811	5.34		
			113639	20683	5.50		
			119303	22535	5.29		
			122106	22196	5.50		
			140663	24086	5.84		
	1	7.00	125502	22151	5.66	0.77	-0.53



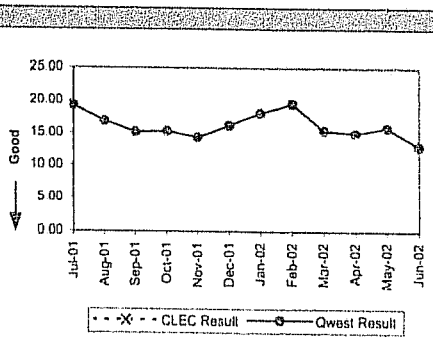
Average Duration of Service (Average Days) (OP-6A-2) (Parity)-- Dispatches Outside MSAs

		CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
			4517	812	5.56		
			6640	761	8.73		
			3183	615	5.18		
			6022	726	8.29		
			6120	629	9.73		
			3952	767	5.15		
			5886	876	6.72		
			5648	692	8.45		
			3373	619	5.45		
			3085	579	5.33		
			5039	627	8.04		
			2783	574	4.85		



Average Duration of Service Reasons (Average Days) (OP-6B-2) (Parity)-- Dispatches Outside MSAs

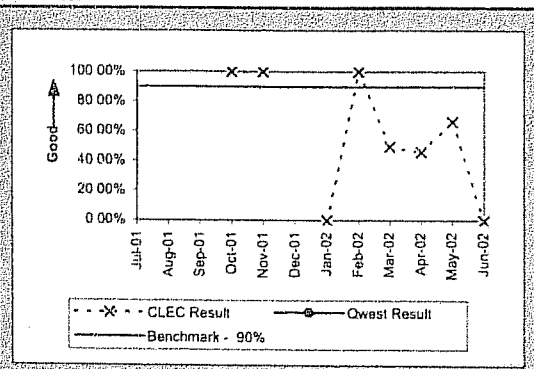
		CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
			31477	1638	19.22		
			25640	1521	16.86		
			20871	1375	15.18		
			19326	1262	15.31		
			14469	1009	14.37		
			19090	1179	16.20		
			18628	1027	18.14		
			16560	846	19.57		
			13637	885	15.41		
			13418	892	15.04		
			15005	946	15.86		
			13094	1007	13.00		



Checklist #4 - Unbundled Loop - Analog Installation

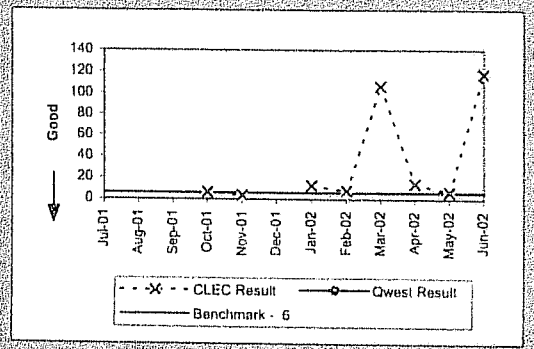
Percent Measures Met (Parity) (OP-3C) (Benchmark)-- No Dispatches

		CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
		100.00%					
		100.00%					
		0.00%					
		100.00%					
		50.00%					
		66.18%					
		66.67%					
		0.00%					



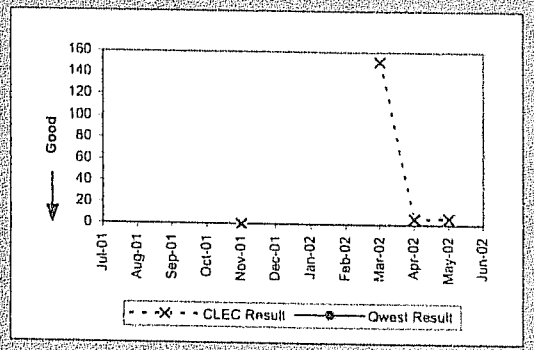
Average Days (OP-4C) (Benchmark)-- No Dispatches

		CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
		6.55					
		4.00					
		13.00					
		8.00					
		106.67					
		14.33					
		7.00					
		118.00					



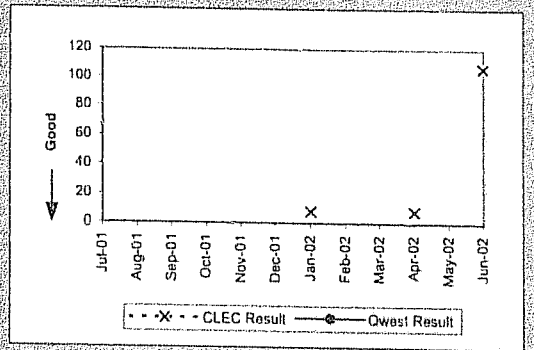
Average Days (OP-6A-3) (Parity)-- No Dispatches

		CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
		6.00					
		151.00					
		5.71					
		6.00					



Average Days (OP-6B-3) (Parity)-- No Dispatches

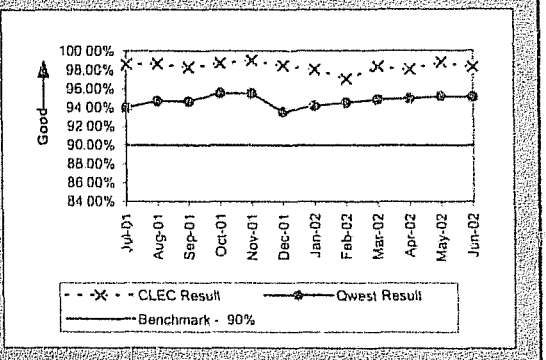
		CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
		6.00					
		8.50					
		107.00					



Checklist #4 - Unbundled Loop - Analog Installation

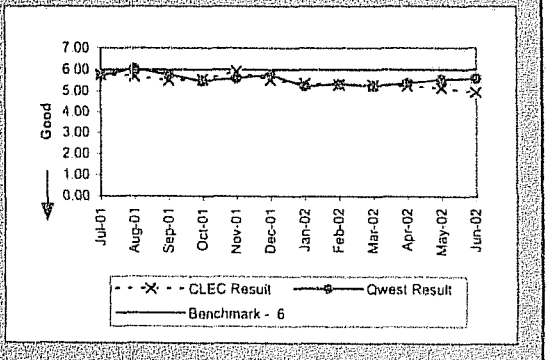
Percent Missed Appointments Met (Percent) (OP-3D) (Benchmark)-- Interval Zone One

			CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
			98.64%	98326	104576	94.02%	-19.85	-13.07
			98.69%	113047	119343	94.72%	-19.89	-13.09
			98.29%	92711	97990	94.70%	-18.03	-11.96
			98.76%	99359	104008	95.53%	-20.4	-13.4
			96.53%	87547	91670	95.50%	-20.73	-13.61
			94.49%	75318	80519	93.54%	-24.97	-16.18
			98.10%	84792	90014	94.20%	-19.85	-13.07
			97.08%	73579	77829	94.54%	-12.07	-8.34
			96.35%	77346	81530	94.87%	-16.16	-10.82
			98.06%	74920	78889	94.97%	-15.52	-10.43
			98.80%	76335	80193	95.19%	-19.65	-12.95
			98.31%	70918	74543	95.14%	-17.58	-11.69



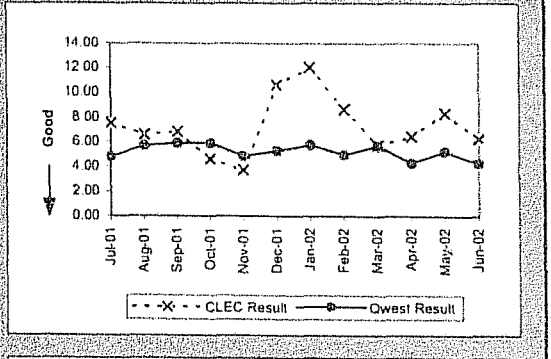
Average Interval (Average Days) (OP-4D) (Benchmark)-- Interval Zone One

			CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
			5.79	604842	105243	5.75	0.36	-0.78
			5.72	729131	120405	6.06	-3.02	-2.84
			5.53	570254	98729	5.78	-2.39	-2.45
			5.56	573872	104763	5.48	1.14	-0.31
			5.94	519328	92355	5.62	3.89	1.36
			5.54	469419	81031	5.79	-3.46	-3.1
			5.39	477068	90618	5.26	1.52	-0.07
			5.33	418367	78278	5.34	-0.2	-1.12
			5.29	430966	81951	5.26	0.46	-0.72
			5.27	427470	79390	5.38	-1.64	-2
			5.17	448206	80700	5.55	-5	-4.04
			4.97	420753	75184	5.60	-9.14	-6.56



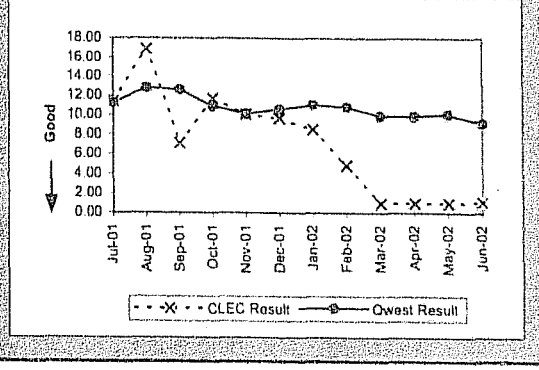
Percent Jeopardy Notices for Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

			CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
			7.54	13500	2847	4.78	3.14	0.91
			6.81	16094	2819	5.71	0.73	-0.56
			6.66	13542	2286	5.92	1.09	-0.34
			4.65	14719	2493	5.90	-1.72	-2.05
			3.75	13692	2861	4.89	-1.74	-2.06
			10.62	13486	2540	5.31	9.18	4.58
			12.94	16910	2919	5.80	4.7	1.86
			8.68	11216	2253	4.98	5.61	2.41
			5.79	11838	2071	5.72	0.06	-0.96
			6.49	8262	1913	4.32	3.75	1.28
			8.36	9602	1824	5.26	2.22	0.35
			6.31	7920	1838	4.31	3.24	0.97



Percent Jeopardy Notices for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

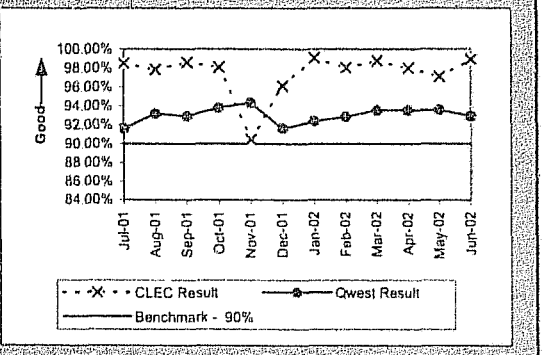
			CLEC Result	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
			11.38	43591	3857	11.30	0.03	-0.98
			10.58	50367	3936	12.80	2.07	0.26
			7.14	41851	3318	12.61	-1.29	-1.78
			11.71	30441	2799	10.88	1.83	0.11
			10.07	21783	2152	10.12	-0.02	-1.01
			9.58	29582	2788	10.61	-0.68	-1.41
			8.56	27092	2443	11.09	-1.59	-1.96
			4.88	22404	2073	10.81	-1.4	-1.85
			1.00	21819	2194	9.94	-0.62	-1.37
			1.00	21283	2151	9.89	-1.68	-2.02
			1.00	21570	2135	10.10	-1.2	-1.73
			1.11	17359	1880	9.19	-1.17	-1.71



Checklist #4 - Unbundled Loop - Analog Installation

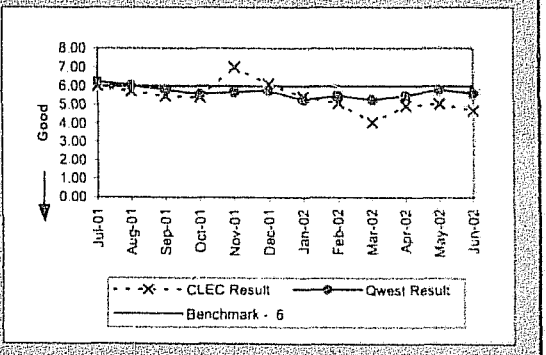
Missed Commitments Met (Percent) (OP-3E) (Benchmark)-- Interval Zone Two

			CLEC Result	Qwest Num	Qwest Denor	Qwest Result	Mod Z Scr	Parity Score
			98.52%	27604	30139	91.59%	-13.53	-9.22
			97.88%	32820	35211	93.21%	-8.9	-6.41
			98.65%	27048	29102	92.94%	-10.41	-7.33
			98.13%	30568	32583	93.82%	-12.34	-8.5
			96.50%	27032	28648	94.36%	10.31	5.27
			96.14%	22523	24581	91.63%	-8.98	-6.46
			99.12%	24680	26703	92.42%	-16.1	-10.76
			98.65%	21468	23113	92.88%	-11.13	-7.77
			98.83%	23451	25063	93.57%	-14.81	-10
			98.03%	23053	24641	93.56%	-12.64	-8.69
			97.14%	25124	26841	93.60%	-9.82	-6.97
			98.93%	22880	24615	92.95%	-13.33	-9.1



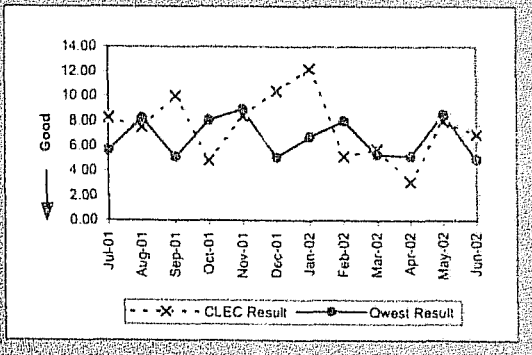
Installation Interval (Average Days) (OP-4E) (Benchmark)-- Interval Zone Two

			CLEC Result	Qwest Num	Qwest Denor	Qwest Result	Mod Z Scr	Parity Score
			6.62	190096	30404	6.25	-0.59	-1.36
			5.74	215030	35621	6.04	-0.93	-1.56
			5.48	170551	29399	5.80	-1.12	-1.68
			5.42	182036	32816	5.57	-0.56	-1.34
			7.03	163906	28831	5.69	4.96	2.01
			6.14	142763	24735	5.77	1.13	-0.31
			5.44	141329	26876	5.26	0.74	-0.55
			5.10	127611	23254	5.49	-0.97	-1.59
			4.66	132661	25195	5.27	-6.18	-4.78
			4.65	135616	24804	5.47	-3.19	-2.94
			5.07	157490	27011	5.83	-2.78	-2.69
			4.70	139865	24833	5.63	-6.28	-4.82



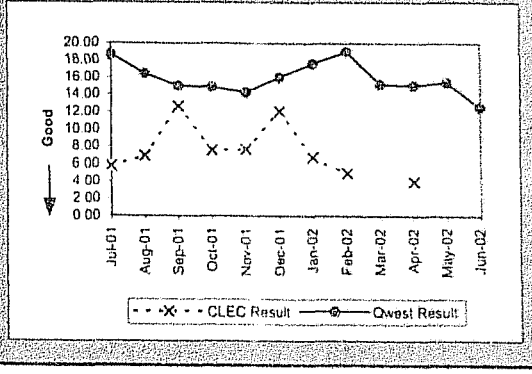
Missed Repair Commitments for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

			CLEC Result	Qwest Num	Qwest Denor	Qwest Result	Mod Z Scr	Parity Score
			8.27	5091	895	5.69	1.2	-0.27
			7.53	7241	878	8.25	-0.18	-1.11
			9.98	3707	722	5.13	1.48	-0.1
			4.86	6616	817	8.10	-0.97	-1.59
			8.39	6402	717	8.93	-0.19	-1.12
			10.39	4197	823	5.10	4.39	1.67
			12.16	6590	976	6.75	1.51	-0.08
			5.16	6218	778	7.99	-0.67	-1.41
			5.75	3676	694	5.30	0.78	-0.54
			3.12	3419	658	5.20	-1.34	-1.81
			7.99	5940	696	8.53	-0.13	-1.08
			6.95	3265	659	4.95	1.03	-0.38



Missed Repair Commitments for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

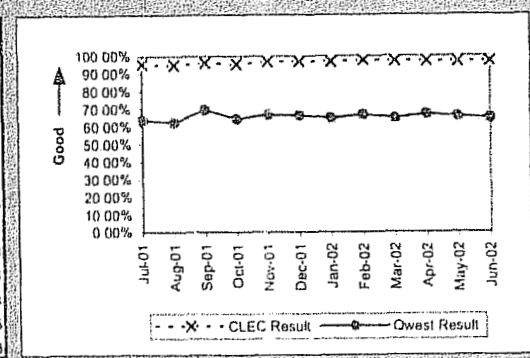
			CLEC Result	Qwest Num	Qwest Denor	Qwest Result	Mod Z Scr	Parity Score
			5.61	33366	1782	18.72	-1.52	-1.92
			6.94	27081	1650	16.41	-1.93	-2.17
			12.67	22193	1481	14.99	-0.34	-1.21
			7.58	20436	1374	14.87	-1.32	-1.8
			7.69	15413	1082	14.24	-2.08	-2.26
			12.08	20158	1261	15.99	-0.45	-1.27
			6.78	19283	1094	17.63	-0.66	-1.4
			5.60	17131	901	19.01	-0.23	-1.14
				14200	935	15.19		
			4.00	14393	955	15.07	-0.65	-1.39
				16077	1045	15.38		
				13751	1094	12.57		



Checklist #4 - Unbundled Loop - Analog Installation

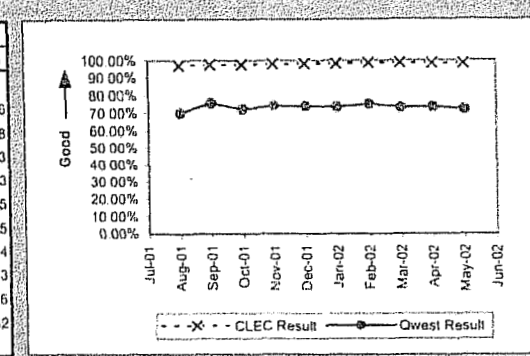
[illegible] (OP-5) (Parity) - Interval Zone One and Two

[illegible]	[illegible]	[illegible]	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
[illegible]	[illegible]	[illegible]	88119	138351	63 69%	-79 19	-49 15
[illegible]	[illegible]	[illegible]	91135	145845	62 49%	-81 09	-50 3
[illegible]	[illegible]	[illegible]	90993	142091	64 07%	-71 87	-44 69
[illegible]	[illegible]	[illegible]	85673	132876	64 48%	-89 09	-55 16
[illegible]	[illegible]	[illegible]	92449	129399	66 81%	-92	-56 93
[illegible]	[illegible]	[illegible]	75321	113493	66 37%	-89 86	-55 63
[illegible]	[illegible]	[illegible]	72488	111652	64 92%	-92 08	-56 98
[illegible]	[illegible]	[illegible]	73213	109527	66 84%	-84 51	-52 38
[illegible]	[illegible]	[illegible]	67799	104346	64 98%	-83 46	-51 74
[illegible]	[illegible]	[illegible]	70953	105672	67 14%	-81 91	-50 8
[illegible]	[illegible]	[illegible]	69600	105955	65 75%	-87 43	-54 15
[illegible]	[illegible]	[illegible]	67250	103869	64 75%	-90 68	-56 13



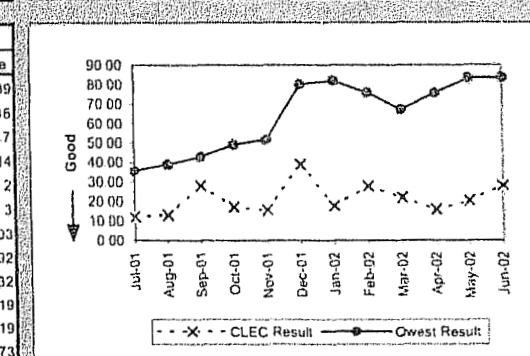
[illegible] (OP-5) (Parity) - Interval Zone One and Two

[illegible]	[illegible]	[illegible]	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
[illegible]	[illegible]	[illegible]	102470	145845	70 27%	-70 83	-44 06
[illegible]	[illegible]	[illegible]	107793	142091	75 86%	-63 3	-39 48
[illegible]	[illegible]	[illegible]	96213	132876	72 41%	-77 35	-48 03
[illegible]	[illegible]	[illegible]	96038	129399	74 22%	-78 34	-48 63
[illegible]	[illegible]	[illegible]	84896	113493	74 10%	-75 75	-47 05
[illegible]	[illegible]	[illegible]	82004	111652	73 45%	-76 9	-47 75
[illegible]	[illegible]	[illegible]	82360	109527	75 20%	-69 97	-43 54
[illegible]	[illegible]	[illegible]	76390	104346	73 21%	-70 29	-43 73
[illegible]	[illegible]	[illegible]	77818	105672	73 64%	-71 71	-44 6
[illegible]	[illegible]	[illegible]	76445	105955	72 15%	-77 01	-47 82



[illegible] Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

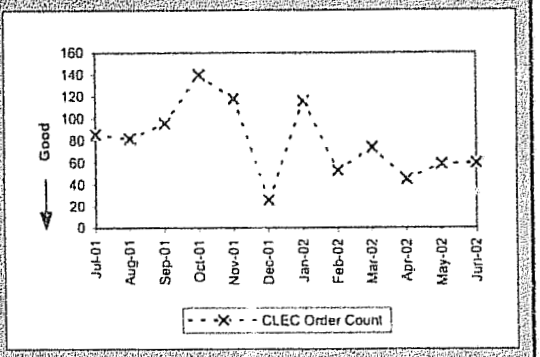
[illegible]	[illegible]	[illegible]	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
[illegible]	[illegible]	[illegible]	260107	7274	35 76	-7 22	-5.39
[illegible]	[illegible]	[illegible]	353327	9054	39 02	-8 98	-6 46
[illegible]	[illegible]	[illegible]	372410	8683	42 89	-4 44	-3.7
[illegible]	[illegible]	[illegible]	395543	8034	49 23	-8 45	-6.14
[illegible]	[illegible]	[illegible]	461923	8916	51 81	-10 19	-7 2
[illegible]	[illegible]	[illegible]	403510	5030	80 26	-6 43	-4 3
[illegible]	[illegible]	[illegible]	403644	4925	81 96	-11 57	-8 03
[illegible]	[illegible]	[illegible]	398154	5247	75 88	-6 45	-4 92
[illegible]	[illegible]	[illegible]	434618	6449	67 39	-7 11	-5.32
[illegible]	[illegible]	[illegible]	454743	6002	75 77	-10 18	-7 19
[illegible]	[illegible]	[illegible]	472442	5675	83 25	-8 53	-6.19
[illegible]	[illegible]	[illegible]	502334	6010	83 58	-6 14	-4 73



Checklist #4 - Unbundled Loop - Analog Installation

Percent Missing Dispatch Delayed for Facilities Reasons Unbundled Loop Analog (OP-15B) (Diagnostic)

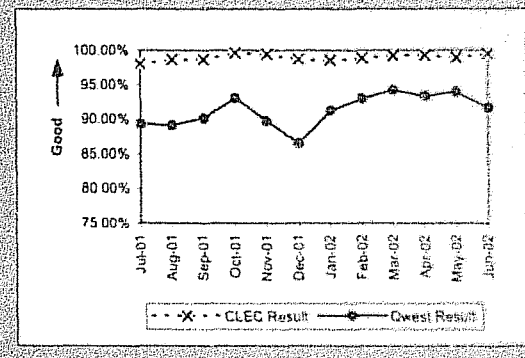
Date	CLEC Order Count
Jul-01	86
Aug-01	82
Sep-01	96
Oct-01	140
Nov-01	118
Dec-01	26
Jan-02	116
Feb-02	53
Mar-02	74
Apr-02	45
May-02	59
Jun-02	60



Checklist #4 - Unbundled Loop - Analog Repair

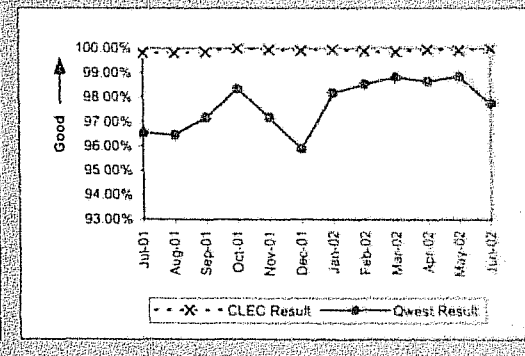
Out of Service Cleared within 24 hours (Percent) (MR-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	2105	2142	98.09%	13.70%	135739	151870	89.38%	-12.99	-8.9
Aug-01	2574	2608	98.70%	11.34%	135635	152181	89.13%	-15.57	-10.46
Sep-01	1929	1953	98.77%	11.02%	104886	116310	90.18%	-12.65	-8.69
Oct-01	2575	2584	99.65%	5.89%	109046	117149	93.08%	-13.02	-8.91
Nov-01	2208	2219	99.50%	7.02%	95817	106724	89.78%	-14.97	-10.1
Dec-01	2136	2163	98.75%	11.10%	86839	100302	86.58%	-16.43	-10.99
Jan-02	2140	2170	98.62%	11.68%	84235	92298	91.26%	-11.99	-8.29
Feb-02	1690	1709	98.89%	10.49%	75513	81208	92.99%	-9.45	-6.75
Mar-02	1866	1880	99.26%	8.60%	82531	87583	94.23%	-9.24	-6.62
Apr-02	2002	2015	99.35%	8.01%	82006	87804	93.40%	-10.65	-7.47
May-02	2101	2123	98.96%	10.13%	86852	92432	93.96%	-9.56	-6.82
Jun-02	2117	2126	99.58%	6.49%	90088	98272	91.67%	-13.05	-8.93



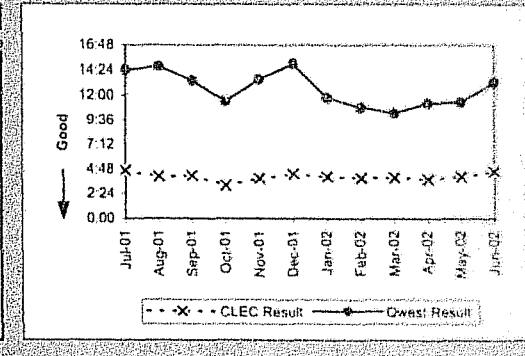
All Troubles Cleared within 48 hours (Percent) (MR-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	2167	2171	99.82%	4.29%	208663	216124	96.55%	-8.3	-6.05
Aug-01	2622	2627	99.81%	4.36%	213852	221671	96.47%	-9.22	-6.6
Sep-01	1970	1982	99.85%	3.89%	165739	170549	97.18%	-7.14	-5.34
Oct-01	2611	2611	100.00%	0.00%	171388	174256	98.35%	-6.56	-4.99
Nov-01	2256	2257	99.96%	2.10%	156584	161124	97.18%	-7.91	-5.81
Dec-01	2189	2191	99.91%	3.02%	145016	151205	95.91%	-9.39	-6.71
Jan-02	2240	2241	99.96%	2.11%	141626	144265	98.17%	-6.26	-4.8
Feb-02	1760	1762	99.89%	3.37%	124133	125977	98.54%	-4.69	-3.85
Mar-02	1933	1936	99.85%	3.93%	132020	133587	98.83%	-4.13	-3.51
Apr-02	2071	2072	99.95%	2.20%	132693	134513	98.65%	-5.1	-4.1
May-02	2219	2221	99.91%	3.00%	137227	138833	98.84%	-4.66	-3.84
Jun-02	2375	2375	100.00%	0.00%	139297	142492	97.76%	-7.32	-5.45



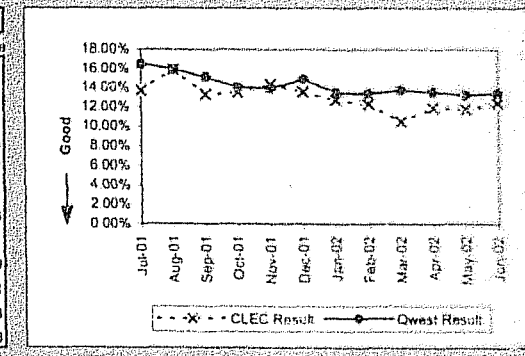
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	10218:32	2171	4:42	7:16	3112419:03	216124	14:24	-19.63	-12.93
Aug-01	10809:17	2627	4:07	7:02	3278120:05	221671	14:47	-25.67	-16.61
Sep-01	8323:43	1982	4:12	8:27	2287071:26	170549	13:25	-26.3	-16.99
Oct-01	8449:56	2611	3:14	4:56	1999011:09	174256	11:28	-29.76	-19.09
Nov-01	8870:10	2257	3:56	5:41	2180063:07	161124	13:32	-26.81	-17.3
Dec-01	9679:20	2191	4:22	6:23	2269875:29	151205	15:01	-11.35	-7.9
Jan-02	9102:55	2241	4:04	6:11	1702709:38	144265	11:48	-23.64	-15.37
Feb-02	6953:29	1762	3:57	6:08	1363909:39	125977	10:50	-21.72	-14.21
Mar-02	7796:07	1936	4:02	6:30	1378964:14	133587	10:19	-22.22	-14.51
Apr-02	7960:24	2072	3:51	5:37	1513288:52	134513	11:15	-24.7	-16.01
May-02	9110:42	2221	4:06	6:04	1579055:37	138833	11:22	-27.04	-17.44
Jun-02	10089:32	2375	4:38	5:54	1891679:45	142492	13:17	-29.59	-18.99



Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

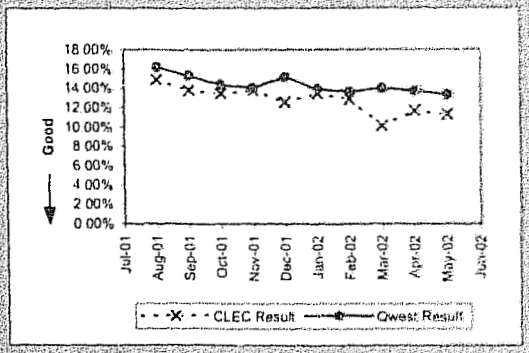
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	298	2171	13.73%	34.41%	36711	222495	16.50%	-3.46	-3.11
Aug-01	418	2627	15.91%	36.58%	36475	229071	15.92%	-0.02	-1.01
Sep-01	264	1982	13.32%	33.98%	26528	175627	15.10%	-2.21	-2.34
Oct-01	354	2611	13.56%	34.23%	25170	179250	14.04%	-0.71	-1.43
Nov-01	324	2257	14.36%	35.06%	23104	165577	13.95%	0.55	-0.67
Dec-01	296	2191	13.60%	34.28%	23201	156058	14.87%	-1.65	-2.01
Jan-02	280	2241	12.76%	33.37%	20015	148139	13.51%	-1.03	-1.63
Feb-02	217	1762	12.32%	32.86%	17277	128857	13.41%	-1.34	-1.81
Mar-02	264	1936	10.54%	30.70%	18778	136418	13.77%	-4.09	-3.49
Apr-02	247	2072	11.92%	32.40%	18684	137448	13.59%	-2.21	-2.34
May-02	262	2221	11.80%	32.26%	18817	141844	13.27%	-2.03	-2.23
Jun-02	295	2375	12.42%	32.98%	19703	145975	13.50%	-1.52	-1.93



Checklist #4 - Unbundled Loop - Analog Repair

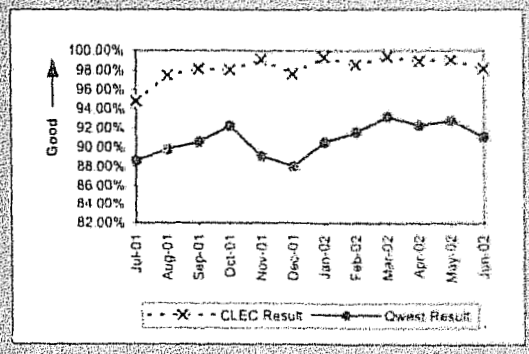
Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01									
Aug-01	238	1592	14 95%	35 66%	29847	183934	16 23%	-1 38	-1 84
Sep-01	170	1228	13 84%	34 54%	21575	140596	15 35%	-1 45	-1 88
Oct-01	203	1504	13 50%	34 17%	19973	138641	14 41%	-1	-1 61
Nov-01	196	1418	13 82%	34 51%	18200	129569	14 05%	-0 24	-1 15
Dec-01	181	1440	12 57%	33 15%	18422	121289	15 19%	-2 75	-2 67
Jan-02	189	1408	13 42%	34 09%	15479	111616	13 87%	-0 48	-1 29
Feb-02	143	1111	12 87%	33 49%	13110	96152	13 63%	-0 74	-1 45
Mar-02	123	1210	10 17%	30 22%	14571	103946	14 02%	-3 84	-3 33
Apr-02	150	1332	11 71%	32 16%	15025	109539	13 72%	-2 11	-2 29
May-02	170	1496	11 36%	31 74%	15377	115670	13 29%	-2 18	-2 33
Jun-02									



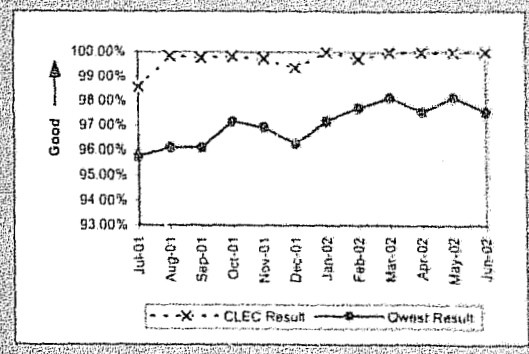
Out of Service Cleared within 24 hours (Percent) (MR-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	460	485	94 85%	22 11%	42277	47687	88 66%	-4 28	-3 6
Aug-01	547	561	97 50%	15 60%	42401	47185	89 86%	-5 96	-4 62
Sep-01	428	436	98 17%	13 42%	31903	35212	90 60%	-5 38	-4 27
Oct-01	550	561	98 04%	13 86%	31165	33787	92 24%	-5 09	-4 1
Nov-01	359	362	99 17%	9 07%	27836	31250	89 08%	-6 12	-4 72
Dec-01	301	308	97 73%	14 90%	24131	27384	88 12%	-5 18	-4 15
Jan-02	305	307	99 35%	8 05%	22689	25049	90 58%	-5 23	-4 18
Feb-02	350	355	98 59%	11 78%	20522	22414	91 56%	-4 73	-3 86
Mar-02	326	328	99 39%	7 78%	23156	24852	93 18%	-4 43	-3 7
Apr-02	482	487	98 97%	10 08%	26075	28248	92 31%	-5 47	-4 33
May-02	558	563	99 11%	9 38%	28849	31089	92 79%	-5 74	-4 49
Jun-02	660	675	98 22%	13 21%	32041	35151	91 15%	-6 41	-4 89



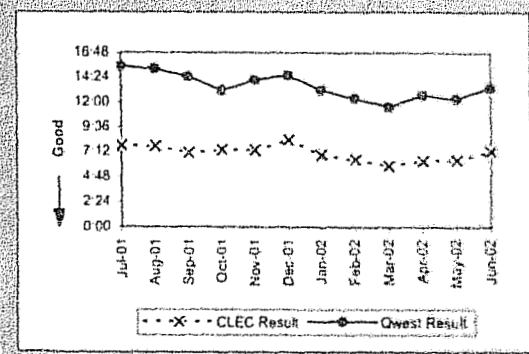
All Troubles Cleared within 48 hours (Percent) (MR-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	478	485	98 56%	11 93%	64980	67861	95 75%	-3 05	-2 85
Aug-01	560	561	99 82%	4 22%	65687	68342	96 12%	-4 52	-3 75
Sep-01	435	436	99 77%	4 78%	49628	51634	96 12%	-3 93	-3 39
Oct-01	562	563	99 82%	4 21%	49887	51344	97 16%	-3 78	-3 3
Nov-01	363	364	99 73%	5 23%	46443	47923	96 91%	-3 09	-2 88
Dec-01	306	308	99 35%	8 03%	40588	42162	96 27%	-2 84	-2 73
Jan-02	311	311	100 00%	0 00%	39292	40441	97 16%	-3	-2 83
Feb-02	360	361	99 72%	5 26%	34919	35738	97 71%	-2 55	-2 55
Mar-02	361	361	100 00%	0 00%	38412	39140	98 14%	-2 6	-2 58
Apr-02	506	506	100 00%	0 00%	42290	43356	97 54%	-3 55	-3 16
May-02	595	595	100 00%	0 00%	45442	46305	98 14%	-3 34	-3 03
Jun-02	729	729	100 00%	0 00%	48509	49731	97 54%	-4 25	-3 59



Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two

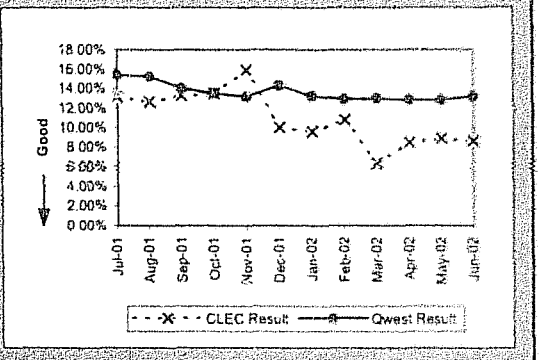
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	3795:03	485	7 49	10 15	1049570 35	67861	15 28	-8 13	-5 94
Aug-01	4547:02	561	7 44	8 46	1039536 55	68342	15 13	-9 23	-6 61
Sep-01	3102:44	436	7 07	8 10	745153 49	51634	14 26	-8 49	-6 16
Oct-01	4183:14	563	7 24	8 37	672861 55	51344	13 06	-7 64	-5 64
Nov-01	2580:30	364	7 22	8 19	677080 29	47923	14 08	-8 34	-6 07
Dec-01	2583:59	308	8 23	10 49	615271 39	42162	14 36	-4 32	-3 63
Jan-02	2150:41	311	6 55	7 50	532326 37	40441	13 10	-6 37	-4 88
Feb-02	2332:14	361	6 28	8 09	442029 49	35738	12 22	-6 9	-5 19
Mar-02	2117:28	361	5 52	6 54	452842 06	39140	11 34	-5 31	-4 23
Apr-02	3213:15	506	6 21	7 33	550419 10	43356	12 42	-8 41	-6 11
May-02	3811:20	595	6 24	7 08	567916 04	46305	12 16	-10 16	-7 18
Jun-02	5330:15	729	7 19	7 53	668014 58	49731	13 26	-10 95	-7 66



Checklist #4 - Unbundled Loop - Analog Repair

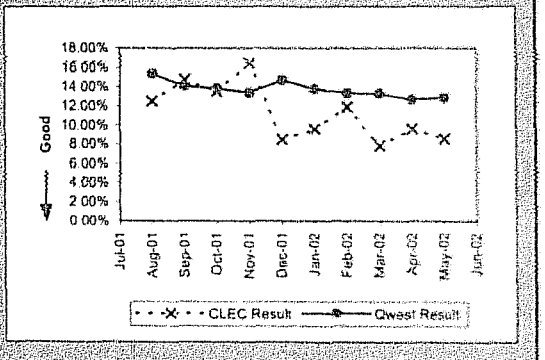
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	64	485	13.20%	33.84%	10661	69153	15.42%	-1.35	-1.82
Aug-01	71	561	12.66%	33.25%	10685	70009	15.26%	-1.71	-2.04
Sep-01	58	436	13.30%	33.96%	7386	52593	14.04%	-0.44	-1.27
Oct-01	75	563	13.50%	34.17%	7063	52245	13.52%	-0.01	-1.01
Nov-01	58	368	15.53%	36.68%	6422	48718	13.18%	1.52	-0.08
Dec-01	51	308	10.06%	30.09%	6165	43011	14.33%	-2.13	-2.3
Jan-02	30	311	9.65%	29.52%	5446	41134	13.24%	-1.86	-2.13
Feb-02	39	361	10.80%	31.04%	4706	36302	12.96%	-1.22	-1.74
Mar-02	23	361	6.37%	24.42%	5160	39722	12.99%	-3.72	-3.26
Apr-02	43	506	8.50%	27.89%	5640	43916	12.84%	-2.9	-2.77
May-02	53	595	8.91%	28.49%	6045	46961	12.87%	-2.87	-2.74
Jun-02	63	729	8.64%	28.10%	6655	50518	13.17%	-3.59	-3.18



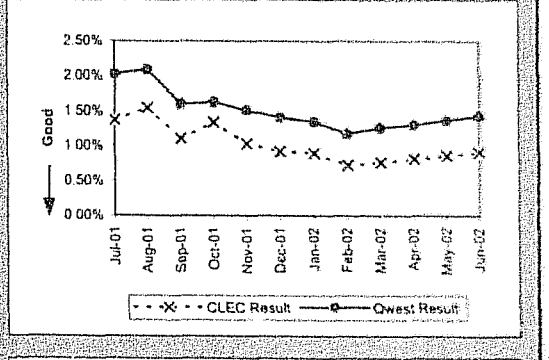
Repair Repeat Report Rate (Percent) (MR-7E*) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01									
Aug-01	52	416	12.50%	33.07%	8645	56292	15.36%	-1.61	-1.98
Sep-01	45	305	14.75%	35.46%	5909	42031	14.06%	0.36	-0.78
Oct-01	55	392	13.52%	34.19%	5691	41209	13.81%	-0.17	-1.1
Nov-01	44	267	16.48%	37.10%	5031	37528	13.41%	1.44	-0.12
Dec-01	20	235	8.51%	27.90%	4814	32763	14.69%	-2.67	-2.62
Jan-02	22	228	9.65%	29.53%	4182	30336	13.79%	-1.8	-2.1
Feb-02	30	252	11.90%	32.38%	3533	26557	13.30%	-0.65	-1.4
Mar-02	20	255	7.84%	26.88%	3941	29666	13.28%	-2.55	-2.55
Apr-02	36	373	9.65%	29.53%	4440	35055	12.67%	-1.74	-2.06
May-02	30	454	6.59%	28.02%	4915	38190	12.87%	-2.71	-2.65
Jun-02									



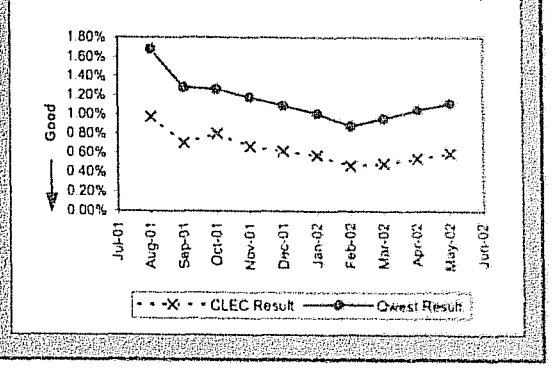
Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	2656	193778	1.37%	11.63%	291648	14395514	2.03%	-20.34	-13.37
Aug-01	3186	206176	1.55%	12.34%	299080	14314198	2.09%	-17.12	-11.41
Sep-01	2418	218124	1.11%	10.47%	228220	14285037	1.60%	-18.08	-11.99
Oct-01	3174	236898	1.34%	11.50%	231495	14244813	1.63%	-10.89	-7.62
Nov-01	2621	253032	1.04%	10.12%	214295	14182796	1.51%	-19.42	-12.81
Dec-01	2499	270468	0.92%	9.57%	199069	14128582	1.41%	-21.2	-13.89
Jan-02	2552	284032	0.90%	9.44%	189273	14064648	1.35%	-20.48	-13.45
Feb-02	2123	292001	0.73%	8.50%	165159	13985013	1.18%	-22.47	-14.66
Mar-02	2297	300165	0.77%	8.71%	176140	13955969	1.26%	-24.13	-15.67
Apr-02	2578	314294	0.82%	9.02%	181364	13871941	1.31%	-23.78	-15.45
May-02	2616	326601	0.86%	9.25%	188805	13793902	1.37%	-24.62	-15.97
Jun-02	3184	339003	0.92%	9.52%	196493	13708111	1.43%	-25.05	-16.23



Trouble Rate (Percent) (MR-8*) (Parity)-- Interval Zone One and Two

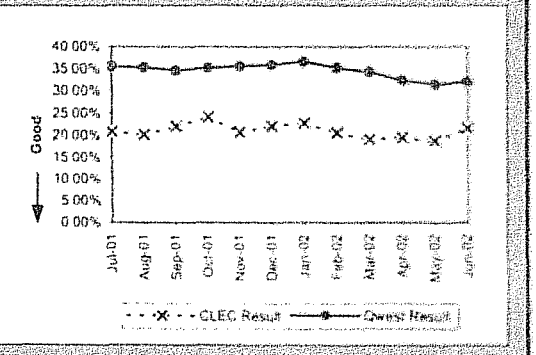
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01									
Aug-01	2656	206176	0.97%	9.82%	240226	14314198	1.68%	-24.72	-16.03
Sep-01	1533	218124	0.70%	8.35%	182627	14285037	1.28%	-23.75	-15.44
Oct-01	1896	236898	0.80%	8.91%	179850	14244813	1.26%	-19.98	-13.15
Nov-01	1695	253032	0.67%	8.13%	167097	14182796	1.18%	-23.67	-15.39
Dec-01	1675	270468	0.62%	7.85%	154052	14128582	1.09%	-23.37	-15.21
Jan-02	1636	284032	0.58%	7.57%	141952	14064648	1.01%	-22.87	-14.91
Feb-02	1361	292001	0.47%	6.82%	122709	13985013	0.88%	-23.55	-15.32
Mar-02	1465	300165	0.49%	6.97%	133612	13955969	0.96%	-26.13	-16.88
Apr-02	1705	314294	0.54%	7.35%	144594	13871941	1.04%	-27.28	-17.59
May-02	1950	326601	0.60%	7.70%	153860	13793902	1.12%	-27.88	-17.95
Jun-02									



Checklist #4 - Unbundled Loop - Analog Repair

Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)– Interval Zone One and Two

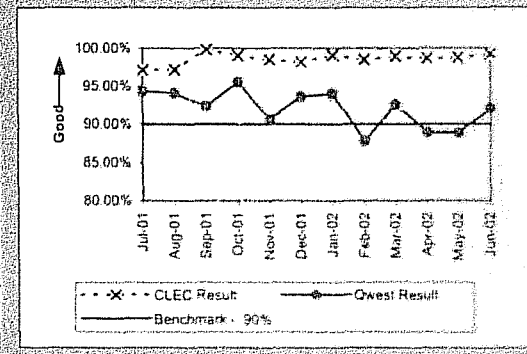
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	703	3359	20 93%	40 68%	160820	452468	35 54%	-17 63	-11 72
Aug-01	812	4000	20 30%	40 22%	163134	462214	35 29%	-19 76	-13 01
Sep-01	686	3104	22 10%	41 49%	120985	349205	34 65%	-14 62	-9 89
Oct-01	1014	4188	24 21%	42 84%	126039	357534	35 25%	-14 87	-10 04
Nov-01	687	3308	20 77%	40 56%	118295	332590	35 57%	-17 69	-11 76
Dec-01	714	3213	22 22%	41 57%	111619	310688	35 93%	-16 11	-10 79
Jan-02	756	3308	22 85%	41 99%	109681	298954	36 69%	-16 42	-10 98
Feb-02	555	2678	20 72%	40 53%	89958	255117	35 26%	-15 66	-10 52
Mar-02	545	2843	19 18%	39 37%	92031	268171	34 32%	-16 91	-11 28
Apr-02	636	3266	19 59%	39 69%	86886	268250	32 39%	-15 4	-10 36
May-02	655	3471	18 87%	39 13%	86780	275585	31 49%	-15 91	-10 67
Jun-02	862	3966	21 73%	41 24%	92452	288945	32 00%	-13 76	-9 37



Checklist #4 - Unbundled Loop - Non-Loaded (2-Wire) Installation

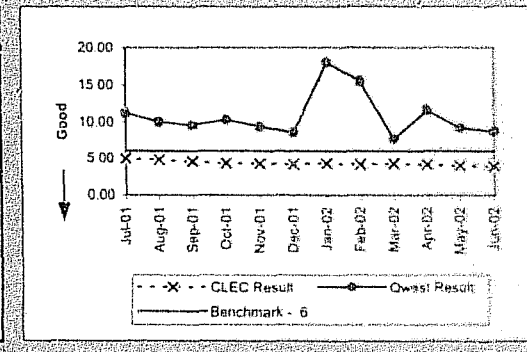
Installation Commitments Met (Percent) (OP-3D) (Benchmark)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	1117	1150	97.13%	16.70%	1944	2060	94.37%	-3.25	-2.98
Aug-01	1518	1562	97.18%	16.55%	1969	2092	94.12%	-3.89	-3.37
Sep-01	831	832	99.88%	3.46%	1529	1655	92.39%	-6.65	-5.04
Oct-01	644	650	99.08%	9.56%	2144	2244	95.54%	-3.84	-3.34
Nov-01	336	341	98.53%	12.02%	1542	1701	90.65%	-4.56	-3.77
Dec-01	829	844	98.22%	13.21%	1342	1433	93.65%	-4.32	-3.63
Jan-02	770	777	99.10%	9.45%	3691	3925	94.04%	-5.44	-4.31
Feb-02	985	1000	98.50%	12.16%	1853	2111	87.78%	-8.53	-6.18
Mar-02	1062	1073	98.97%	10.07%	1572	1697	92.63%	-6.22	-4.78
Apr-02	909	921	98.70%	11.34%	1675	1884	88.91%	-7.75	-5.71
May-02	899	910	98.79%	10.93%	1430	1609	88.88%	-7.6	-5.62
Jun-02	782	788	99.24%	8.69%	1453	1579	92.02%	-6.11	-4.71



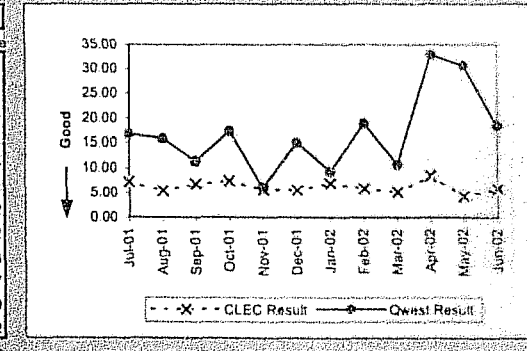
Installation Interval (Average Days) (OP-4D) (Benchmark)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	4227	843	5.01	2.71	23635	2110	11.20	-11.86	-8.21
Aug-01	5992	1238	4.84	2.80	22259	2224	10.01	-13.04	-8.93
Sep-01	3443	752	4.58	2.06	16530	1727	9.57	-10.31	-7.27
Oct-01	2563	591	4.34	2.87	23523	2282	10.31	-8.02	-5.88
Nov-01	1209	283	4.27	2.07	15753	1684	9.35	-6.52	-4.96
Dec-01	2896	685	4.21	1.86	12488	1462	8.54	-9.1	-6.53
Jan-02	2593	602	4.31	2.02	70910	3933	18.03	-20.43	-13.42
Feb-02	2771	668	4.16	2.30	35185	2265	15.53	-15.8	-10.6
Mar-02	3384	790	4.28	1.25	12418	1624	7.65	-9.83	-6.98
Apr-02	3046	740	4.11	1.92	20678	1792	11.54	-8.35	-6.08
May-02	3040	764	3.96	2.05	14144	1540	9.18	-8.02	-5.88
Jun-02	2666	691	3.86	1.28	13622	1562	8.72	-9.84	-6.86



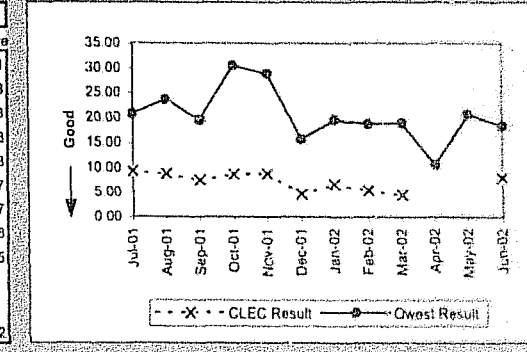
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	260	36	7.22	6.10	2325	139	16.73	-1.87	-2.14
Aug-01	168	31	5.42	6.30	3545	224	15.83	-1.87	-2.14
Sep-01	367	54	6.80	5.65	2242	198	11.32	-1.57	-1.96
Oct-01	324	44	7.36	7.74	2134	123	17.35	-1.9	-2.15
Nov-01	239	43	5.56	5.54	1109	183	6.06	-0.25	-1.15
Dec-01	127	23	5.52	5.04	1953	130	15.02	-1.02	-1.62
Jan-02	187	27	6.93	7.74	3690	395	9.34	-0.7	-1.42
Feb-02	147	25	5.88	8.31	5087	269	18.91	-3.32	-3.02
Mar-02	87	16	5.12	3.38	1399	130	10.76	-1.69	-2.03
Apr-02	119	14	8.50	5.79	7070	215	32.88	-2.75	-2.67
May-02	60	14	4.29	4.18	4964	162	30.64	-2.95	-2.79
Jun-02	52	9	5.78	5.19	2449	133	18.41	-1.68	-2.02



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

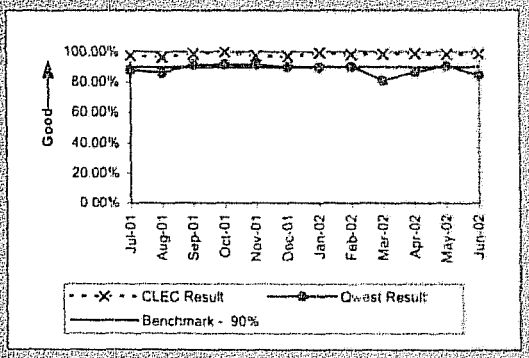
Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	167	18	9.28	7.31	1456	70	20.80	-1.81	-2.1
Aug-01	283	32	8.84	10.23	1913	81	23.62	-2.85	-2.73
Sep-01	157	21	7.48	8.97	1037	53	19.57	-2.02	-2.23
Oct-01	183	21	8.71	7.33	1925	63	30.56	-1.28	-1.78
Nov-01	123	14	8.79	10.35	2249	78	28.83	-2.35	-2.43
Dec-01	75	16	4.69	3.09	582	37	15.73	-2.09	-2.27
Jan-02	40	6	6.67	2.73	860	44	19.55	-1.15	-1.7
Feb-02	27	5	5.40	9.84	468	25	18.72	-2.6	-2.58
Mar-02	9	2	4.50	4.95	114	6	19.00	-0.73	-1.45
Apr-02					106	10	10.60		
May-02					516	25	20.64		
Jun-02	8	1	8.00		147	8	18.38	-0.52	-1.32



Checklist #4 - Unbundled Loop - Non-Loaded (2-Wire) Installation

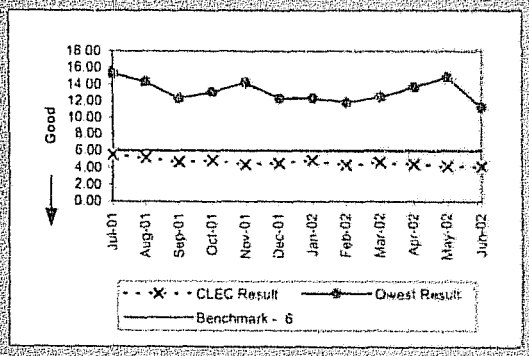
Installation Commitments Met (Percent) (OP-3E) (Benchmark)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	456	469	97.65%	15.13%	388	442	87.78%	-4.55	-3.76
Aug-01	551	571	96.50%	18.38%	397	461	86.12%	-4.79	-3.91
Sep-01	296	300	98.67%	11.47%	481	525	91.62%	-3.51	-3.14
Oct-01	372	372	100.00%	0.00%	450	490	91.84%	-4.34	-3.64
Nov-01	267	274	97.45%	15.78%	409	446	91.70%	-2.71	-2.65
Dec-01	334	344	97.09%	16.80%	297	330	90.00%	-3.07	-2.87
Jan-02	695	704	98.29%	8.40%	315	351	89.74%	-4.82	-3.93
Feb-02	553	562	98.40%	12.55%	472	523	90.25%	-4.52	-3.75
Mar-02	578	587	98.47%	12.29%	344	424	81.13%	-6.95	-5.23
Apr-02	397	401	99.00%	9.94%	342	395	86.58%	-5.14	-4.13
May-02	400	407	98.28%	13.00%	418	461	90.67%	-3.85	-3.34
Jun-02	393	399	98.50%	12.17%	294	349	84.24%	-5.34	-4.25



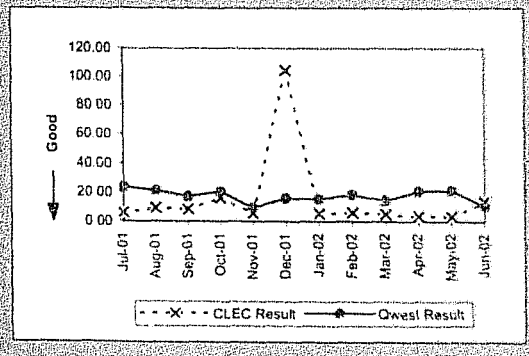
Installation Interval (Average Days) (OP-4E) (Benchmark)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	1426	256	5.57	3.30	7067	462	15.30	-5.37	-4.27
Aug-01	1697	325	5.22	3.20	6828	477	14.31	-8.83	-6.37
Sep-01	845	179	4.72	2.25	6668	540	12.35	-7.21	-5.38
Oct-01	1431	290	4.93	5.20	6784	518	13.10	-7.13	-5.34
Nov-01	874	198	4.41	2.31	7417	520	14.26	-8.91	-6.42
Dec-01	1028	226	4.55	2.16	4108	332	12.37	-5.86	-4.56
Jan-02	2150	434	4.95	1.78	4443	359	12.38	-8	-5.86
Feb-02	1035	239	4.33	1.65	6130	517	11.86	-7.88	-5.79
Mar-02	1670	356	4.69	1.05	5377	428	12.56	-8.89	-6.4
Apr-02	1131	253	4.47	1.60	5307	393	13.73	-5.9	-4.59
May-02	1307	313	4.18	2.16	7013	470	14.92	-11.28	-7.86
Jun-02	1367	328	4.17	1.23	3896	347	11.23	-9.16	-6.57



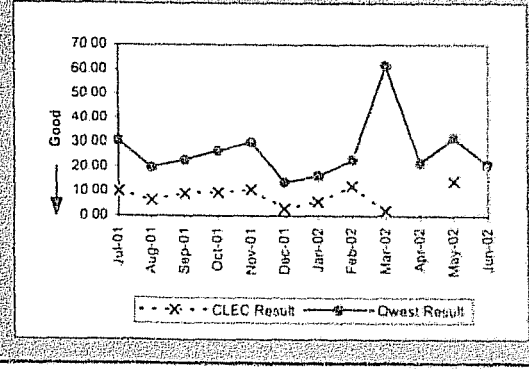
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	169	27	6.26	4.17	1518	63	24.10	-2.08	-2.27
Aug-01	172	18	9.56	6.53	1310	61	21.48	-1.77	-2.08
Sep-01	213	25	8.52	4.86	678	39	17.38	-1.37	-1.83
Oct-01	240	15	16.40	14.29	1070	52	20.58	-0.6	-1.37
Nov-01	186	31	6.06	7.06	1071	111	9.65	-1.18	-1.72
Dec-01	2715	26	104.42	505.75	601	37	16.24	0.24	-0.86
Jan-02	99	17	5.82	3.47	633	40	15.82	-2.14	-2.3
Feb-02	121	19	6.37	7.26	989	53	18.66	-2.13	-2.29
Mar-02	94	18	5.22	4.28	1254	85	14.75	-2.37	-2.44
Apr-02	26	7	3.71	4.07	1072	51	21.02	-0.95	-1.58
May-02	18	5	3.60	2.61	910	42	21.67	-1.72	-2.04
Jun-02	98	7	14.00	26.63	667	59	11.31	0.61	-0.63



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

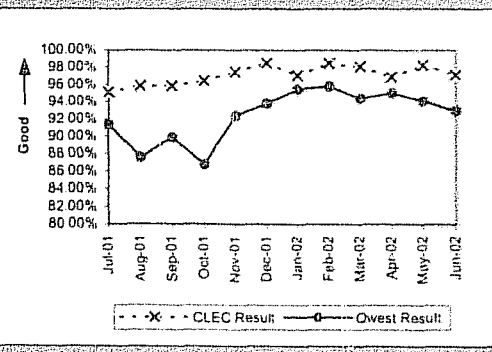
Date	CLEC Num	CLEC Den	CLEC Resu	CLEC Std D	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	60	6	10.00	6.16	1172	38	30.84	-1.04	-1.63
Aug-01	92	14	6.57	3.59	1095	55	19.91	-2.26	-2.38
Sep-01	72	8	9.00	5.07	657	29	22.66	-1.57	-1.95
Oct-01	66	7	9.43	4.65	877	33	26.58	-1.6	-1.97
Nov-01	75	7	10.71	10.19	810	27	30.00	-1.68	-2.02
Dec-01	9	3	3.00	2.00	230	17	13.53	-1.6	-1.97
Jan-02	34	6	5.67	2.58	360	22	16.36	-1.65	-2
Feb-02	12	1	12.00		91	4	22.75	-0.54	-1.33
Mar-02	2	1	2.00		493	8	61.62	-0.63	-1.38
Apr-02					149	7	21.29		
May-02	42	3	14.00	14.42	191	6	31.83	-0.63	-1.38
Jun-02					63	3	21.00		



Checklist #4 - Unbundled Loop - Non-Loaded (2-Wire) Installation

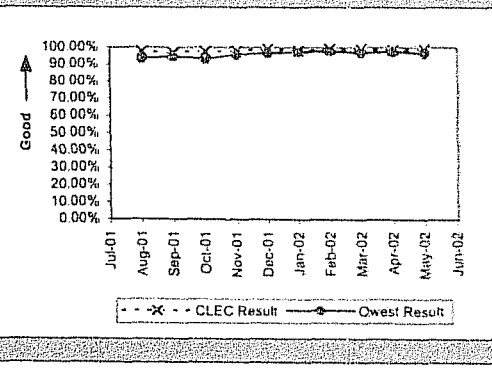
New Service Installation Quality (Percent) (OP-5) (Parity)-- Interval Zone One and Two

		1524	95.15%	21.53%	2729	2986	91.39%	-4.4	-3.68
		1937	95.90%	19.83%	2460	2808	87.61%	-8.51	-6.17
		1959	96.89%	19.80%	2378	2645	89.91%	-6.67	-5.05
		1837	96.50%	18.39%	2318	2671	86.78%	-9.45	-6.74
		1576	97.47%	15.72%	2448	2649	92.41%	-6	-4.65
		1274	98.51%	12.12%	2005	2138	93.78%	-5.53	-4.36
		1446	97.10%	16.79%	3182	3333	95.47%	-2.48	-2.51
		1630	98.47%	12.27%	3700	3862	95.81%	-4.51	-3.74
		1708	98.07%	13.77%	2447	2593	94.37%	-5.15	-4.13
		1566	96.91%	17.29%	2162	2275	95.03%	-2.65	-2.61
		1441	98.27%	13.06%	2101	2233	94.09%	-5.24	-4.19
		1341	97.18%	16.57%	1506	2051	92.93%	-4.76	-3.89



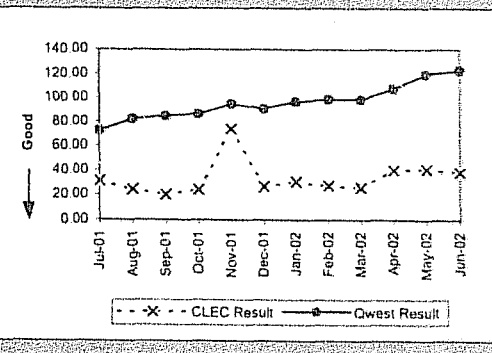
New Service Installation Quality (Percent) (OP-5*) (Parity)-- Interval Zone One and Two

	1844	1927	97.77%	14.77%	2617	2808	93.20%	-6.14	-4.73
	1959	1969	99.95%	17.19%	2505	2645	94.71%	-3.37	-3.05
	1808	1827	97.76%	14.81%	2488	2671	93.15%	-6.01	-4.65
	1543	1576	97.85%	14.52%	2535	2649	95.70%	-3.33	-3.02
	1263	1274	99.14%	9.25%	2065	2138	96.59%	-3.97	-3.41
	1445	1446	98.13%	13.54%	3243	3333	97.30%	-1.63	-1.99
	1627	1630	99.14%	9.21%	3779	3862	97.85%	-3.02	-2.84
	1695	1708	98.95%	10.21%	2512	2593	96.88%	-3.82	-3.32
	1545	1566	98.55%	11.95%	2220	2275	97.58%	-1.93	-2.17
	1431	1441	98.89%	10.46%	2157	2233	96.60%	-3.74	-3.28



Missed Installation Appointments Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

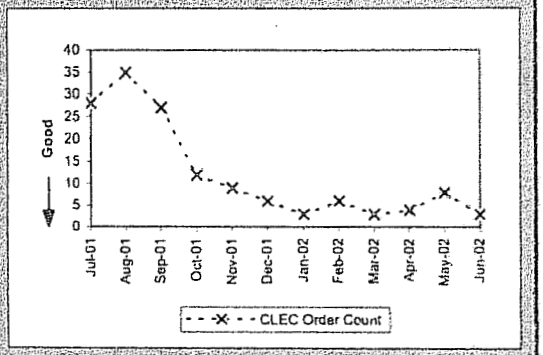
		41	31.27	77.80	38654	534	72.39	-2.47	-2.5
		99	24.63	70.79	42906	622	82.20	-3.8	-3.31
		75	20.29	62.56	41208	485	84.96	-4.55	-3.77
		91	29.31	70.81	42500	490	86.73	-3.54	-3.15
		93	74.05	358.07	46509	491	94.72	-1.12	-1.68
		48	26.81	80.76	40209	540	91.13	-3.43	-3.09
		41	30.71	92.07	52546	541	97.13	-3.37	-3.05
		57	27.44	61.94	58613	594	98.68	-4.41	-3.68
		61	25.95	83.57	62414	631	98.91	-5.05	-4.07
		46	40.11	99.00	59917	556	107.76	-3.63	-3.21
		42	48.69	103.47	65186	545	119.61	-4.16	-3.53
		53	38.45	102.63	68375	556	122.98	-4.57	-3.78



Checklist #4 - Unbundled Loop - Non-Loaded (2-Wire) Installation

Count of Pending Orders Delayed for Facilities Reasons Unbundled Loop - 2 Wire Non-Loaded (OP-15B) (Diagnostic)

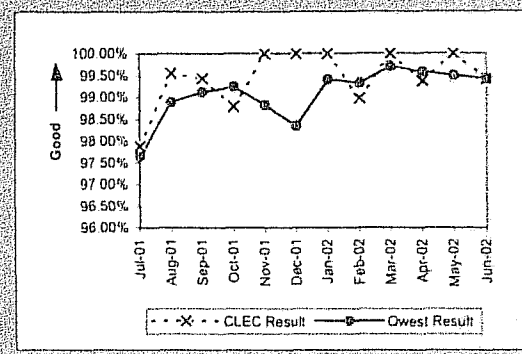
Date	CLEC Order Count
Jul-01	28
Aug-01	35
Sep-01	27
Oct-01	12
Nov-01	9
Dec-01	6
Jan-02	3
Feb-02	6
Mar-02	3
Apr-02	4
May-02	8
Jun-02	3



Checklist #4 - Unbundled Loop - Non-Loaded (2-Wire) Repair

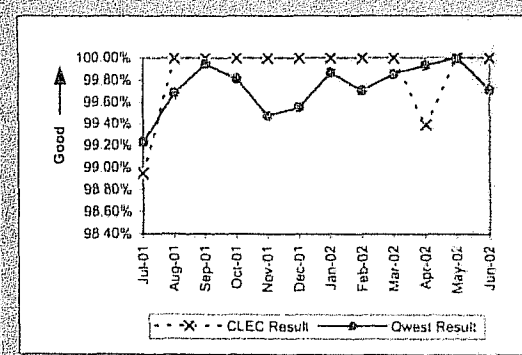
Percent Cleared within 24 hours (Percent) (MR-3D) (Parity)-- Interval Zone One

			97.55%	14.36%	2160	2212	97.65%	-0.26	-1.16
			99.56%	9.62%	2496	2524	98.89%	-0.92	-1.56
			98.44%	7.45%	1819	1835	99.13%	-0.43	-1.26
			99.86%	10.91%	2106	2122	99.25%	0.65	-0.61
			100.00%	0.00%	1678	1698	98.82%	-1.26	-1.77
			100.00%	0.00%	1316	1338	98.36%	-1.31	-1.8
			100.00%	0.00%	1517	1526	99.41%	-0.79	-1.48
			99.96%	19.05%	1347	1356	99.34%	0.43	-0.74
			100.00%	0.00%	1356	1360	99.71%	-0.57	-1.35
			99.38%	7.88%	1433	1439	99.58%	0.39	-0.77
			100.00%	0.00%	1404	1411	99.50%	-0.78	-1.48
			99.42%	7.62%	1389	1397	99.43%	0.06	-0.96



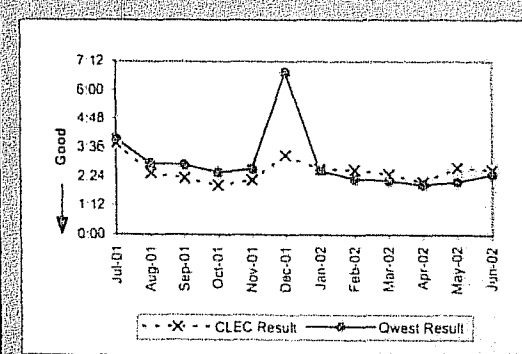
Percent Cleared within 48 hours (Percent) (MR-4D) (Parity)-- Interval Zone One

			98.85%	10.19%	2208	2225	99.24%	0.54	-0.67
			100.00%	0.00%	2526	2533	99.68%	-0.82	-1.5
			100.00%	0.00%	1848	1849	99.95%	-0.3	-1.18
			100.00%	0.00%	2135	2139	99.81%	-0.54	-1.33
			100.00%	0.00%	1703	1712	99.47%	-0.85	-1.51
			100.00%	0.00%	1344	1350	99.56%	-0.68	-1.41
			100.00%	0.00%	1544	1546	99.87%	-0.37	-1.23
			100.00%	0.00%	1364	1368	99.71%	-0.52	-1.32
			100.00%	0.00%	1370	1372	99.85%	-0.41	-1.25
			99.30%	7.76%	1450	1457	99.93%	1.31	-0.2
			100.00%	0.00%	1424	1424	100.00%	N/A	N/A
			100.00%	0.00%	1402	1406	99.72%	-0.67	-1.41



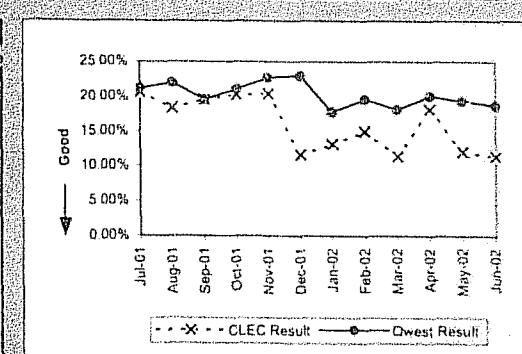
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

			3:42	11:25	4815:20	2225	3:58	-0.18	-1.11
			2:33	3:26	7459:51	2533	2:57	-0.7	-1.42
			2:21	3:07	5391:35	1849	2:53	-1.39	-1.64
			2:03	2:58	5534:52	2139	2:35	-1.2	-1.73
			2:16	2:41	4650:52	1712	2:43	-0.8	-1.48
			5:16	4:24	9122:46	1350	6:45	-0.33	-1.2
			2:43	3:27	4100:56	1546	2:39	0.05	-0.97
			3:40	4:24	3175:42	1368	2:19	0.79	-0.52
			2:51	3:19	3054:34	1372	2:14	0.63	-0.62
			2:12	3:26	3037:42	1457	2:05	0.37	-0.77
			2:47	2:55	3122:43	1424	2:12	1.84	0.12
			3:43	3:54	3505:22	1406	2:30	0.5	-0.69



Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

			29.61%	40.40%	471	2226	21.16%	-0.21	-1.13
			18.34%	38.70%	558	2537	21.99%	-1.28	-1.78
			19.55%	39.66%	362	1852	19.55%	0.02	-0.99
			20.24%	40.16%	451	2140	21.07%	-0.26	-1.16
			20.41%	40.30%	389	1714	22.70%	-0.64	-1.39
			11.61%	32.03%	310	1350	22.96%	-2.75	-2.67
			13.16%	33.80%	274	1546	17.72%	-1.23	-1.75
			15.00%	35.71%	266	1368	19.59%	-1.12	-1.68
			11.38%	31.76%	249	1373	18.14%	-1.86	-2.13
			13.18%	33.57%	292	1458	20.03%	-0.56	-1.34
			12.06%	32.56%	275	1424	19.31%	-2.08	-2.27
			11.43%	31.82%	263	1406	18.71%	-2.33	-2.42



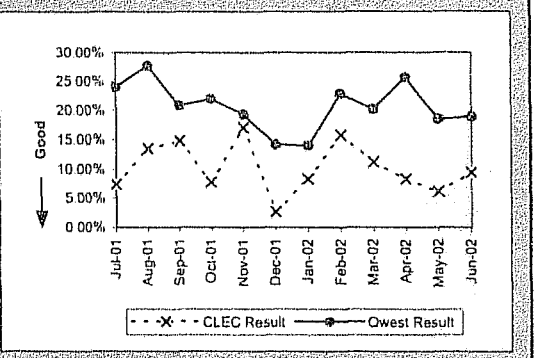
Checklist #4 - Unbundled Loop - Non-Loaded (2-Wire) Repair

Mean Time to Restore Trouble Minutes (MR-1E) (Parity) - Interval Zone One

Checklist #4 - Unbundled Loop - Non-Loaded (2-Wire) Repair

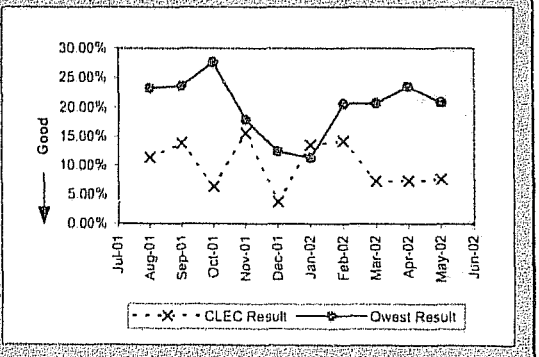
Service Provider Percent Within Interval (SPPI-2E) (Parity) - Interval Zone Two

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
				70	291	24.06%	-2.86	-2.74
				100	360	27.78%	-2.26	-2.37
				61	259	20.85%	-0.99	-1.6
				69	310	22.04%	-2.27	-2.38
				39	202	19.31%	-0.33	-1.2
				23	162	14.20%	-1.81	-2.1
				29	207	14.01%	-1.02	-1.62
				48	210	22.86%	-0.95	-1.58
				40	198	20.20%	-1.53	-1.93
				53	206	25.73%	-2.91	-2.77
				38	205	18.54%	-2.24	-2.36
				42	227	18.02%	-1.8	-2.09



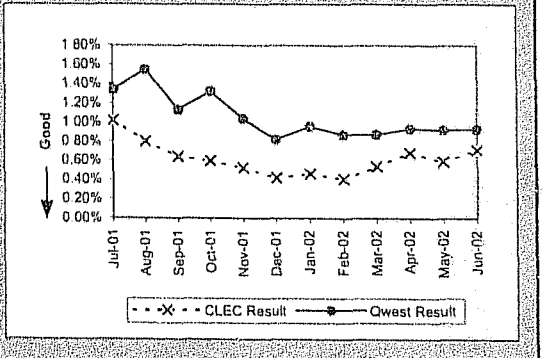
Service Provider Percent Within Interval (SPPI-2E) (Parity) - Interval Zone Two

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
				43	185	23.24%	-1.52	-1.92
				26	110	23.64%	-1.27	-1.77
				44	159	27.67%	-2.42	-2.47
				16	89	17.98%	-0.3	-1.18
				10	80	12.50%	-1.16	-1.7
				10	88	11.36%	0.27	-0.83
				20	97	20.62%	-0.73	-1.44
				23	111	20.72%	-1.81	-2.1
				28	119	23.53%	-2.32	-2.41
				23	110	20.91%	-1.74	-2.06



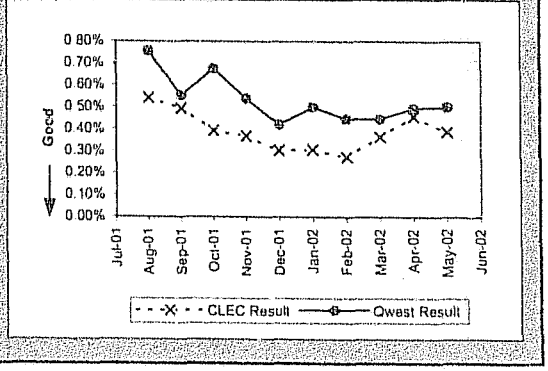
Service Provider Percent Within Interval (SPPI-2E) (Parity) - Interval Zone One and Two

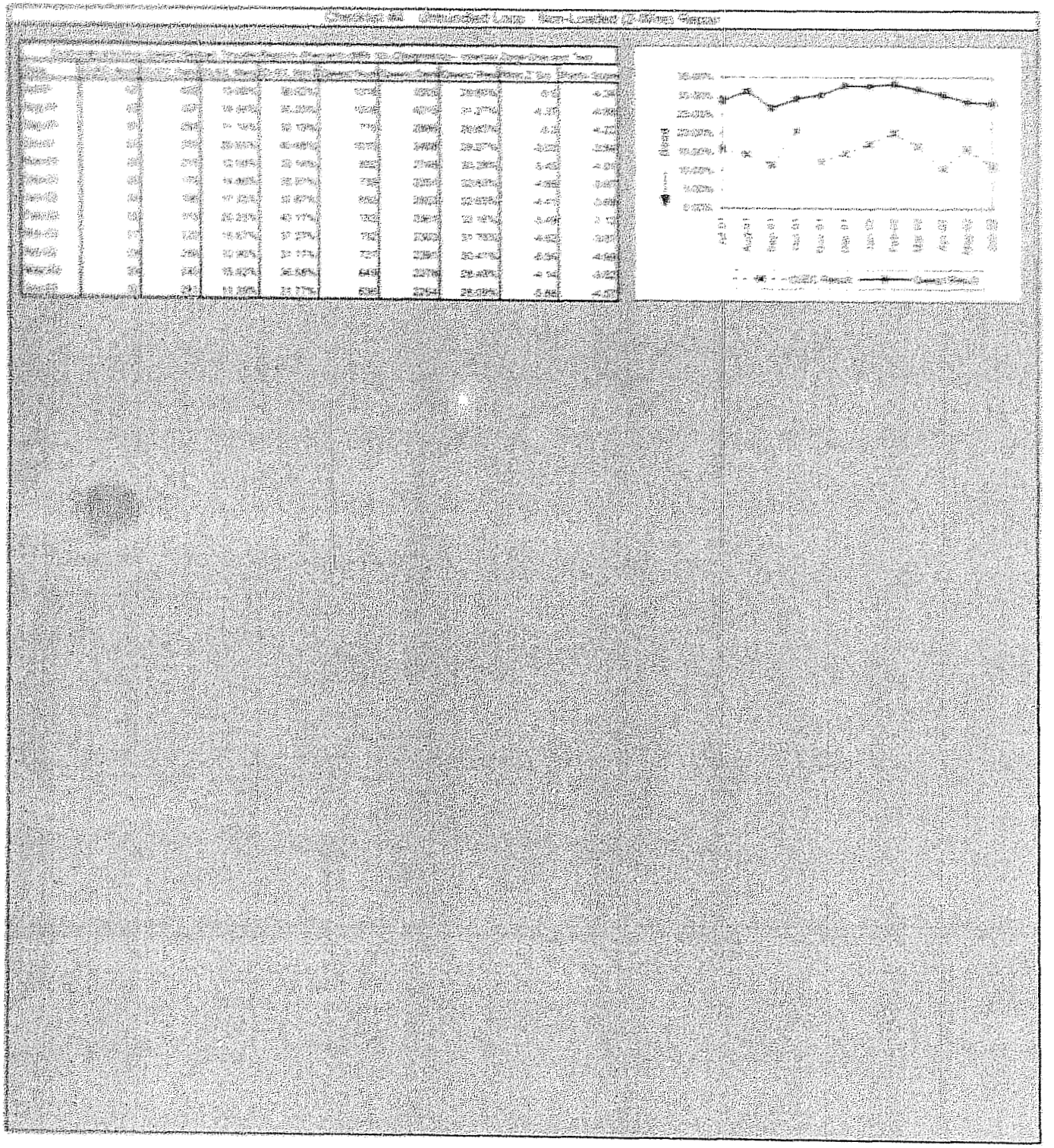
				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
				2511	187909	1.34%	-4.76	-3.89
				2077	187280	1.11%	-10.45	-7.35
				2111	186429	1.13%	-8.08	-5.91
				2453	185014	1.33%	-11.12	-7.76
				1916	184334	1.04%	-8.78	-6.34
				1517	183312	0.83%	-7.71	-5.69
				1753	182572	0.96%	-8.64	-6.25
				1578	180684	0.87%	-8.43	-6.13
				1571	178951	0.88%	-6.15	-4.74
				1664	177337	0.94%	-4.45	-3.71
				1629	175766	0.93%	-5.92	-4.6
				1626	174155	0.93%	-3.9	-3.37



Service Provider Percent Within Interval (SPPI-2E) (Parity) - Interval Zone One and Two

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
				1476	187280	0.76%	-4.3	-3.62
				1079	186329	0.55%	-1.38	-1.84
				1249	185014	0.68%	-6.01	-4.65
				993	184334	0.54%	-4.02	-3.45
				710	183312	0.42%	-3.08	-2.87
				912	182572	0.50%	-4.63	-3.82
				804	180684	0.45%	-4.3	-3.62
				797	178951	0.45%	-2.06	-2.25
				674	177337	0.40%	-0.88	-1.52
				680	175766	0.50%	-2.7	-2.64

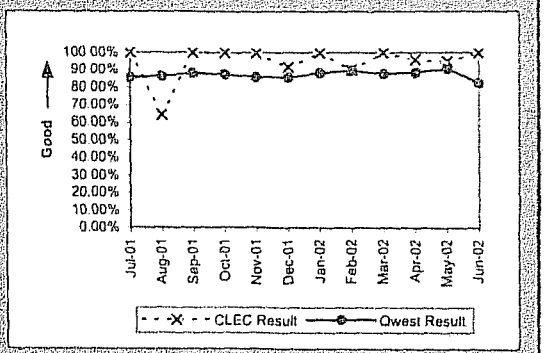




Checklist #4 - Unbundled Loop - Non-Loaded (4-Wire) Installation

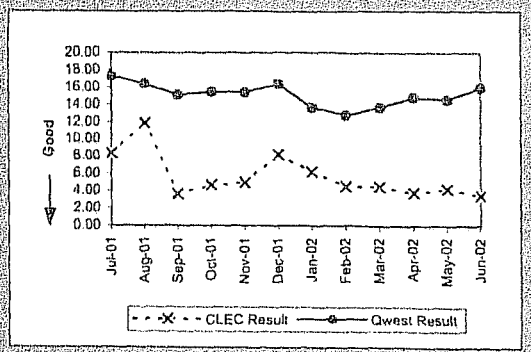
Percent Installed Within Benchmark (OP-3) (Parity)-- Interval Zone One

				Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Score
				2515	2945	85.43%	-1.3	-1.79
				2953	3432	86.33%	2.07	0.26
				2852	3251	88.03%	-0.9	-1.55
				3120	3571	87.37%	-1	-1.61
				2809	3258	86.22%	-0.4	-1.24
				2516	3066	85.60%	-0.6	-1.36
				3415	3867	88.31%	-0.63	-1.38
				3238	3613	89.62%	-0.04	-1.02
				2771	3159	87.72%	-1.4	-1.85
				3104	3505	88.56%	-1.16	-1.71
				3284	3627	90.54%	-0.68	-1.41
				2896	3495	82.86%	-1.98	-2.2



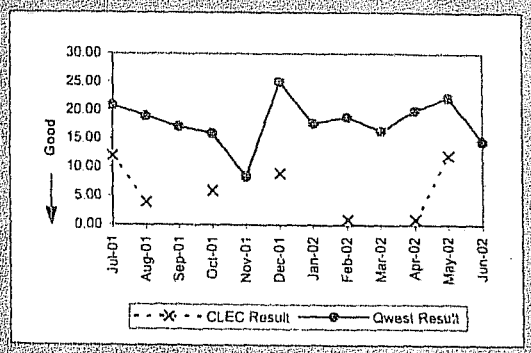
Percent Installed Within Benchmark (Average Days) (OP-4D) (Parity)-- Interval Zone One

				Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Score
				73506	4244	17.32	-1.86	-2.13
				76695	4664	16.44	-1.07	-1.65
				66905	4418	15.14	-1.45	-1.88
				70727	5160	15.45	-1.82	-2.11
				68216	4413	15.46	-0.74	-1.45
				63510	3867	16.42	-1.38	-1.84
				64286	4698	13.68	-1.24	-1.75
				55946	4360	12.83	-2.32	-2.41
				52335	3803	13.76	-1.69	-2.03
				65915	4425	14.90	-3.12	-2.9
				67058	4575	14.66	-2.44	-2.48
				72319	4518	16.01	-3.36	-3.04



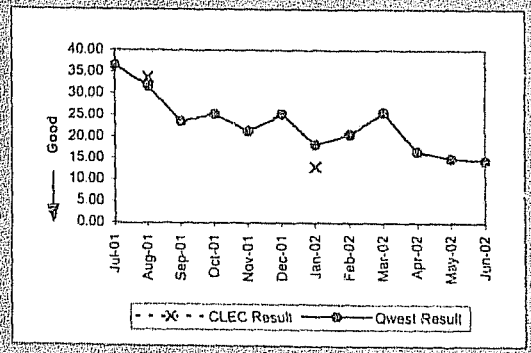
Percent Installed Within Benchmark (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

				Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Score
				17222	821	20.98	-0.73	-1.45
				15908	834	19.07	-1.07	-1.65
				12179	711	17.13		
				14310	896	15.97	-0.81	-1.49
				13363	1598	8.36		
				14666	586	25.03	-0.42	-1.25
				10385	587	17.69		
				8683	461	18.84	-0.86	-1.52
				7091	488	16.38		
				10616	531	19.99	-0.81	-1.49
				10826	487	22.23	-0.27	-1.17
				10786	739	14.59		



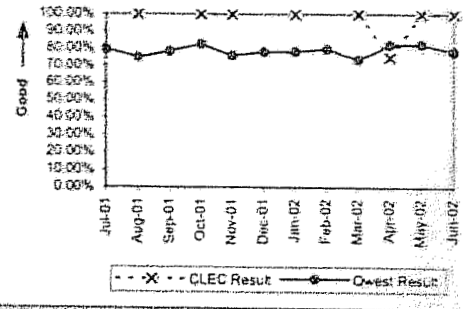
Percent Installed Within Benchmark (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

				Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Score
				5108	140	36.49		
				4147	131	31.66	1.46	-0.11
				2230	95	23.47		
				2744	109	25.17		
				2965	139	21.33		
				2495	99	25.20		
				1634	90	18.16	-0.29	-1.18
				700	34	20.59		
				1175	46	25.54		
				792	48	16.50		
				792	53	14.94		
				939	65	14.45		



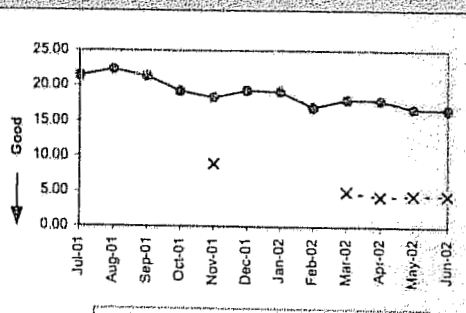
Non-Loaded (4-Wire) Installation

						Parity Score
					-0.58	-1.35
					-0.46	-1.26
					-0.56	-1.34
					-0.74	-1.45
					-0.6	-1.36
					0.39	-0.76
					-0.65	-1.4
					-1.57	-1.96



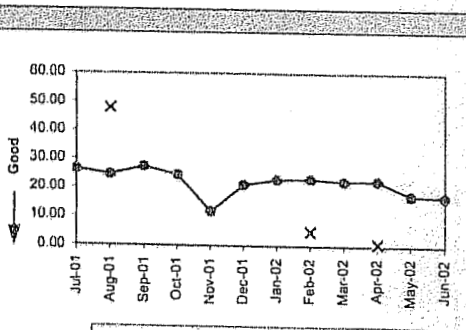
Interval Zone Two

					Parity Score
	2401	21.40			
	2537	22.30			
	2185	21.30			
	2046	19.25			
	2732	18.35	-0.52	-1.32	
	2413	19.34			
	2356	19.21			
	2258	16.98			
	2221	18.05	-0.69	-1.42	
	2598	17.94	-1.47	-1.9	
	3112	16.79	-1.26	-1.77	
	2663	16.67	-1.14	-1.69	



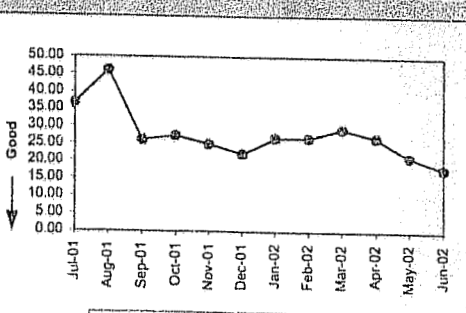
Interval Zone Two

					Parity Score
	817	26.54			
	723	24.66	2.75	0.67	
	560	27.43			
	615	24.46			
	1149	11.91			
	513	21.16			
	515	22.93			
	455	23.23	-0.73	-1.44	
	532	22.32			
	453	22.60	-0.81	-1.49	
	548	17.55			
	556	17.09			



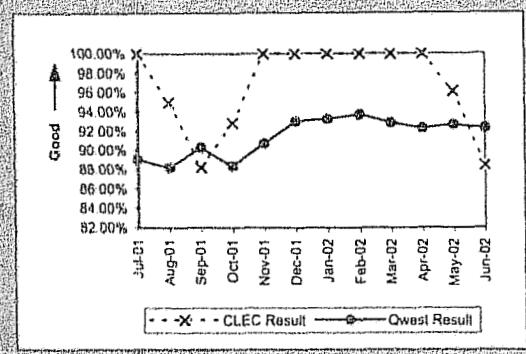
Interval Zone Two

					Parity Score
	94	36.78			
	116	46.23			
	80	26.11			
	64	27.35			
	113	25.03			
	59	22.21			
	61	26.80			
	52	25.79			
	49	29.41			
	42	26.95			
	47	21.34			
	51	18.06			

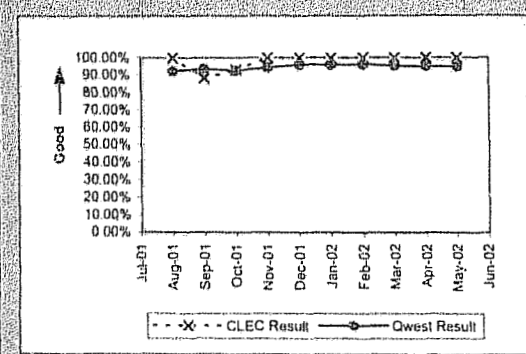


Checklist #6 - Unbundled Loop - Non-Loaded (4-Wire) Installation

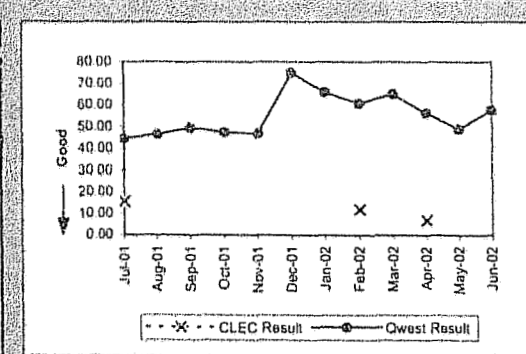
							-1.44	-1.66
							-0.94	-1.57
							0.35	-0.79
							-0.52	-1.32
							-1.01	-1.62
							-0.82	-1.5
							-0.89	-1.54
							-0.82	-1.5
							-1.04	-1.63
							-1.35	-1.82
							-0.68	-1.41
							0.74	-0.55

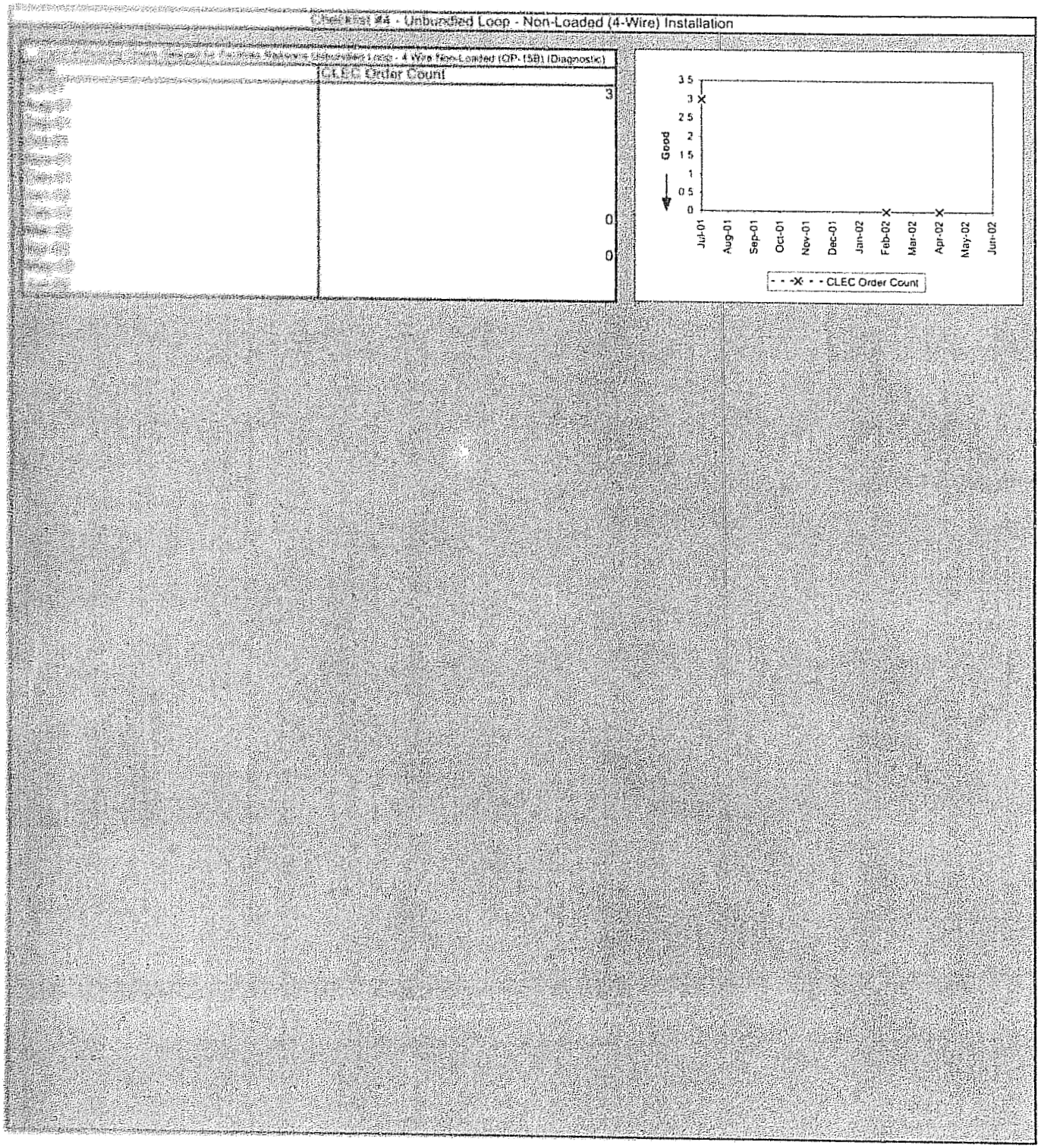


							-1.28	-1.78
							0.86	-0.48
							-0.05	-1.03
							-0.75	-1.47
							-0.62	-1.38
							-0.68	-1.41
							-0.63	-1.39
							-0.84	-1.51
							-1.07	-1.65
							-1.18	-1.71



							-0.95	-1.58
							-1.1	-1.67
							-0.53	-1.33



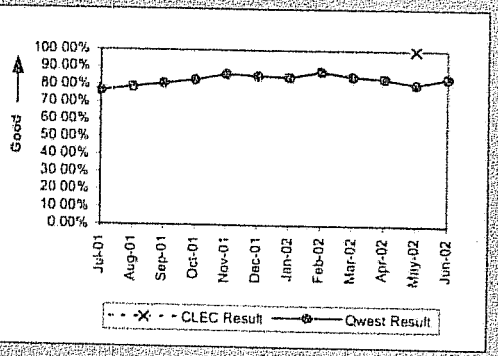

Checklist #4 - Unbundled Loop - Non-Loaded (4-Wire) Installation
CLEC Order Count
3
0
0
Good
3.5
3
2.5
2
1.5
1
0.5
0
Jul-01
Aug-01
Sep-01
Oct-01
Nov-01
Dec-01
Jan-02
Feb-02
Mar-02
Apr-02
May-02
Jun-02
CLEC Order Count

Checklist #4 - Unbundled Loop - Non-Loaded (4-Wire) Repair

Qwest Test 84 - Unbundled Loop - Non-Loaded (4-Wire) Repair

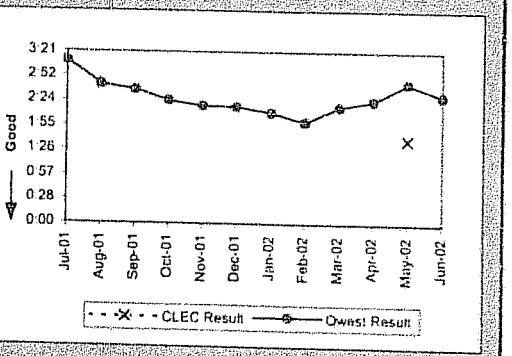
Qwest Retail Analog (Parity) - Interval Zone Two

Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
2143	2800	76.68%		
2269	2859	79.92%		
1684	2078	81.04%		
1769	2240	83.21%		
1525	1993	86.60%		
1468	1719	85.40%		
1461	1723	84.79%		
1470	1668	88.13%		
1603	1868	85.22%		
1784	2123	84.03%		
1755	2182	80.89%	-0.84	-1.51
2046	2419	84.33%		



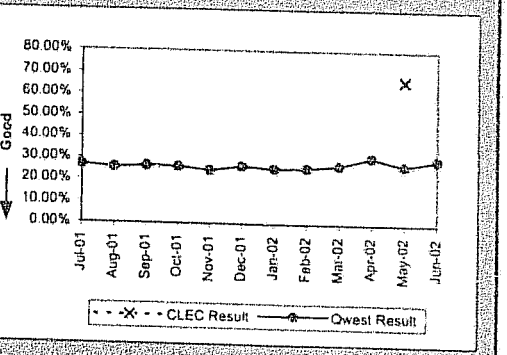
Qwest Retail Analog (Parity) - Interval Zone Two

Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
8804.17	2800	3.11		
7672.43	2859	2.43		
5430.33	2078	2.37		
5384.11	2240	2.24		
4164.27	1993	2.18		
3994.24	1719	2.17		
3729.56	1723	2.10		
3313.04	1668	1.99		
4315.22	1868	2.17		
5083.42	2123	2.24		
3993.32	2182	2.45	-0.51	-1.31
5761.23	2419	2.30		



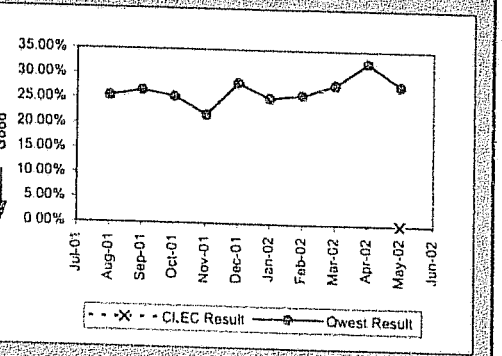
Qwest Retail Analog (Parity) - Interval Zone Two

Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
753	2800	26.89%		
744	2859	25.99%		
550	2078	26.47%		
587	2240	26.21%		
493	1993	24.74%		
458	1719	26.64%		
440	1723	25.54%		
433	1668	25.90%		
513	1868	27.17%		
656	2123	30.90%		
595	2182	27.27%	1.28	-0.22
725	2419	29.97%		



Qwest Retail Analog (MICRO*) (Parity) - Interval Zone Two

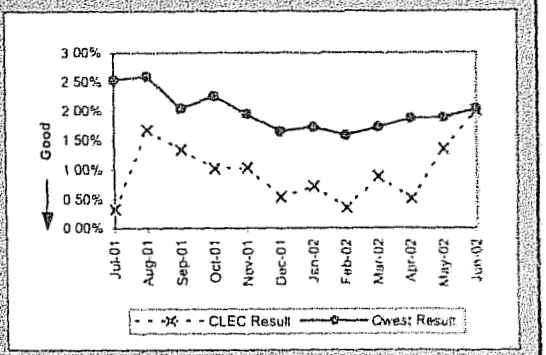
Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
461	1802	25.56%		
353	1323	26.68%		
349	1369	25.49%		
262	1191	22.00%		
297	1049	28.31%		
262	1033	25.36%		
265	1032	26.07%		
344	1222	28.15%		
467	1431	32.63%		
431	1533	28.11%	-0.63	-1.38



Checklist #4 - Unbundled Loop - Non-Loaded (4-Wire) Repair

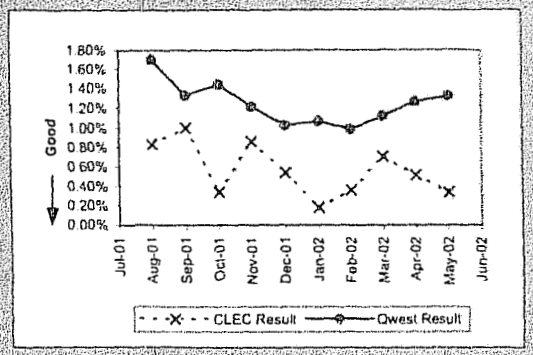
Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	5	600	0.33%	5.76%	7878	310507	2.54%	-3.43	-3.09
	9	547	1.68%	12.83%	8122	312764	2.60%	-1.41	-1.86
	7	526	1.34%	11.51%	6447	314738	2.05%	-1.22	-1.74
	6	585	1.03%	10.08%	7120	315764	2.25%	-2	-2.22
	6	578	1.04%	10.14%	6182	318019	1.94%	-1.58	-1.96
	3	554	0.54%	7.34%	5280	320210	1.65%	-2.05	-2.24
	4	553	0.72%	8.47%	5549	322799	1.72%	-1.8	-2.09
	3	556	0.36%	5.99%	5105	322988	1.58%	-2.31	-2.4
	5	565	0.88%	9.37%	5519	322151	1.71%	-1.52	-1.92
	4	554	0.54%	7.15%	6018	321850	1.87%	-2.42	-2.47
	8	592	1.35%	11.55%	6075	322674	1.88%	-0.95	-1.58
	10	605	1.98%	13.94%	6585	325120	2.03%	-0.07	-1.04



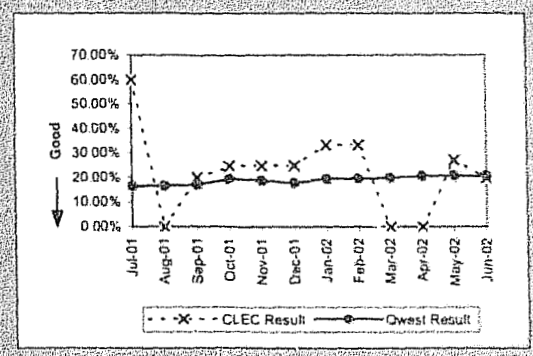
Trouble Rate (Percent) (MR-8*) (Parity)-- Interval Zone One and Two

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	5	597	0.84%	9.11%	5317	312764	1.70%	-1.63	-1.99
	6	590	1.01%	9.96%	4188	314738	1.33%	-0.69	-1.42
	2	585	0.34%	5.84%	4551	315764	1.44%	-2.23	-2.36
	3	579	0.67%	9.26%	3875	318019	1.22%	-0.77	-1.47
	3	554	0.54%	7.34%	3305	320210	1.03%	-1.14	-1.69
	6	565	0.18%	4.25%	3466	322799	1.07%	-2.04	-2.24
	2	556	0.36%	5.99%	3196	322988	0.99%	-1.5	-1.91
	4	565	0.71%	8.38%	3623	322151	1.12%	-0.94	-1.57
	3	554	0.54%	7.15%	4080	321850	1.27%	-1.63	-1.99
	2	592	0.34%	5.80%	4263	322674	1.32%	-2.09	-2.27



Trouble and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)-- Interval Zone One and Two

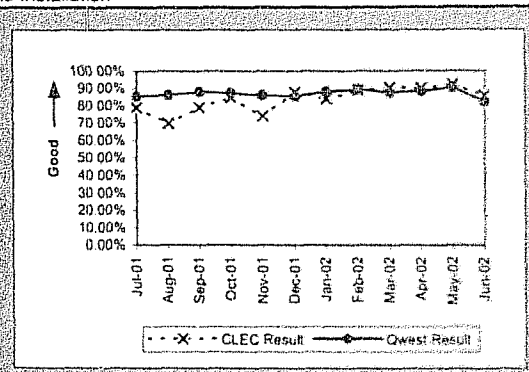
	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	3	5	60.00%	48.99%	1560	9436	16.53%	2.09	0.27
	0	10	0.00%	0.00%	1635	9757	16.76%	-1.42	-1.86
	2	10	20.00%	40.00%	1321	7768	17.01%	0.3	-0.82
	2	8	25.00%	43.30%	1740	8850	19.64%	0.41	-0.75
	2	8	25.00%	43.30%	1436	7618	18.85%	0.47	-0.72
	1	4	25.00%	43.30%	1149	6429	17.87%	0.39	-0.76
	2	6	33.33%	47.14%	1351	6900	19.58%	0.79	-0.52
	2	6	33.33%	47.14%	1244	6349	19.59%	0.55	-0.67
	0	5	0.00%	0.00%	1378	6897	19.98%	-1.12	-1.68
	0	5	0.00%	0.00%	1559	7577	20.58%	-0.88	-1.54
	3	11	27.27%	44.54%	1597	7672	20.82%	0.54	-0.67
	3	15	20.00%	40.00%	1727	8312	20.78%	-0.07	-1.05



Checklist #4 - Unbundled Loop - DS1 Capable Installation

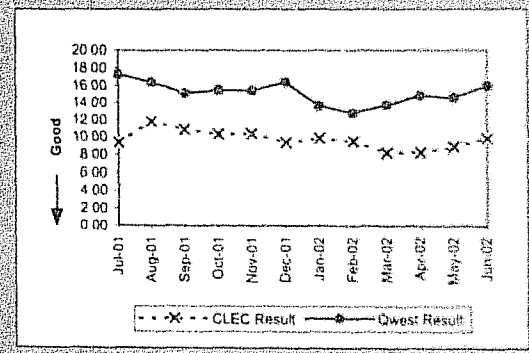
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	91	115	79.13%	40.64%	2516	2945	85.43%	1.8	0.09
Aug-01	102	146	69.86%	45.89%	2963	3432	86.33%	5.01	2.05
Sep-01	88	111	79.28%	40.53%	2862	3251	88.03%	2.58	0.57
Oct-01	163	192	84.90%	35.81%	3120	3571	87.37%	1	-0.39
Nov-01	95	129	74.17%	43.77%	2809	3258	86.22%	3.42	1.08
Dec-01	167	184	68.04%	32.45%	2616	3056	85.60%	-0.92	-1.56
Jan-02	175	208	84.13%	36.54%	3415	3867	88.31%	1.76	0.07
Feb-02	221	248	89.11%	31.15%	3238	3613	89.62%	0.27	-0.83
Mar-02	287	317	90.54%	29.27%	2771	3159	87.72%	-1.46	-1.89
Apr-02	337	362	90.33%	29.55%	3104	3505	88.56%	-1.01	-1.61
May-02	342	342	92.35%	26.58%	3284	3627	90.54%	-1.16	-1.7
Jun-02	269	312	86.22%	34.47%	2896	3495	82.86%	-1.51	-1.92



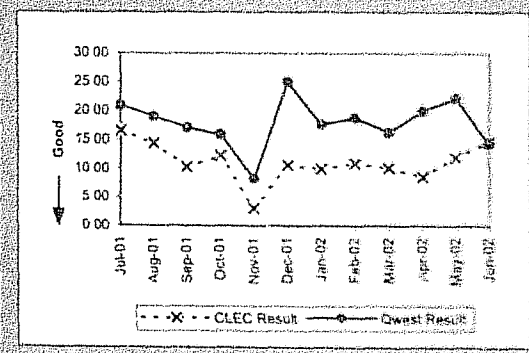
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	2139	228	9.38	10.55	73506	4244	17.32	-6.76	-5.11
Aug-01	2616	236	11.84	11.46	76695	4664	16.44	-4.2	-3.55
Sep-01	2130	196	10.87	8.86	66905	4418	15.14	-4.27	-3.6
Oct-01	2443	236	10.35	9.47	79727	5160	15.45	-5.28	-4.21
Nov-01	1908	186	10.47	8.91	68216	4413	15.46	-4.7	-3.85
Dec-01	2615	283	9.45	5.48	63510	3867	16.42	-6.35	-4.86
Jan-02	3125	315	9.92	6.11	64286	4698	13.68	-5.38	-4.27
Feb-02	3040	319	9.56	6.20	55946	4360	12.83	-5.03	-4.06
Mar-02	2511	304	8.26	4.43	52335	3803	13.76	-5.66	-4.44
Apr-02	3166	382	8.29	3.96	65915	4425	14.90	-9.7	-6.9
May-02	3409	381	8.95	5.04	67058	4575	14.66	-6.75	-5.1
Jun-02	2818	284	9.92	9.70	72319	4518	16.01	-8.46	-6.14



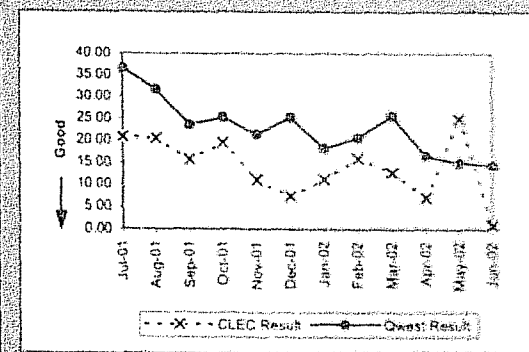
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	946	57	16.60	15.97	17222	821	20.98	-1.51	-1.92
Aug-01	940	65	14.46	13.59	15908	834	19.07	-1.47	-1.89
Sep-01	497	48	10.35	10.85	12179	711	17.13	-2.2	-2.34
Oct-01	567	46	12.33	11.76	14313	896	15.97	-1.14	-1.69
Nov-01	499	140	3.06	10.05	13363	1598	8.36	-3.62	-3.2
Dec-01	564	51	10.67	10.43	14666	586	25.03	-2.55	-2.55
Jan-02	647	64	10.02	9.07	10385	587	17.69	-2.71	-2.65
Feb-02	780	71	10.99	9.59	8683	461	18.84	-2.98	-2.81
Mar-02	468	46	10.20	7.35	7991	488	16.38	-1.07	-1.65
Apr-02	459	54	8.69	5.64	10616	531	19.99	-3.37	-3.05
May-02	605	50	12.10	14.06	10826	487	22.23	-1.83	-2.11
Jun-02	950	64	14.84	19.42	10785	739	14.59	0.19	-0.89



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

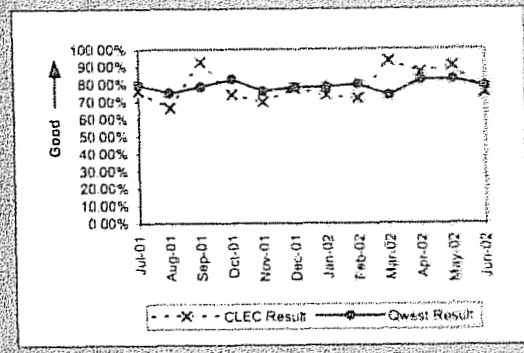
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	457	22	20.77	16.36	5108	140	36.49	-1.84	-2.12
Aug-01	678	43	20.42	12.33	4147	131	31.66	-2.26	-2.37
Sep-01	314	20	15.79	15.46	2230	95	23.47	-1.17	-1.71
Oct-01	467	24	19.46	18.06	2744	109	25.17	-1.17	-1.71
Nov-01	265	24	11.08	12.94	2965	139	21.33	-2.02	-2.23
Dec-01	102	14	7.29	4.68	2495	99	25.20	-2.72	-2.65
Jan-02	276	25	11.12	12.51	1634	90	18.16	-1.75	-2.06
Feb-02	16	1	16.00		700	34	20.59	-0.27	-1.16
Mar-02	51	4	12.75	17.00	1175	46	25.54	-0.91	-1.56
Apr-02	7	1	7.00		792	48	16.50	-0.47	-1.29
May-02	25	1	25.00		792	53	14.94	0.81	-0.51
Jun-02	1	1	1.00		939	65	14.45	-0.87	-1.53



Checklist #4 - Unbundled Loop - DS1 Capable Installation

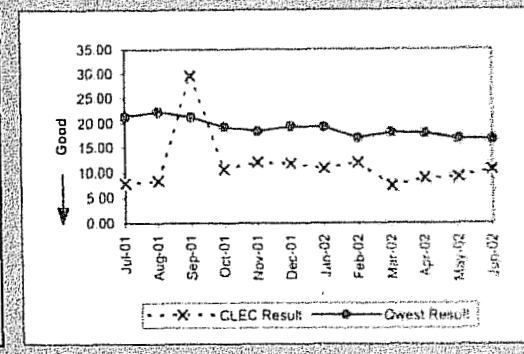
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
[illegible]	19	17	76.47%	42.42%	1317	1651	79.77%	0.37	-0.78
[illegible]	12	18	66.67%	47.14%	1226	1634	75.03%	0.81	-0.51
[illegible]	13	14	92.86%	25.75%	1135	1445	78.55%	-1.3	-1.79
[illegible]	23	31	74.19%	43.76%	1536	1859	82.63%	1.19	-0.28
[illegible]	14	20	70.00%	45.83%	1517	1994	76.08%	0.64	-0.61
[illegible]	21	27	77.78%	41.57%	1367	1749	78.16%	0.08	-0.95
[illegible]	17	23	73.91%	43.91%	1386	1767	78.44%	0.54	-0.67
[illegible]	31	43	72.09%	44.85%	1498	1878	79.77%	1.21	-0.26
[illegible]	43	46	93.48%	24.69%	1315	1785	73.67%	-3.01	-2.83
[illegible]	53	61	86.89%	33.76%	1646	2000	82.30%	-0.92	-1.56
[illegible]	131	145	90.34%	29.53%	2038	2472	82.44%	-2.43	-2.48
[illegible]	35	46	75.00%	43.30%	1685	2150	78.37%	0.58	-0.65



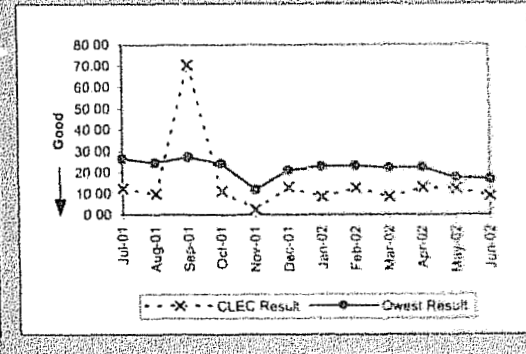
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
[illegible]	183	23	7.96	12.57	52783	2467	21.40	-3.06	-2.86
[illegible]	135	16	8.44	7.75	56572	2537	22.30	-2.34	-2.43
[illegible]	605	27	29.63	46.41	44831	2105	21.30	2.01	0.22
[illegible]	269	28	10.68	5.83	50939	2646	19.25	-2.11	-2.28
[illegible]	254	21	12.10	8.03	50135	2732	18.35	-1.59	-1.97
[illegible]	467	39	11.85	6.80	46661	2413	19.34	-2.78	-2.69
[illegible]	427	39	10.95	5.41	45263	2356	19.21	-2.59	-2.57
[illegible]	683	57	12.05	9.21	38339	2258	16.98	-2.11	-2.28
[illegible]	376	51	7.37	2.99	40983	2271	18.05	-3.97	-3.41
[illegible]	662	74	8.92	6.61	46620	2598	17.94	-4.79	-3.91
[illegible]	1389	152	9.20	7.09	52256	3112	16.79	-6.62	-5.02
[illegible]	616	56	10.68	6.07	44380	2663	16.67	-3	-2.82



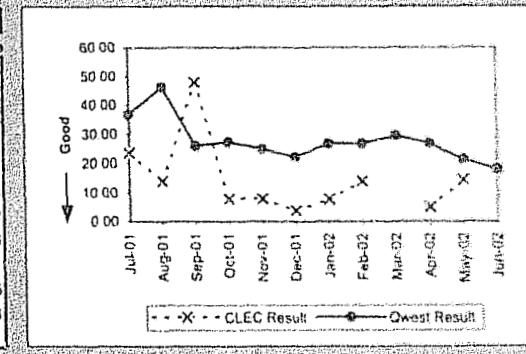
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
[illegible]	87	7	12.43	9.64	16376	617	26.54	-1.4	-1.85
[illegible]	40	4	10.00	10.23	17627	723	24.66	-1.07	-1.65
[illegible]	704	10	70.40	54.48	15360	560	27.43	1.79	0.09
[illegible]	102	9	11.33	6.65	15043	615	24.46	-1.26	-1.76
[illegible]	48	16	2.50	4.59	13683	1149	11.91	-1.77	-2.08
[illegible]	132	10	13.20	10.92	10853	513	21.16	-0.92	-1.56
[illegible]	95	11	8.64	6.12	11807	515	22.93	-1.89	-2.15
[illegible]	230	18	12.78	9.16	10570	455	23.23	-1.74	-2.06
[illegible]	85	10	8.50	5.10	11876	532	22.32	-1.49	-1.91
[illegible]	209	16	13.06	8.50	10240	453	22.60	-1.4	-1.85
[illegible]	251	20	12.55	15.79	9620	548	17.55	-1.11	-1.67
[illegible]	145	16	9.06	8.02	9535	558	17.09	-1.29	-1.78



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

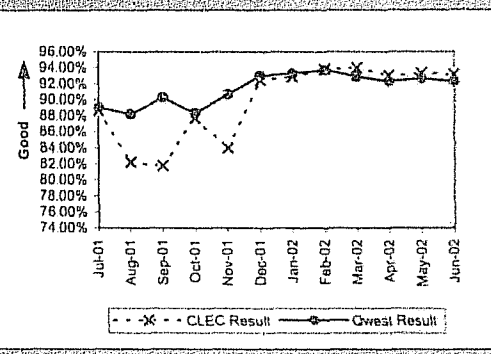
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
[illegible]	95	4	23.75	25.43	3457	94	36.78	-0.84	-1.51
[illegible]	84	6	14.00	11.95	5363	116	46.23	-1.41	-1.86
[illegible]	48	1	48.00		2089	80	26.11	1.59	-0.03
[illegible]	64	8	8.00	9.34	2297	84	27.35	-2.07	-2.26
[illegible]	46	6	8.00	13.84	2828	113	25.03	-1.54	-1.94
[illegible]	19	5	3.80	2.95	1244	56	22.21	-2.1	-2.28
[illegible]	39	5	7.80	5.40	2171	81	26.80	-1.68	-2.02
[illegible]	28	2	14.00	18.38	1393	52	26.79	-0.58	-1.36
[illegible]					1441	49	29.41		
[illegible]	5	1	5.00		1132	42	26.95	-0.82	-1.5
[illegible]	29	2	14.50	6.36	1003	47	21.34	-0.4	-1.24
[illegible]					921	51	18.06		



Checklist #4 - Unbundled Loop - DS1 Capable Installation

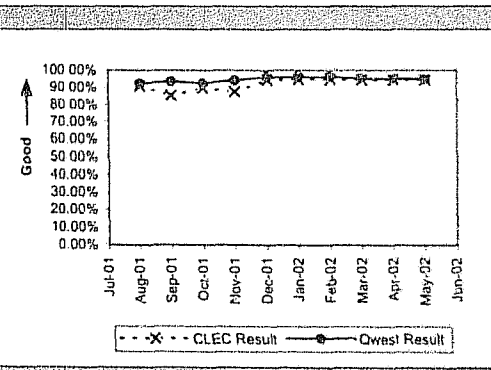
New Service Installation Quality (Percent) (OP-5) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	783	918	85.29%	31.68%	6156	6913	89.05%	0.23	-0.86
Aug-01	334	333	62.28%	38.18%	6298	7139	88.22%	3.09	0.88
Sep-01	348	303	81.85%	38.54%	6394	7080	90.31%	4.4	1.67
Oct-01	280	319	87.77%	32.76%	6484	7338	88.36%	0.34	-0.8
Nov-01	274	326	84.05%	36.62%	6937	7648	90.70%	3.71	1.26
Dec-01	321	347	92.51%	26.33%	6450	6933	93.03%	0.4	-0.76
Jan-02	464	435	92.87%	25.73%	6415	6877	93.28%	0.35	-0.79
Feb-02	472	501	93.81%	24.09%	6539	6975	93.75%	-0.06	-1.03
Mar-02	573	651	94.01%	23.73%	6036	6499	92.88%	-0.99	-1.6
Apr-02	365	552	93.02%	25.48%	6161	6697	92.30%	-0.64	-1.39
May-02	444	590	93.39%	24.94%	6923	7468	92.70%	-0.61	-1.37
Jun-02	589	633	93.10%	25.20%	6975	7556	92.31%	-0.79	-1.48



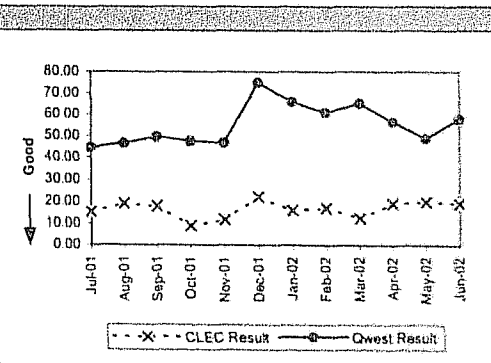
New Service Installation Quality (Percent) (OP-5*) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01									
Aug-01	353	353	90.99%	28.63%	6596	7139	92.39%	0.94	-0.43
Sep-01	258	303	85.46%	35.23%	6625	7080	93.57%	4.86	1.95
Oct-01	287	319	89.97%	30.04%	6768	7338	92.50%	1.63	-0.01
Nov-01	288	326	87.73%	32.81%	7210	7648	94.27%	4.34	1.64
Dec-01	329	347	94.52%	22.75%	6646	6933	95.86%	1.19	-0.28
Jan-02	417	435	94.71%	22.38%	6598	6877	95.94%	1.23	-0.25
Feb-02	474	501	94.61%	22.58%	6705	6975	96.13%	1.7	0.03
Mar-02	521	551	94.56%	22.69%	6164	6499	95.15%	0.63	-0.62
Apr-02	569	602	94.52%	22.76%	6363	6697	95.01%	0.53	-0.68
May-02	652	690	94.49%	22.81%	7000	7468	94.94%	0.51	-0.69
Jun-02									



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

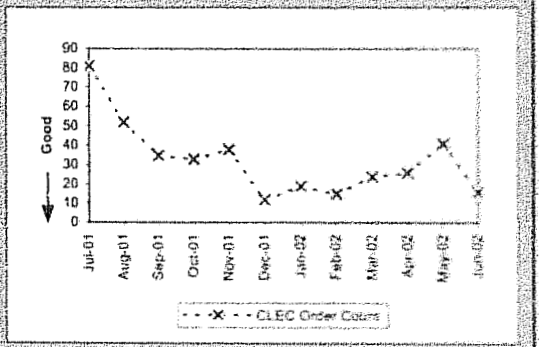
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	1009	89	15.38	24.64	70450	1578	44.65	-3.93	-3.39
Aug-01	1148	68	19.13	33.12	71793	1539	46.65	-2.83	-2.72
Sep-01	777	43	18.07	39.49	72169	1452	49.70	-2.61	-2.59
Oct-01	384	40	9.10	11.91	69384	1455	47.69	-3.06	-2.86
Nov-01	635	53	11.98	12.34	73319	1564	46.88	-3.09	-2.88
Dec-01	535	24	22.29	18.47	61142	815	75.02	-2.48	-2.51
Jan-02	652	36	18.18	18.34	69527	1053	66.03	-3.19	-2.94
Feb-02	705	41	17.20	16.25	69117	1132	61.06	-3.09	-2.88
Mar-02	491	39	12.59	17.41	67796	1039	65.25	-3.4	-3.06
Apr-02	907	47	19.30	21.55	71610	1265	56.61	-2.71	-2.65
May-02	1467	73	20.03	22.96	76923	1566	49.12	-2.92	-2.78
Jun-02	885	45	19.29	28.26	83701	1447	57.84	-2.94	-2.79



Checklist #4 - Unbundled Loop - DS1 Capable Installation

Count of Pending Orders Delayed for Facilities Reasons Unbundled Loop - DS1 Capable (OP-15B) (Diagnostic)

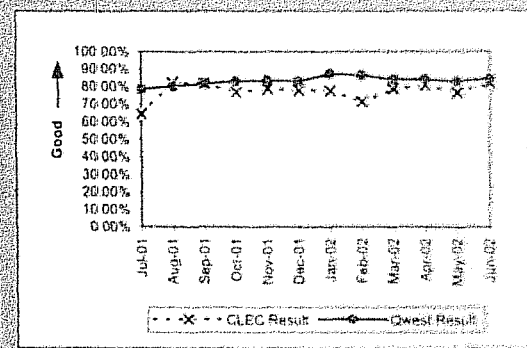
Date	CLEC Order Count
Jul-01	81
Aug-01	52
Sep-01	35
Oct-01	33
Nov-01	38
Dec-01	12
Jan-02	19
Feb-02	15
Mar-02	24
Apr-02	26
May-02	41
Jun-02	16



Checklist #4 - Unbundled Loop - DS1 Capable Repair

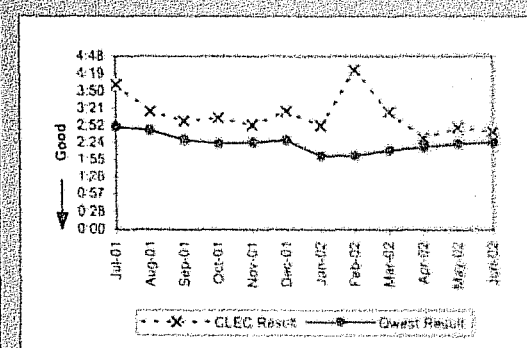
All Troubles Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	71	110	64.55%	47.84%	3988	5078	78.53%	3.33	1.02
Aug-01	141	171	82.46%	38.03%	4190	5223	80.22%	-0.72	-1.44
Sep-01	104	127	81.89%	38.51%	3571	4369	81.74%	-0.04	-1.03
Oct-01	103	134	76.87%	42.17%	4061	4880	83.22%	1.87	0.14
Nov-01	129	164	78.66%	40.97%	3500	4189	83.55%	1.61	-0.02
Dec-01	99	127	77.95%	41.46%	2962	3561	83.18%	1.51	-0.08
Jan-02	94	121	77.69%	41.64%	3341	3826	87.32%	2.89	0.76
Feb-02	80	112	71.43%	45.18%	2971	3437	86.44%	4.07	1.48
Mar-02	119	151	78.81%	40.87%	3055	3631	84.14%	1.7	0.03
Apr-02	146	181	80.66%	39.49%	3274	3895	84.06%	1.2	-0.27
May-02	159	208	76.44%	42.44%	3226	3893	82.87%	2.3	0.4
Jun-02	211	258	81.78%	38.60%	3508	4166	84.21%	1.03	-0.37



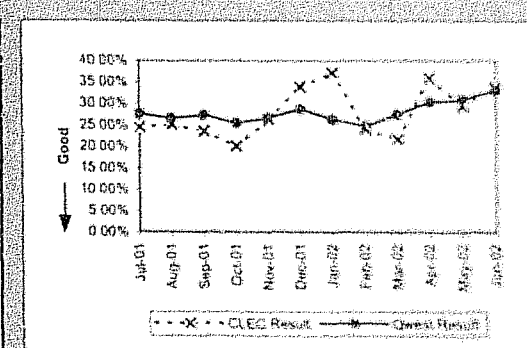
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	444:02	110	4:02	5:38	14491:35	5078	2:51	2.41	0.47
Aug-01	568:34	171	3:17	7:42	14353:10	5223	2:45	0.73	-0.56
Sep-01	383:26	127	3:01	5:14	10835:06	4369	2:29	1.6	-0.03
Oct-01	416:09	134	3:06	4:20	11617:03	4880	2:23	2.32	0.41
Nov-01	474:46	164	2:54	3:28	10127:22	4189	2:25	1.67	0.01
Dec-01	416:43	127	3:17	4:32	8779:36	3561	2:28	2.22	0.35
Jan-02	349:26	121	2:53	3:25	7765:14	3826	2:02	3	0.82
Feb-02	494:49	112	4:25	7:13	6974:59	3437	2:02	8.07	3.91
Mar-02	492:53	151	3:16	7:08	7961:26	3631	2:12	4.3	1.61
Apr-02	458:14	181	2:32	2:20	8893:50	3895	2:17	0.93	-0.43
May-02	568:01	208	2:50	2:47	9295:13	3893	2:23	1.47	-0.1
Jun-02	699:47	258	2:43	2:59	10056:02	4166	2:25	1.46	-0.11



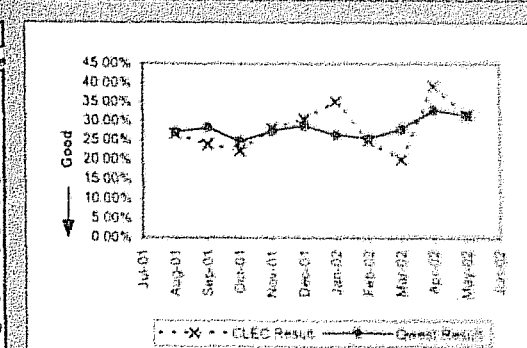
Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	27	110	24.55%	43.04%	1397	5078	27.51%	-0.69	-1.42
Aug-01	43	171	25.15%	43.39%	1386	5223	26.54%	-0.41	-1.25
Sep-01	30	127	23.62%	42.48%	1192	4369	27.28%	-0.91	-1.56
Oct-01	27	134	20.15%	40.11%	1243	4880	25.47%	-1.39	-1.85
Nov-01	43	164	26.22%	43.98%	1118	4189	26.69%	-0.13	-1.08
Dec-01	43	127	33.86%	47.32%	1021	3561	28.67%	1.26	-0.24
Jan-02	45	121	37.19%	48.33%	1006	3826	26.29%	2.59	0.57
Feb-02	27	112	24.11%	42.77%	851	3437	24.76%	-0.16	-1.1
Mar-02	33	151	21.85%	41.33%	996	3631	27.43%	-1.5	-1.91
Apr-02	65	181	35.91%	47.97%	1179	3895	30.27%	1.59	-0.03
May-02	61	208	29.33%	45.53%	1201	3893	30.85%	-0.46	-1.28
Jun-02	87	258	33.72%	47.28%	1371	4166	32.91%	0.27	-0.83



Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

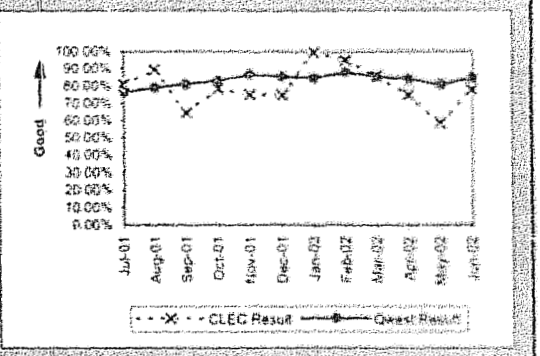
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01									
Aug-01	30	112	26.79%	44.28%	935	3435	27.22%	-0.1	-1.06
Sep-01	24	100	24.00%	42.71%	813	2865	28.38%	-0.95	-1.58
Oct-01	23	103	22.33%	41.65%	787	3182	24.73%	-0.56	-1.34
Nov-01	37	131	28.24%	45.02%	739	2684	27.53%	0.19	-0.89
Dec-01	30	98	30.61%	46.09%	651	2256	28.86%	0.38	-0.77
Jan-02	35	99	35.35%	47.81%	644	2433	26.47%	1.91	0.16
Feb-02	23	92	25.00%	43.30%	552	2164	25.51%	-0.11	-1.07
Mar-02	24	119	20.17%	40.13%	675	2401	28.11%	-1.88	-2.14
Apr-02	54	137	39.42%	48.87%	876	2649	33.07%	1.52	-0.07
May-02	55	167	31.74%	46.55%	865	2730	31.69%	0.02	-0.99
Jun-02									



Checklist #4 - Unbundled Loop - DS1 Capable Repair

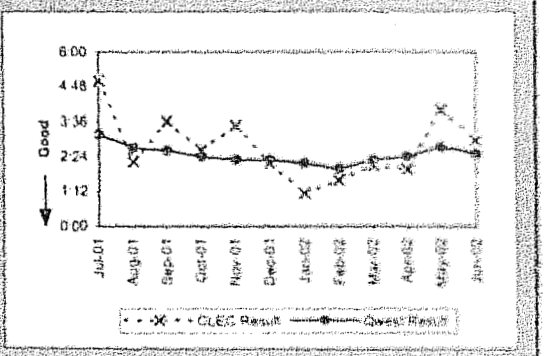
All Troubles Cleared within 4 hours (Percent) (MR-5B) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	13	16	81.25%	39.03%	2147	2800	76.68%	-0.43	-1.26
Aug-01	17	19	89.47%	30.69%	2288	2899	78.92%	-1.12	-1.68
Sep-01	11	17	64.71%	47.79%	1684	2078	81.04%	1.59	-0.03
Oct-01	11	14	78.57%	41.03%	1864	2240	83.21%	0.49	-0.7
Nov-01	15	20	75.00%	43.30%	1726	1993	86.60%	1.41	-0.14
Dec-01	6	8	75.00%	43.30%	1468	1719	85.40%	0.79	-0.52
Jan-02	15	15	100.00%	0.00%	1461	1723	84.79%	-1.63	-1.99
Feb-02	20	21	95.24%	21.30%	1470	1668	88.13%	-1	-1.61
Mar-02	12	14	85.71%	34.99%	1609	1888	85.22%	-0.05	-1.03
Apr-02	24	32	75.00%	43.30%	1784	2123	84.03%	1.33	-0.19
May-02	17	29	58.62%	49.25%	1765	2182	80.89%	2.74	0.67
Jun-02	28	36	77.78%	41.57%	2040	2419	84.33%	1.05	-0.36



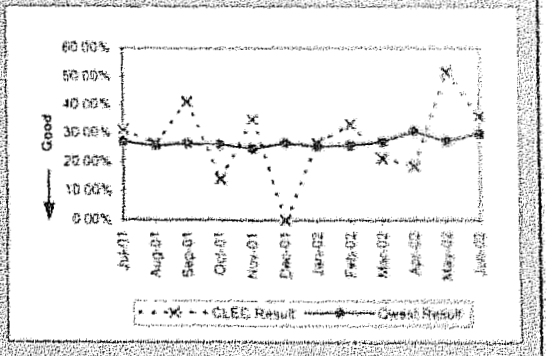
Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	80:06	16	5:00	9:49	8924:17	2800	3:11	2.23	0.35
Aug-01	42:31	19	2:14	2:24	7872:43	2899	2:43	-0.53	-1.32
Sep-01	61:31	17	3:37	3:04	5430:33	2078	2:37	1.94	0.18
Oct-01	36:54	14	2:38	1:35	5384:11	2240	2:24	1.98	0.2
Nov-01	69:14	20	3:28	3:43	4584:21	1993	2:18	2	0.21
Dec-01	17:17	8	2:10	2:28	3914:24	1719	2:17	-0.09	-1.05
Jan-02	17:11	15	1:09	0:59	3726:58	1723	2:10	-1.23	-1.75
Feb-02	33:37	21	1:36	1:18	3313:54	1668	1:59	-0.59	-1.36
Mar-02	29:29	14	2:06	1:49	4315:22	1888	2:17	-0.22	-1.13
Apr-02	63:33	32	1:59	2:16	5083:52	2123	2:24	-0.64	-1.39
May-02	116:38	29	4:01	3:53	5995:30	2182	2:45	1.61	-0.02
Jun-02	107:33	36	2:59	4:22	6061:27	2419	2:30	0.99	-0.4



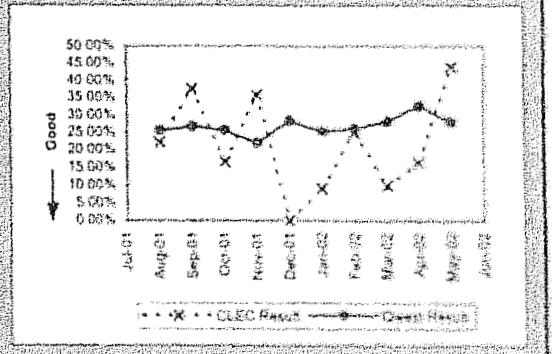
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	5	16	31.25%	46.35%	753	2800	26.89%	0.41	-0.75
Aug-01	5	19	26.32%	44.03%	744	2899	25.66%	0.1	-0.94
Sep-01	7	17	41.18%	49.22%	550	2078	26.47%	1.31	-0.2
Oct-01	2	14	14.29%	34.99%	587	2240	26.21%	-1.01	-1.61
Nov-01	7	20	35.00%	47.70%	493	1993	24.74%	1.03	-0.37
Dec-01	0	8	0.00%	0.00%	458	1719	26.64%	-1.7	-2.03
Jan-02	4	15	26.67%	44.22%	440	1723	25.54%	0.13	-0.92
Feb-02	7	21	33.33%	47.14%	432	1668	25.90%	0.77	-0.53
Mar-02	3	14	21.43%	41.03%	513	1888	27.17%	-0.48	-1.29
Apr-02	6	32	18.75%	39.03%	656	2123	30.90%	-1.48	-1.9
May-02	15	29	51.72%	49.97%	595	2182	27.27%	2.76	0.68
Jun-02	13	36	36.11%	48.03%	725	2419	29.97%	0.8	-0.51



Repair Repeat Report Rate (Percent) (MR-7E*) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01									
Aug-01	2	9	22.22%	41.57%	481	1882	25.56%	-0.23	-1.14
Sep-01	6	16	37.50%	48.41%	353	1323	26.68%	0.95	-0.42
Oct-01	2	12	16.67%	37.27%	349	1369	25.49%	-0.7	-1.42
Nov-01	5	14	35.71%	47.92%	262	1191	22.00%	1.17	-0.29
Dec-01	0	4	0.00%	0.00%	297	1049	28.31%	-1.25	-1.76
Jan-02	1	11	9.09%	28.75%	262	1033	25.36%	-1.23	-1.75
Feb-02	3	12	25.00%	43.30%	269	1032	26.07%	-0.68	-1.05
Mar-02	1	10	10.00%	30.00%	344	1222	28.15%	-1.27	-1.77
Apr-02	3	18	16.67%	37.27%	467	1431	32.63%	-1.44	-1.87
May-02	11	25	44.00%	49.64%	431	1533	28.11%	1.68	0.02
Jun-02									



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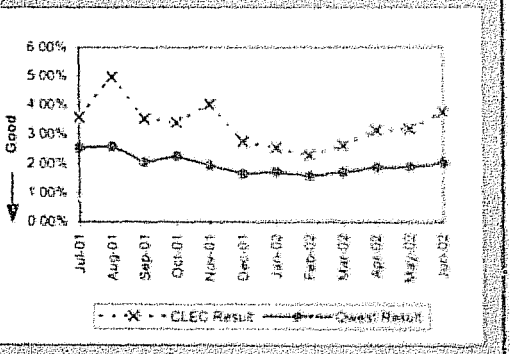
Checklist #4 - Unbundled Loop - DS1 Capable Repair

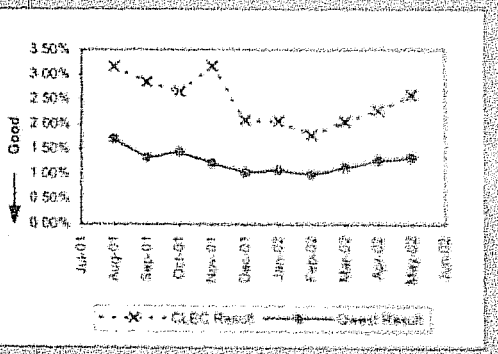
Trouble Rate (Percent) (MR-8) (Parity)– Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	126	3513	3.59%	18.60%	7878	310507	2.54%	3.93	1.39
Aug-01	190	3822	4.97%	21.74%	8122	312764	2.60%	9.17	4.58
Sep-01	144	4074	3.53%	18.47%	6447	314738	2.05%	6.65	3.05
Oct-01	148	4344	3.41%	18.14%	7120	315764	2.25%	5.08	2.09
Nov-01	184	4570	4.03%	19.66%	6182	318019	1.94%	10.12	5.15
Dec-01	135	4891	2.76%	16.38%	5280	320210	1.65%	6.06	2.68
Jan-02	136	5337	2.55%	15.76%	5549	322799	1.72%	4.62	1.81
Feb-02	133	5814	2.29%	14.95%	5105	322988	1.58%	4.28	1.6
Mar-02	165	6275	2.63%	16.00%	5519	322151	1.71%	5.54	2.37
Apr-02	213	6797	3.13%	17.42%	6018	321850	1.87%	7.61	3.65
May-02	237	7440	3.19%	17.56%	6075	322674	1.88%	8.17	3.97
Jun-02	294	7853	3.74%	18.98%	6585	325120	2.03%	10.68	5.49



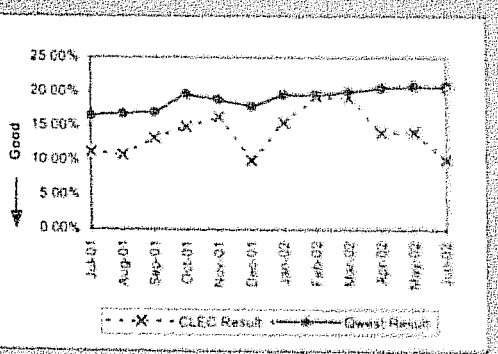
Trouble Rate (Percent) (MR-8*) (Parity)– Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01									
Aug-01	121	3822	3.17%	17.51%	5317	312764	1.70%	6.97	3.24
Sep-01	116	4074	2.85%	16.63%	4188	314738	1.33%	8.39	4.1
Oct-01	115	4344	2.65%	16.05%	4551	315764	1.44%	6.62	3.03
Nov-01	145	4570	3.17%	17.53%	3875	318019	1.22%	11.96	6.27
Dec-01	102	4891	2.09%	14.29%	3305	320210	1.03%	7.23	3.4
Jan-02	110	5337	2.06%	14.21%	3466	322799	1.07%	6.94	3.22
Feb-02	104	5814	1.79%	13.25%	3196	322988	0.99%	6.1	2.71
Mar-02	129	6275	2.06%	14.19%	3623	322151	1.12%	6.93	3.21
Apr-02	155	6797	2.28%	14.93%	4080	321850	1.27%	7.39	3.49
May-02	192	7440	2.58%	15.86%	4263	322674	1.32%	9.41	4.72
Jun-02									



Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)– Interval Zone One and Two

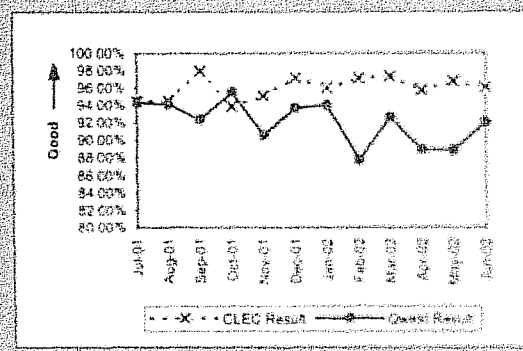
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	16	142	11.27%	31.62%	1560	9438	16.53%	-1.68	-2.02
Aug-01	23	213	10.80%	31.04%	1635	9757	16.76%	-2.3	-2.4
Sep-01	22	166	13.25%	33.91%	1321	7768	17.01%	-1.27	-1.77
Oct-01	26	174	14.94%	35.65%	1740	8860	19.64%	-1.54	-1.94
Nov-01	36	220	16.36%	36.99%	1436	7618	18.85%	-0.93	-1.57
Dec-01	15	150	10.00%	30.00%	1149	6429	17.87%	-2.49	-2.51
Jan-02	25	161	15.53%	36.22%	1351	6900	19.58%	-1.28	-1.78
Feb-02	32	165	19.39%	39.54%	1244	6349	19.59%	-0.06	-1.04
Mar-02	39	204	19.12%	39.32%	1378	6897	19.98%	-0.3	-1.18
Apr-02	35	248	14.11%	34.82%	1559	7577	20.58%	-2.48	-2.51
May-02	39	276	14.13%	34.83%	1597	7672	20.82%	-2.69	-2.63
Jun-02	33	327	10.09%	30.12%	1727	8312	20.76%	-4.67	-3.84



Checklist #4 - Unbundled Loop - ISDN Capable Installation

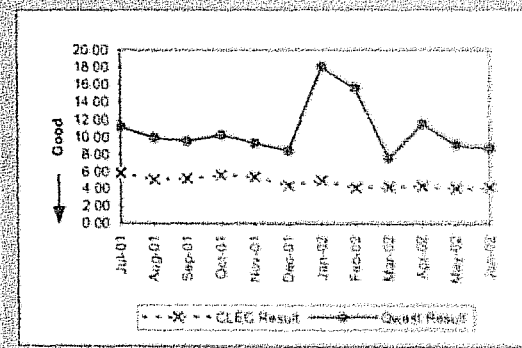
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	532	563	94 49%	22 81%	1944	2060	94 37%	-0 11	-1 07
Aug-01	750	793	94 58%	22 65%	1969	2092	94 12%	-0 47	-1 28
Sep-01	491	501	98 00%	13 99%	1529	1655	92 39%	-4 15	-3 53
Oct-01	200	213	93 90%	23 94%	2144	2244	95 54%	1 08	-0 34
Nov-01	98	103	95 15%	21 49%	1542	1701	90 65%	-1 52	-1 92
Dec-01	384	395	97 22%	16 45%	1342	1433	93 65%	-2 57	-2 56
Jan-02	292	304	96 05%	19 47%	3691	3925	94 04%	-1 43	-1 87
Feb-02	574	591	97 12%	16 71%	1853	2111	87 78%	-6 13	-4 73
Mar-02	409	420	97 38%	15 97%	1572	1697	92 63%	-3 33	-3 03
Apr-02	426	445	95 73%	20 22%	1675	1884	88 91%	-4 12	-3 51
May-02	426	440	96 82%	17 55%	1430	1609	88 88%	-4 7	-3 85
Jun-02	394	407	96 07%	19 43%	1453	1579	92 02%	-2 69	-2 63



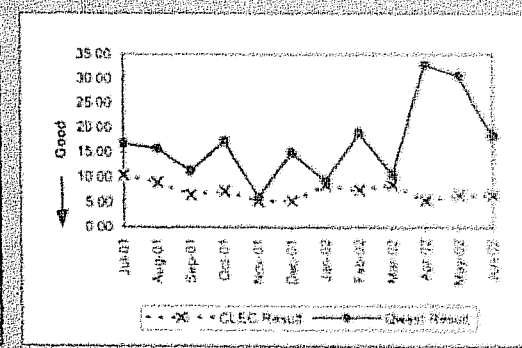
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	2763	469	5 89	7 19	23635	2110	11 20	-8 12	-5 94
Aug-01	3300	641	5 15	3 16	22259	2224	10 01	-9 7	-6 9
Sep-01	2423	465	5 21	3 23	16530	1727	9 57	-7 53	-5 58
Oct-01	1296	228	5 68	4 13	23523	2282	10 31	-4 13	-3 51
Nov-01	476	88	5 41	3 95	15753	1684	9 35	-2 97	-2 81
Dec-01	1625	368	4 42	2 19	12488	1462	8 54	-6 89	-5 19
Jan-02	1431	287	4 99	3 21	70910	3933	18 03	-13 9	-9 45
Feb-02	1997	480	4 16	2 69	35185	2265	15 53	-13 86	-9 43
Mar-02	1500	351	4 27	1 77	12418	1624	7 65	-7 27	-5 42
Apr-02	1766	412	4 29	2 09	20678	1792	11 54	-6 52	-4 95
May-02	1667	410	4 07	2 06	14144	1546	9 18	-6 28	-4 82
Jun-02	1547	392	4 20	2 19	13622	1562	8 72	-7 25	-5 41



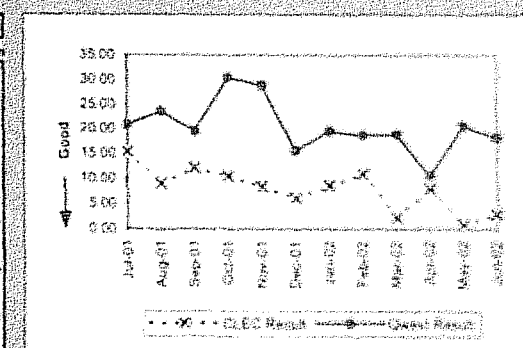
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	302	29	10 41	13 57	2325	139	16 73	-1 14	-1 69
Aug-01	209	23	9 09	8 23	3545	224	15 83	-1 06	-1 64
Sep-01	419	64	6 55	5 90	2242	198	11 32	-1 77	-2 08
Oct-01	511	69	7 41	5 71	2134	123	17 35	-2 21	-2 34
Nov-01	171	32	5 34	4 94	1109	183	6 06	-0 32	-1 18
Dec-01	95	18	5 44	3 71	1953	130	15 02	-0 93	-1 55
Jan-02	255	30	8 50	6 03	3690	395	9 34	-0 25	-1 15
Feb-02	234	31	7 55	6 03	5087	269	18 91	-3 2	-2 94
Mar-02	130	15	8 67	9 54	1399	130	10 75	-0 61	-1 37
Apr-02	114	21	5 43	4 66	7070	215	32 88	-3 73	-3 27
May-02	100	15	6 67	5 75	4964	162	30 64	-2 77	-2 69
Jun-02	124	19	6 53	5 45	2449	133	18 41	-2 22	-2 35



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

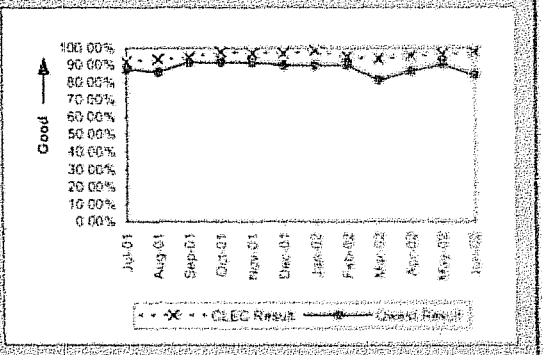
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	385	25	15 40	20 65	1456	70	20 80	-0 96	-1 59
Aug-01	332	37	8 97	7 08	1913	81	23 62	-2 97	-2 81
Sep-01	255	21	12 14	10 51	1037	53	19 57	-1 24	-1 76
Oct-01	241	23	10 48	8 20	1925	63	30 56	-1 22	-1 74
Nov-01	220	26	8 46	8 21	2249	78	28 83	-3 06	-2 86
Dec-01	81	13	6 23	6 66	582	37	15 73	-1 67	-2 01
Jan-02	95	11	8 64	5 33	860	44	19 55	-1 25	-1 76
Feb-02	11	1	11 00		468	25	18 72	-0 73	-1 44
Mar-02	7	3	2 33	2 31	114	6	19 00	-0 97	-1 55
Apr-02	8	1	8 00		106	10	10 60	-0 25	-1 15
May-02	2	2	1 00	0 00	516	25	20 64	-0 55	-1 33
Jun-02	3	1	3 00		147	8	18 38	-0 77	-1 47



Checklist #4 - Unbundled Loop - ISDN Capable Installation

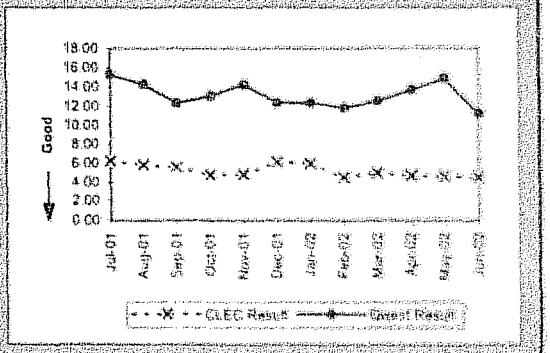
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	106	115	92.17%	26.86%	388	442	87.78%	-1.28	-1.78
Aug-01	117	125	93.60%	24.48%	397	461	86.12%	-2.15	-2.3
Sep-01	53	56	94.64%	22.52%	481	525	91.62%	-0.78	-1.47
Oct-01	51	52	98.08%	13.73%	450	490	91.84%	-1.56	-1.95
Nov-01	37	38	97.37%	16.01%	409	446	91.70%	-1.22	-1.74
Dec-01	63	65	96.92%	17.27%	297	330	90.00%	-1.7	-2.03
Jan-02	76	77	98.70%	11.32%	315	351	89.74%	-2.35	-2.43
Feb-02	61	64	95.31%	21.14%	472	523	90.25%	-1.29	-1.78
Mar-02	92	98	93.88%	23.97%	344	424	81.13%	-2.91	-2.77
Apr-02	107	112	95.54%	20.65%	342	395	86.58%	-2.45	-2.49
May-02	81	84	96.43%	18.56%	418	461	90.67%	-1.67	-2.01
Jun-02	78	80	97.50%	15.61%	294	349	84.24%	-2.94	-2.78



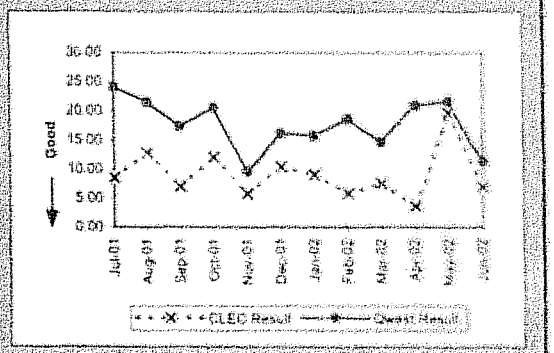
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	478	76	6.29	5.17	7057	462	15.30	-3.13	-2.9
Aug-01	511	87	5.87	6.23	6828	477	14.31	-5.06	-4.08
Sep-01	264	47	5.62	3.93	6668	540	12.35	-3.61	-3.19
Oct-01	206	43	4.79	1.71	6784	518	13.10	-3.35	-3.04
Nov-01	136	28	4.86	2.26	7417	529	14.26	-3.66	-3.23
Dec-01	394	64	6.16	4.96	4108	332	12.37	-2.94	-2.79
Jan-02	433	72	6.01	4.52	4443	359	12.38	-3.79	-3.3
Feb-02	219	48	4.56	1.83	6130	517	11.86	-3.96	-3.41
Mar-02	426	85	5.01	1.88	5377	428	12.56	-5.15	-4.13
Apr-02	483	102	4.74	2.01	5397	393	13.73	-4.16	-3.53
May-02	356	77	4.62	3.04	7013	470	14.92	-6.41	-4.9
Jun-02	349	77	4.53	1.53	3896	347	11.23	-5.31	-4.23



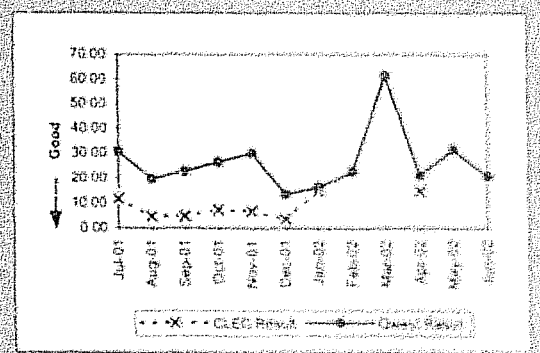
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	60	7	8.57	3.74	1516	63	24.10	-1.05	-1.64
Aug-01	103	8	12.88	11.48	1310	61	21.48	-0.91	-1.55
Sep-01	120	17	7.06	4.60	678	39	17.38	-1.41	-1.85
Oct-01	255	21	12.14	15.49	1070	52	20.58	-1.37	-1.84
Nov-01	59	10	5.90	5.72	1071	111	9.65	-0.76	-1.46
Dec-01	105	10	10.50	7.98	601	37	16.24	-0.74	-1.45
Jan-02	110	12	9.17	6.90	633	40	15.82	-1.26	-1.76
Feb-02	53	9	5.89	3.37	989	53	18.66	-1.64	-2
Mar-02	76	10	7.60	2.63	1254	85	14.75	-1.38	-1.84
Apr-02	22	6	3.67	4.27	1072	51	21.02	-0.89	-1.54
May-02	158	8	19.75	27.93	910	42	21.67	-0.22	-1.14
Jun-02	14	2	7.00	1.41	667	59	11.31	-0.48	-1.29



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

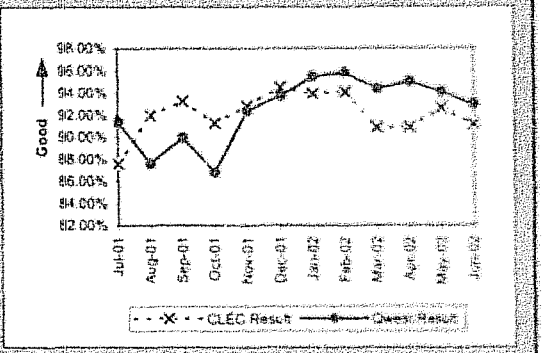
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	71	6	11.83	10.74	1172	38	30.84	-0.95	-1.58
Aug-01	24	5	4.80	4.44	1095	55	19.91	-1.64	-2
Sep-01	29	6	4.83	7.05	657	29	22.66	-1.82	-2.11
Oct-01	45	6	7.50	8.02	877	33	26.58	-1.67	-2.01
Nov-01	49	7	7.00	7.64	810	27	30.00	-2	-2.22
Dec-01	11	3	3.67	2.31	230	17	13.53	-1.5	-1.91
Jan-02	15	1	15.00		360	22	16.36	-0.09	-1.06
Feb-02					91	4	22.75		
Mar-02					493	8	61.62		
Apr-02	45	3	15.00	12.49	149	7	21.29	-0.73	-1.44
May-02					191	6	31.83		
Jun-02					63	3	21.00		



Checklist #4 - Unbundled Loop - ISDN Capable Installation

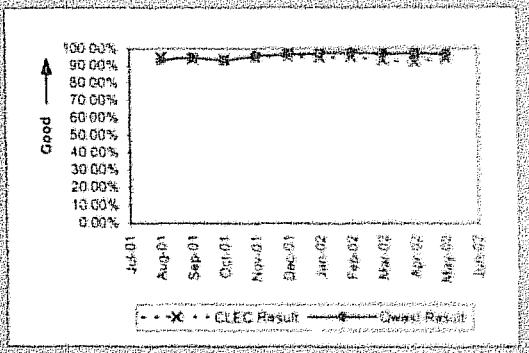
New Service Installation Quality (Percent) (OP-5) (Parity)– Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	657	750	87.60%	32.96%	2729	2986	91.39%	3.31	1.01
Aug-01	770	837	92.00%	27.14%	2460	2808	87.61%	-3.38	-3.06
Sep-01	872	935	93.26%	25.07%	2378	2645	89.91%	-2.93	-2.78
Oct-01	805	882	91.27%	28.23%	2318	2671	86.78%	-3.41	-3.07
Nov-01	664	715	92.87%	25.74%	2448	2649	92.41%	-0.41	-1.25
Dec-01	519	549	94.54%	22.73%	2005	2138	93.78%	-0.65	-1.4
Jan-02	452	481	93.97%	23.80%	3182	3333	95.47%	1.42	-0.14
Feb-02	544	576	94.12%	23.53%	3700	3862	95.81%	1.89	0.15
Mar-02	575	633	90.84%	28.85%	2447	2593	94.37%	3.46	1.1
Apr-02	529	582	90.89%	28.77%	2162	2275	95.03%	4.1	1.49
May-02	553	597	92.63%	26.13%	2101	2233	94.09%	1.34	-0.18
Jun-02	513	563	91.12%	28.45%	1906	2051	92.93%	1.49	-0.1



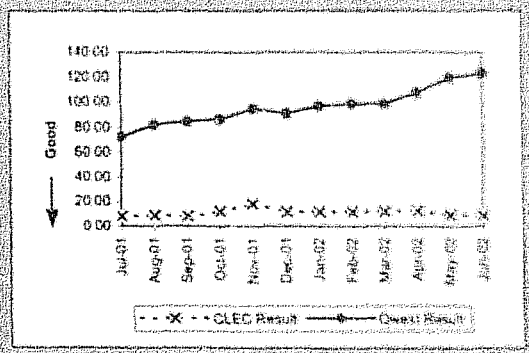
New Service Installation Quality (Percent) (OP-5*) (Parity)– Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01									
Aug-01	795	837	94.98%	21.83%	2617	2808	93.20%	-1.8	-2.09
Sep-01	881	935	94.22%	23.33%	2505	2645	94.71%	0.57	-0.66
Oct-01	827	882	93.76%	24.18%	2488	2671	93.15%	-0.63	-1.38
Nov-01	680	715	95.10%	21.58%	2535	2649	95.70%	0.69	-0.58
Dec-01	526	549	95.81%	20.03%	2065	2138	96.59%	0.89	-0.46
Jan-02	456	481	94.80%	22.20%	3243	3333	97.30%	2.77	0.69
Feb-02	551	576	95.33%	21.10%	3779	3862	97.85%	3.5	1.37
Mar-02	592	633	93.52%	24.61%	2512	2593	96.88%	4.35	1.64
Apr-02	537	582	92.27%	26.71%	2220	2275	97.58%	7.45	3.53
May-02	564	597	94.47%	22.85%	2157	2233	96.60%	2.54	0.55
Jun-02									



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

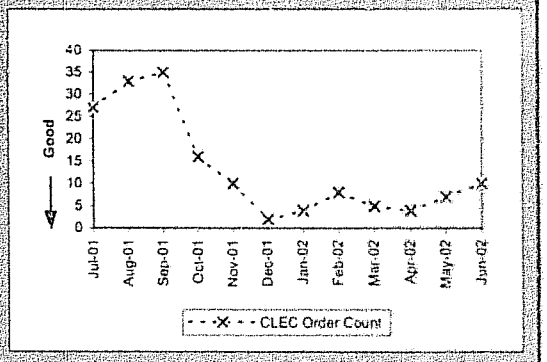
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	281	34	8.26	9.12	38654	534	72.39	-3.53	-3.15
Aug-01	411	46	8.93	11.60	42906	522	82.20	-4.32	-3.63
Sep-01	552	66	8.36	12.08	41208	485	84.96	-5.16	-4.14
Oct-01	391	32	12.22	19.60	42500	490	86.73	-3.41	-3.07
Nov-01	513	28	18.32	25.02	46509	491	94.72	-3.09	-2.86
Dec-01	249	21	11.86	14.22	49209	540	91.13	-2.86	-2.74
Jan-02	238	20	11.90	6.61	52546	541	97.13	-3.08	-2.87
Feb-02	307	26	11.81	12.37	58613	594	98.68	-3.72	-3.26
Mar-02	316	26	12.15	15.15	62414	631	98.91	-4.02	-3.44
Apr-02	218	17	12.82	17.76	59917	556	107.76	-3.18	-2.93
May-02	212	23	9.22	9.29	65188	545	119.61	-4.17	-3.53
Jun-02	205	23	8.91	8.46	66375	556	122.98	-4.17	-3.53



Checklist #4 - Unbundled Loop - ISDN Capable Installation

Percent of Pending Orders Delayed for Facilities Reasons Unbundled Loop ISDN Capable (OP-15B) (Diagnostic)

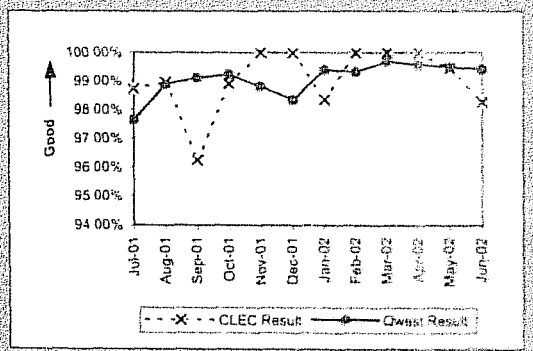
Date	CLEC Order Count
Jul-01	27
Aug-01	33
Sep-01	35
Oct-01	16
Nov-01	10
Dec-01	2
Jan-02	4
Feb-02	8
Mar-02	5
Apr-02	4
May-02	7
Jun-02	10



Checklist #4 - Unbundled Loop - ISDN Capable Repair

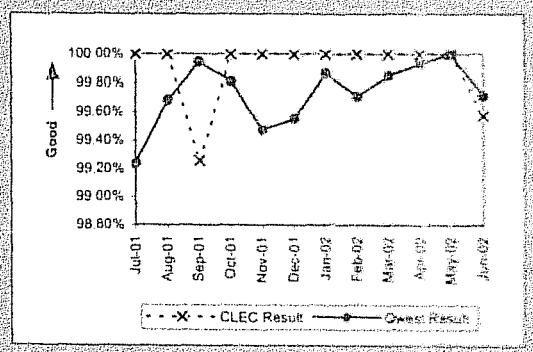
Out of Service Cleared within 24 hours (Percent) (MR-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	234	237	98.73%	11.18%	2160	2212	97.65%	-1.05	-1.64
Aug-01	194	196	98.98%	10.05%	2496	2524	98.89%	-0.11	-1.07
Sep-01	129	134	96.27%	18.95%	1819	1835	99.13%	2.5	0.52
Oct-01	182	184	98.91%	10.37%	2106	2122	99.25%	0.52	-0.68
Nov-01	167	167	100.00%	0.00%	1678	1698	98.82%	-1.35	-1.82
Dec-01	121	121	100.00%	0.00%	1316	1338	98.36%	-1.36	-1.83
Jan-02	120	122	98.36%	12.70%	1517	1526	99.41%	1.21	-0.26
Feb-02	106	106	100.00%	0.00%	1347	1356	99.34%	-0.81	-1.49
Mar-02	145	145	100.00%	0.00%	1356	1360	99.71%	-0.62	-1.36
Apr-02	109	109	100.00%	0.00%	1433	1439	99.58%	-0.8	-1.48
May-02	182	183	99.45%	7.37%	1404	1411	99.50%	0.13	-0.92
Jun-02	228	232	98.28%	13.02%	1389	1397	99.43%	1.68	0.02



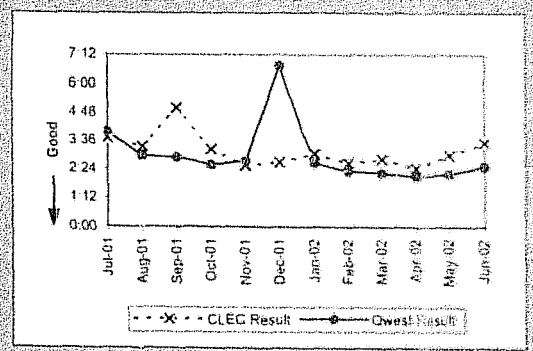
All Troubles Cleared within 48 hours (Percent) (MR-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	241	241	100.00%	0.00%	2208	2225	99.24%	-1.29	-1.79
Aug-01	200	200	100.00%	0.00%	2525	2533	99.68%	-0.77	-1.47
Sep-01	134	135	99.26%	8.57%	1848	1849	99.95%	1.54	-0.06
Oct-01	188	188	100.00%	0.00%	2135	2139	99.81%	-0.57	-1.35
Nov-01	177	177	100.00%	0.00%	1703	1712	99.47%	-0.92	-1.56
Dec-01	123	123	100.00%	0.00%	1344	1350	99.56%	-0.71	-1.43
Jan-02	123	123	100.00%	0.00%	1544	1546	99.87%	-0.38	-1.23
Feb-02	114	114	100.00%	0.00%	1364	1368	99.71%	-0.56	-1.34
Mar-02	147	147	100.00%	0.00%	1370	1372	99.85%	-0.44	-1.27
Apr-02	177	177	100.00%	0.00%	1456	1457	99.93%	-0.33	-1.2
May-02	190	190	100.00%	0.00%	1424	1424	100.00%	N/A	N/A
Jun-02	235	236	99.58%	6.50%	1402	1406	99.72%	0.35	-0.79



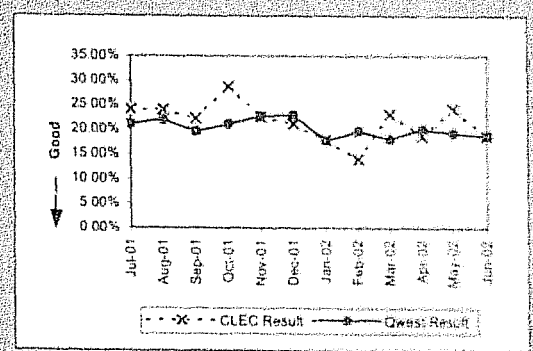
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	592:05	241	3:42	5:09	8815:20	2225	3:58	-0.24	-1.15
Aug-01	669:05	200	3:21	4:38	7459:51	2533	2:57	0.66	-0.6
Sep-01	676:01	135	5:00	11:31	5331:35	1849	2:53	4.86	1.95
Oct-01	608:22	188	3:14	4:19	5534:52	2139	2:35	1.53	-0.07
Nov-01	452:45	177	2:33	2:26	4650:52	1712	2:43	-0.3	-1.18
Dec-01	332:53	123	2:42	2:49	9122:46	1350	6:45	-0.4	-1.24
Jan-02	372:24	123	3:02	3:53	4100:56	1546	2:39	0.3	-0.82
Feb-02	302:40	114	2:39	2:57	3175:42	1368	2:19	0.52	-0.68
Mar-02	414:30	147	2:49	2:42	3054:34	1372	2:14	1.39	-0.15
Apr-02	434:08	177	2:27	2:31	3037:42	1457	2:05	1.32	-0.2
May-02	567:20	190	2:59	3:27	3122:43	1424	2:12	2.82	0.71
Jun-02	630:47	236	3:31	6:50	3505:22	1406	2:30	2.78	0.69



Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

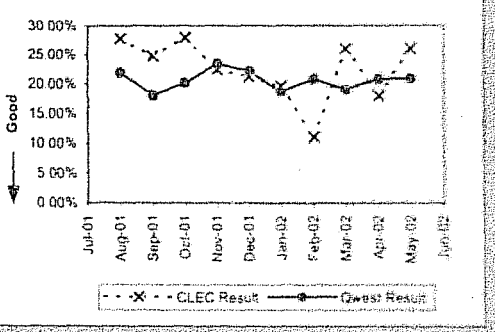
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	58	241	24.07%	42.75%	471	2226	21.16%	1.04	-0.37
Aug-01	48	200	24.00%	42.71%	558	2537	21.99%	0.66	-0.6
Sep-01	30	135	22.22%	41.57%	382	1852	19.55%	0.76	-0.54
Oct-01	54	188	28.72%	45.25%	451	2140	21.07%	2.37	0.44
Nov-01	40	177	22.60%	41.82%	389	1714	22.70%	-0.03	-1.02
Dec-01	26	123	21.14%	40.83%	310	1350	22.96%	-0.46	-1.28
Jan-02	22	123	17.89%	38.32%	274	1546	17.72%	0.06	-0.96
Feb-02	16	114	14.04%	34.74%	268	1368	19.59%	-1.44	-1.87
Mar-02	34	147	23.13%	42.17%	249	1373	18.14%	1.45	-0.12
Apr-02	33	177	18.64%	38.95%	292	1458	20.03%	-0.43	-1.26
May-02	46	190	24.21%	42.84%	275	1424	19.31%	1.57	-0.05
Jun-02	44	236	18.64%	38.95%	263	1406	18.71%	-0.02	-1.01



Checklist #4 - Unbundled Loop - ISDN Capable Repair

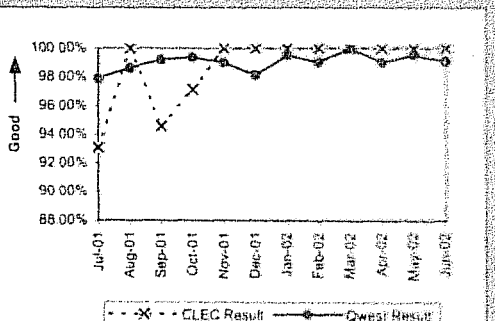
Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
[illegible]									
Aug-01	43	155	27.74%	44.77%	270	1231	21.93%	1.6	-0.02
[illegible]	25	113	24.78%	43.17%	166	919	18.06%	1.68	0.02
[illegible]	42	150	28.00%	44.90%	220	1090	20.18%	2.14	0.3
[illegible]	33	138	22.46%	41.73%	212	904	23.45%	-0.26	-1.16
[illegible]	21	99	21.21%	40.88%	153	690	22.17%	-0.22	-1.13
[illegible]	31	167	19.63%	39.72%	154	824	18.69%	0.25	-0.85
[illegible]	10	90	11.11%	31.43%	147	707	20.79%	-2.13	-2.3
[illegible]	30	115	26.09%	43.91%	131	686	19.10%	1.69	0.03
[illegible]	26	144	18.06%	38.47%	157	755	20.79%	-0.74	-1.45
May-02	42	161	26.09%	43.91%	161	770	20.91%	1.43	-0.13
[illegible]									



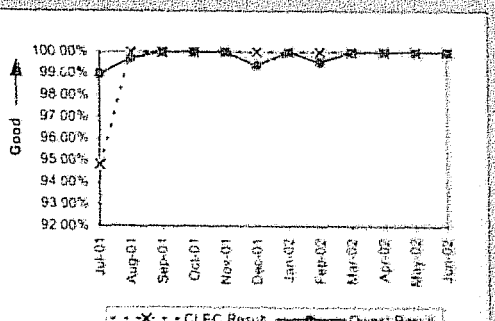
Out of Service Cleared within 24 hours (Percent) (MR-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
[illegible]	54	58	93.10%	25.34%	279	285	97.89%	1.75	0.07
[illegible]	30	30	100.00%	0.00%	355	360	98.61%	-0.62	-1.38
[illegible]	35	37	94.59%	22.61%	255	257	99.22%	1.77	0.08
[illegible]	34	35	97.14%	16.66%	311	313	99.36%	1.05	-0.36
[illegible]	27	27	100.00%	0.00%	199	201	99.01%	-0.49	-1.3
[illegible]	21	21	100.00%	0.00%	158	161	98.14%	-0.59	-1.36
[illegible]	23	23	100.00%	0.00%	203	204	99.51%	-0.32	-1.19
[illegible]	15	15	100.00%	0.00%	207	209	99.04%	-0.37	-1.22
[illegible]	18	18	100.00%	0.00%	198	198	100.00%	N/A	N/A
[illegible]	29	29	100.00%	0.00%	203	205	99.02%	-0.5	-1.3
[illegible]	49	49	100.00%	0.00%	203	204	99.51%	-0.44	-1.27
[illegible]	44	44	100.00%	0.00%	219	221	99.10%	-0.58	-1.35



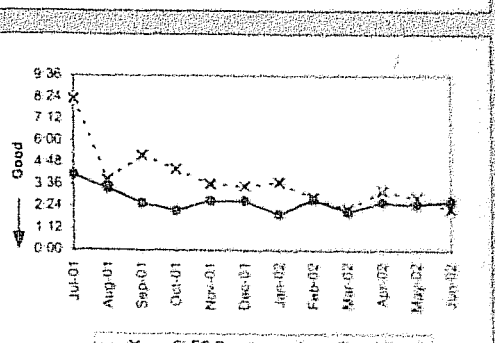
All Troubles Cleared within 48 hours (Percent) (MR-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
[illegible]	55	58	94.83%	22.15%	288	291	98.97%	1.84	0.12
[illegible]	30	30	100.00%	0.00%	359	360	99.72%	-0.28	-1.17
[illegible]	37	37	100.00%	0.00%	259	259	100.00%	N/A	N/A
[illegible]	36	36	100.00%	0.00%	313	313	100.00%	N/A	N/A
[illegible]	27	27	100.00%	0.00%	202	202	100.00%	N/A	N/A
[illegible]	21	21	100.00%	0.00%	161	162	99.38%	-0.34	-1.21
[illegible]	23	23	100.00%	0.00%	207	207	100.00%	N/A	N/A
[illegible]	15	15	100.00%	0.00%	209	210	99.52%	-0.26	-1.16
[illegible]	18	18	100.00%	0.00%	198	198	100.00%	N/A	N/A
[illegible]	29	29	100.00%	0.00%	206	206	100.00%	N/A	N/A
[illegible]	49	49	100.00%	0.00%	205	205	100.00%	N/A	N/A
[illegible]	44	44	100.00%	0.00%	222	222	100.00%	N/A	N/A



Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two

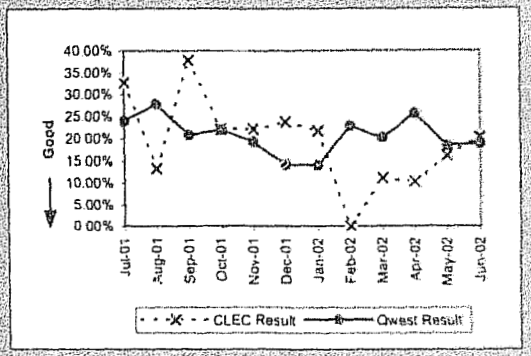
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
[illegible]	492:26	58	8:19	19:33	1197:06	291	4:07	1.73	0.05
[illegible]	210:14	30	3:52	4:48	1207:58	360	3:21	1:1	-0:33
[illegible]	191:39	37	5:11	7:24	663:52	259	2:34	2:14	0:3
[illegible]	160:56	36	4:28	6:26	683:07	313	2:11	1:26	-0:23
[illegible]	98:25	27	3:39	3:50	544:07	202	2:42	0:75	-0:55
[illegible]	73:58	21	3:31	3:04	435:39	162	2:41	0:76	-0:54
[illegible]	86:01	23	3:44	3:36	413:49	207	2:00	1:65	0:01
[illegible]	49:33	19	2:54	2:17	589:09	210	2:48	0:82	-0:5
[illegible]	41:02	18	2:17	1:41	417:39	198	2:07	0:37	-0:78
[illegible]	94:49	29	3:16	2:23	541:33	206	2:38	0:77	-0:53
[illegible]	141:49	49	2:54	2:58	512:46	205	2:30	0:57	-0:65
[illegible]	100:53	44	2:17	1:40	599:36	222	2:42	-0:64	-1:39



Checklist #4 - Unbundled Loop - ISDN Capable Repair

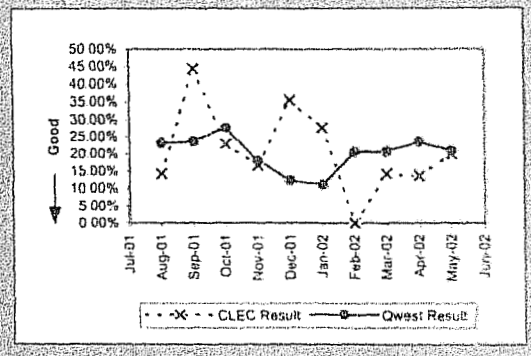
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Rest	Std Dev	Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Score
[illegible]	19	58	32.76%	46.93%	70	291	24.06%	1.36	-0.17
[illegible]	4	30	13.33%	33.99%	100	360	27.78%	-1.7	-2.03
[illegible]	14	37	37.84%	48.50%	54	259	20.85%	2.17	0.32
[illegible]	8	36	22.22%	41.57%	69	313	22.04%	0.04	-0.97
[illegible]	6	27	22.22%	41.57%	39	202	19.31%	0.37	-0.77
[illegible]	9	21	33.81%	42.59%	23	162	14.20%	1.11	-0.33
[illegible]	5	23	21.74%	41.25%	29	207	14.01%	0.96	-0.42
[illegible]	0	15	0.00%	0.00%	48	210	22.86%	-2.04	-2.24
[illegible]	2	18	11.11%	31.43%	40	198	20.20%	-0.92	-1.56
[illegible]	3	29	10.34%	30.45%	53	206	25.73%	-1.77	-2.08
[illegible]	8	49	16.33%	36.96%	38	205	18.54%	-0.36	-1.22
[illegible]	9	44	20.45%	40.34%	42	222	18.92%	0.25	-0.85



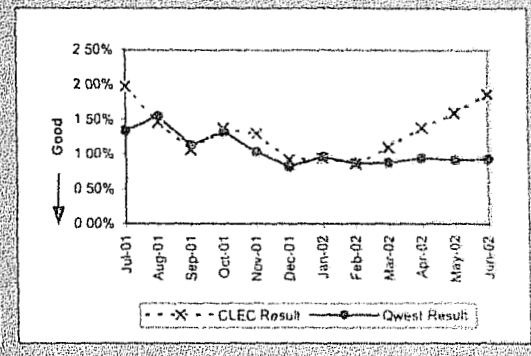
Repair Repeat Report Rate (Percent) (MR-7E*) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Rest	Std Dev	Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Score
[illegible]									
[illegible]	3	21	14.29%	34.99%	43	185	23.24%	-0.92	-1.56
[illegible]	12	27	44.44%	49.69%	26	110	23.64%	2.08	0.26
[illegible]	6	26	23.08%	42.13%	44	159	27.67%	-0.49	-1.3
[illegible]	4	24	16.67%	37.27%	16	89	17.98%	-0.15	-1.09
[illegible]	5	14	35.71%	47.92%	10	80	12.50%	1.97	0.2
[illegible]	5	18	27.78%	44.79%	10	88	11.36%	1.68	0.02
[illegible]	0	11	0.00%	0.00%	20	97	20.62%	-1.6	-1.97
[illegible]	2	14	14.29%	34.99%	23	111	20.72%	-0.56	-1.34
[illegible]	3	22	13.64%	34.32%	28	119	23.53%	-1	-1.61
[illegible]	7	35	20.00%	40.00%	23	110	20.91%	-0.12	-1.07
[illegible]									



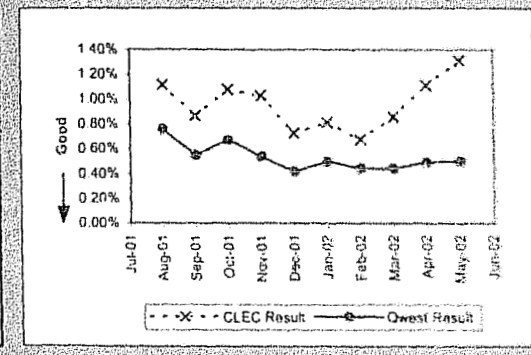
Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Rest	Std Dev	Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Score
[illegible]	299	15122	1.98%	13.92%	2517	187909	1.34%	6.56	2.99
[illegible]	230	15745	1.46%	12.00%	2097	187280	1.55%	-0.84	-1.51
[illegible]	192	16122	1.07%	10.27%	2111	186329	1.13%	-0.76	-1.46
[illegible]	224	16264	1.38%	11.65%	2453	185014	1.33%	0.55	-0.67
[illegible]	204	15732	1.30%	11.31%	1916	184334	1.04%	3.05	0.86
[illegible]	144	15563	0.93%	9.57%	1512	183312	0.82%	1.33	-0.19
[illegible]	140	15344	0.95%	9.71%	1753	182572	0.96%	-0.11	-1.06
[illegible]	129	14942	0.86%	9.25%	1578	180684	0.87%	-0.13	-1.08
[illegible]	165	15066	1.10%	10.43%	1571	178951	0.88%	2.8	0.7
[illegible]	206	14889	1.38%	11.68%	1664	177337	0.94%	5.41	2.29
[illegible]	239	14951	1.60%	12.54%	1629	175766	0.93%	8.23	4
[illegible]	260	14964	1.87%	13.55%	1628	174155	0.93%	11.42	5.94



Trouble Rate (Percent) (MR-8*) (Parity)-- Interval Zone One and Two

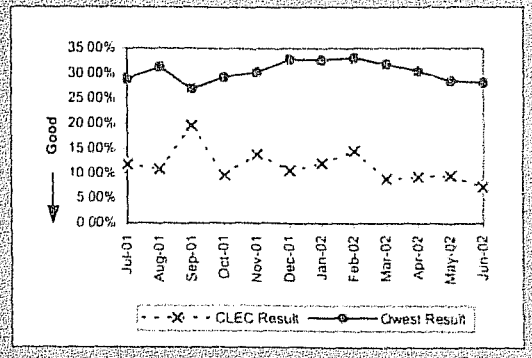
Date	CLEC Num	CLEC Den	CLEC Rest	Std Dev	Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Score
[illegible]									
[illegible]	176	15745	1.12%	10.51%	1416	187280	0.76%	5.03	2.06
[illegible]	140	16122	0.87%	9.28%	1029	186329	0.55%	5.2	2.16
[illegible]	176	16264	1.08%	10.35%	1249	185014	0.68%	6.08	2.7
[illegible]	162	15732	1.03%	10.10%	993	184334	0.54%	8.08	3.91
[illegible]	113	15563	0.73%	8.49%	770	183312	0.42%	5.67	2.45
[illegible]	125	15344	0.81%	8.99%	912	182572	0.50%	5.32	2.23
[illegible]	101	14942	0.68%	8.19%	804	180684	0.45%	4.08	1.48
[illegible]	130	15066	0.86%	9.23%	797	178951	0.45%	7.32	3.45
[illegible]	166	14889	1.11%	10.50%	874	177337	0.49%	10.41	5.33
[illegible]	196	14951	1.31%	11.37%	880	175766	0.50%	13.48	7.19
[illegible]									



Checklist #4 - Unbundled Loop - ISDN Capable Repair

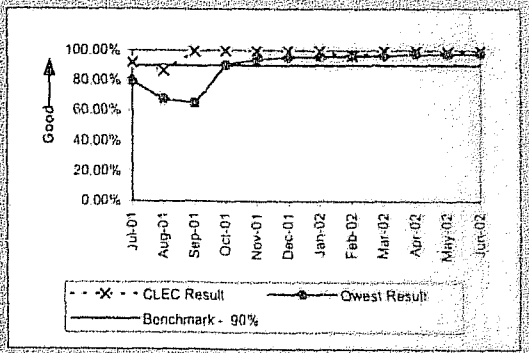
Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)– Interval Zone One and Two

					Qwest Num	Qwest Denom	Qwest Rate	Mod Z Scr	Parity Score
				32.26%	1016	3535	28.80%	-6.6	-5.01
				31.10%	1318	4215	31.27%	-6.87	-5.17
				33.77%	775	2886	26.85%	-2.3	-2.4
				29.57%	1015	3468	29.27%	-6.55	-4.98
				34.62%	832	2748	30.28%	-5.26	-4.2
				33.73%	739	2251	32.83%	-5.81	-4.53
				32.55%	850	2603	32.65%	-5.49	-4.34
				35.28%	783	2361	33.16%	-4.71	-3.88
				28.30%	732	2303	31.78%	-6.38	-4.88
				28.97%	727	2391	30.41%	-6.62	-5.03
				29.28%	649	2276	28.49%	-6.48	-4.94
				29.99%	636	2264	28.09%	-7.56	-5.59

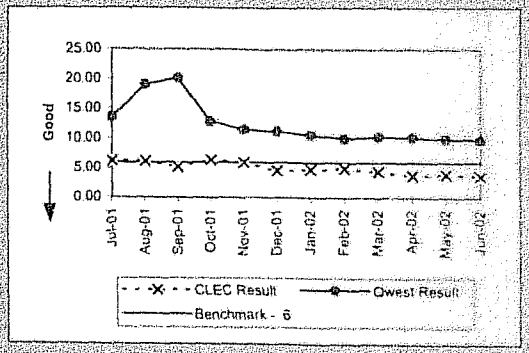


Checklist #4 - Unbundled Loop - ADSL Qualified Installation

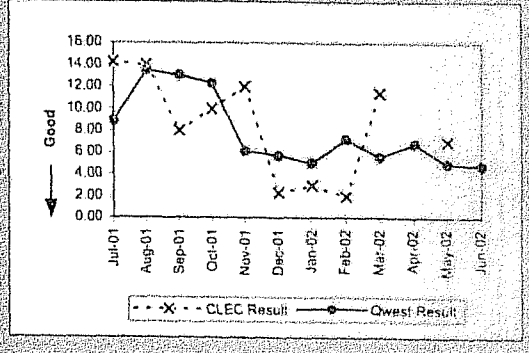
Percent Completions Met (Percent) (OP-3D) (Benchmark)-- Interval Zone One



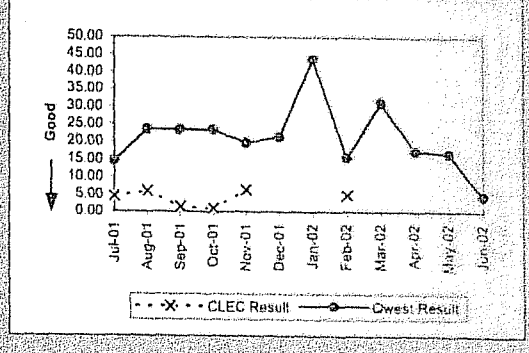
Installation Interval (Average Days) (OP-4D) (Benchmark)-- Interval Zone One



Installation Intervals for Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One



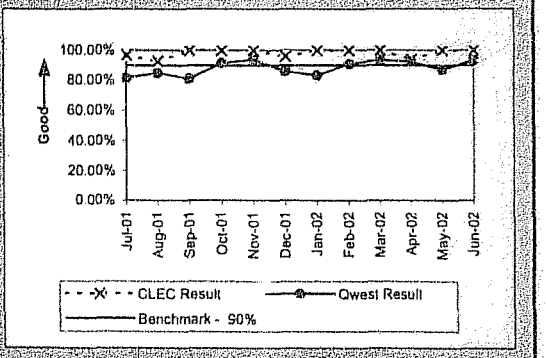
Installation Intervals for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One



Checklist #4 - Unbundled Loop - ADSL Qualified Installation

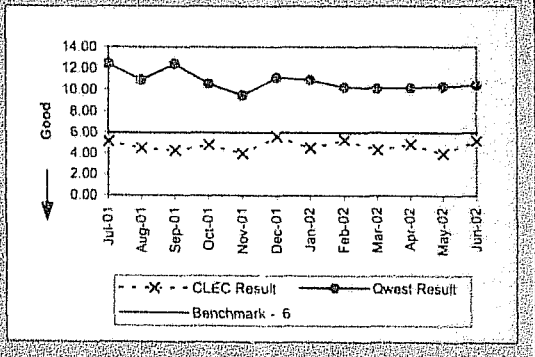
Mean Interval (OP-3E) (Benchmark) - Interval Zone Two

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
					147	180	81.67%	-2.05	-2.25
					172	203	84.73%	-1.5	-1.91
					152	126	80.95%	-2.29	-2.39
					118	129	91.47%	-1.42	-1.86
					105	112	93.75%	-0.97	-1.59
					111	129	86.05%	-1.72	-2.05
					109	131	83.21%	-2.62	-2.59
					160	176	90.91%	-1.62	-1.99
					149	159	93.71%	-1.79	-2.09
					157	170	92.35%	-0.39	-1.23
					133	153	86.93%	-1.29	-1.79
					136	145	93.10%	-1.21	-1.74



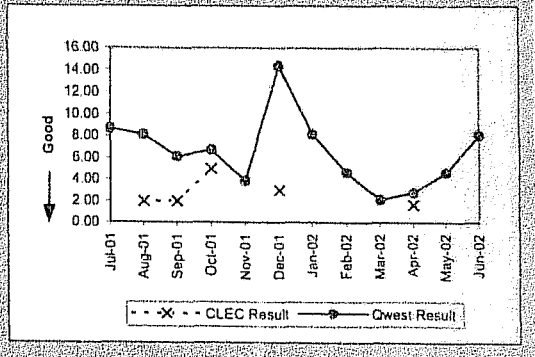
Mean Interval (OP-4E) (Benchmark) - Interval Zone Two

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
					2318	187	12.40	-2.47	-2.5
					2281	209	10.91	-4.86	-3.95
					1619	130	12.45	-3.28	-3
					1394	132	10.56	-2.99	-2.82
					1569	113	9.46	-3.74	-3.27
					1471	132	11.14	-2.02	-2.23
					1473	135	10.91	-5.8	-4.53
					1851	182	10.23	-4.71	-3.86
					1615	160	10.09	-7.31	-5.45
					1770	174	10.17	-8.9	-6.41
					1033	150	10.27	-4.19	-3.55
					1364	152	10.42	-4.14	-3.52



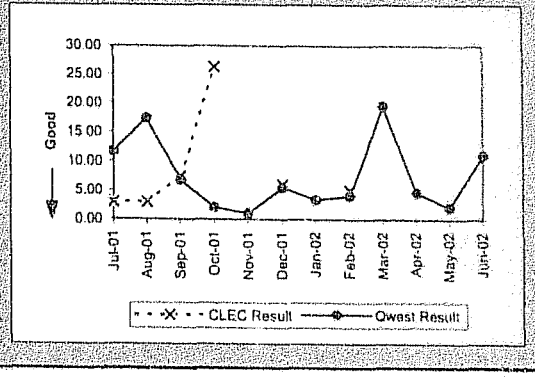
Mean Interval (Average Days) (OP-6A-5) (Parity) - Interval Zone Two

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
					218	25	8.72		
					252	31	8.13	-1.43	-1.87
					135	22	6.14	-0.48	-1.29
					81	12	6.75	-0.18	-1.11
					27	7	3.86		
					245	17	14.41	-0.47	-1.28
					156	19	8.21		
					60	13	4.62		
					17	8	2.12		
					25	9	2.78	-0.5	-1.3
					93	20	4.65		
					73	9	8.11		



Mean Interval (Average Days) (OP-6B-5) (Parity) - Interval Zone Two

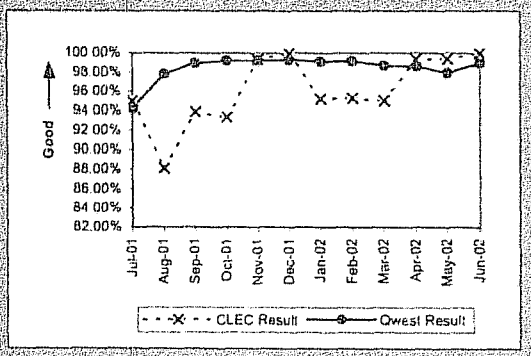
					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
					175	15	11.73	-1.36	-1.83
					87	5	17.40	-2.17	-2.32
					41	6	6.83	0.15	-0.91
					4	2	2.00		
					1	1	1.00		
					11	2	5.50	-0.65	-1.39
					10	3	3.33		
					12	3	4.00	0.44	-0.73
					39	2	19.50		
					23	5	4.60		
					2	1	2.00		
					11	1	11.00		



Checklist #4 - Unbundled Loop - ADSL Qualified Installation

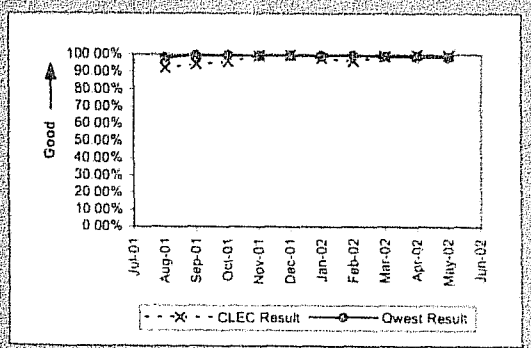
Interval Zone One and Two

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
				9373	9573	94.25%	-0.4	-1.24
				7397	7552	97.82%	5.35	2.25
				9734	9834	98.95%	3.9	1.37
				10146	10279	98.19%	4.94	2.01
				9099	9171	99.21%	-0.14	-1.08
				8436	8497	99.28%	-0.88	-1.53
				8034	8107	99.10%	2.96	0.8
				7284	7346	99.16%	2.72	0.65
				6763	6852	98.70%	2.5	0.52
				6614	6707	98.61%	-0.8	-1.49
				6263	6396	97.92%	-1.3	-1.79
				5947	5997	99.98%	-1.19	-1.72



Interval Zone One and Two

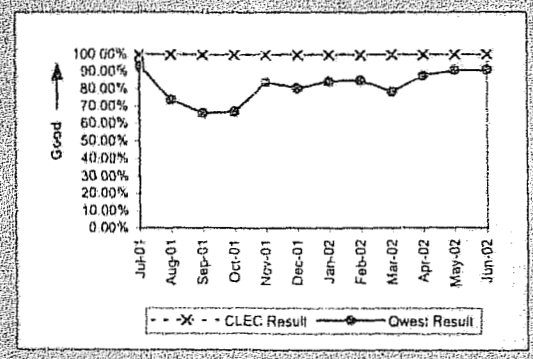
				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
				7429	7562	98.24%	3.72	1.26
				9787	9834	99.22%	3.89	1.36
				10410	10229	98.42%	3.6	1.19
				9199	9171	99.32%	0.11	-0.93
				8451	8497	99.46%	-0.76	-1.46
				8048	8107	99.27%	1.23	-0.25
				7203	7346	98.28%	2.22	0.35
				6787	6852	99.08%	-0.03	-1.02
				6629	6707	98.84%	-1.35	-1.82
				6294	6396	98.41%	-0.99	-1.6



Checklist #4 - Unbundled Loop - ADSL Qualified Repair

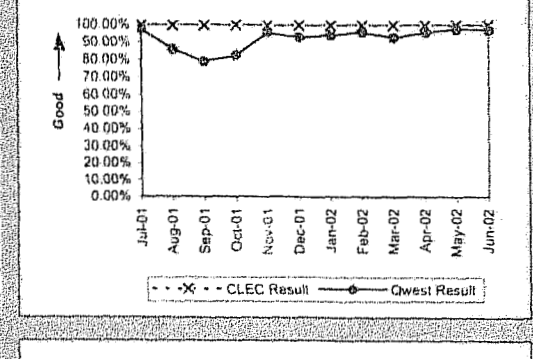
Interval Zone One

				3349	3522	93.75%	-1.43	-1.86
				3681	5001	73.76%	-3.32	-3.02
				3512	5403	65.14%	-3.19	-2.94
				2981	3329	67.02%	-3.49	-3.12
				1972	2156	84.05%	-1.52	-1.95
				1911	2151	80.53%	-1.83	-2.11
				2113	2409	84.99%	-1.82	-2.11
				1378	1556	85.03%	-1.45	-1.88
				1067	1264	78.59%	-1.95	-2.18
				2313	2519	87.82%	-1.18	-1.71
				2335	2535	90.80%	-1.23	-1.75
				2168	2291	91.00%	-0.63	-1.38



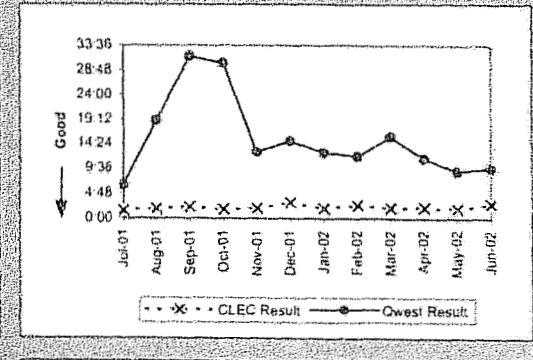
Interval Zone One

				3489	3572	97.68%	-0.87	-1.53
				6359	6807	80.06%	-2.23	-2.36
				2538	3206	79.16%	-2.29	-2.39
				2697	3166	82.61%	-2.29	-2.39
				2171	2167	99.71%	-0.76	-1.46
				1975	2128	93.00%	-1.02	-1.62
				2358	2435	94.25%	-1.04	-1.63
				1854	1918	95.91%	-0.71	-1.43
				1950	2065	97.72%	-1.04	-1.64
				1908	2023	96.80%	-0.66	-1.4
				2430	2530	97.61%	-0.6	-1.37
				2031	2292	92.45%	-0.32	-1.2



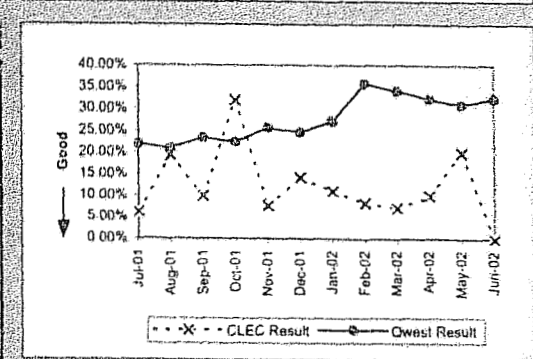
Interval Zone One

				3372	6.24	-1.84	-2.12	
				5907	19.05	-2.84	-2.73	
				3265	31.32	-2.43	-2.48	
				3166	39.15	-2.74	-2.67	
				2167	12.51	-2.05	-2.24	
				2128	14.56	-1.84	-2.12	
				2435	12.40	-1.96	-2.19	
				1918	12.03	-1.82	-2.11	
				2065	15.56	-2.05	-2.24	
				2023	11.38	-1.46	-1.89	
				2556	9.06	-1.67	-2.02	
				2292	9.45	-0.64	-1.39	



Interval Zone One

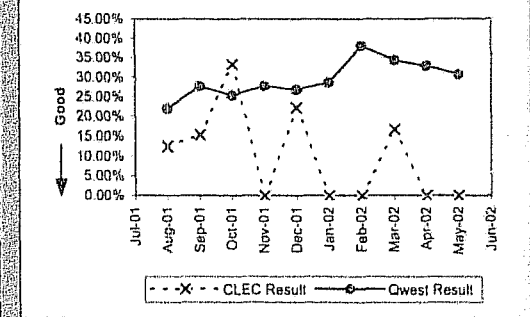
				3551	21.92%	-2.13	-2.3	
				5907	21.09%	-0.23	-1.14	
				3265	23.40%	-1.41	-1.86	
				3180	22.48%	1.11	-0.33	
				2262	25.66%	-1.48	-1.9	
				2128	24.67%	-0.9	-1.55	
				2435	27.33%	-1.53	-1.93	
				1915	35.82%	-1.68	-2.2	
				2065	34.11%	-2.12	-2.29	
				2023	32.43%	-1.51	-1.92	
				2556	31.03%	-0.92	-1.56	
				2292	32.33%	-1.38	-1.84	



Checklist #4 - Unbundled Loop - ADSL Qualified Repair

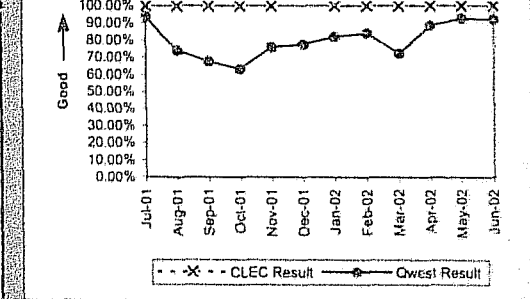
Percent Missed Repair Appointments (MR-7E) (Parity) - Interval Zone One

			Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
			820	3718	22.05%	-0.92	-1.56
			519	1871	27.74%	-0.99	-1.6
			471	1856	25.38%	0.63	-0.62
			403	1450	27.79%	-1.24	-1.75
			366	1366	26.79%	-0.31	-1.19
			457	1590	28.74%	-1.68	-2.02
			413	1083	38.13%	-1.92	-2.17
			488	1418	34.41%	-0.91	-1.56
			447	1360	32.87%	-1.56	-1.95
			512	1687	30.71%	-1.76	-2.07



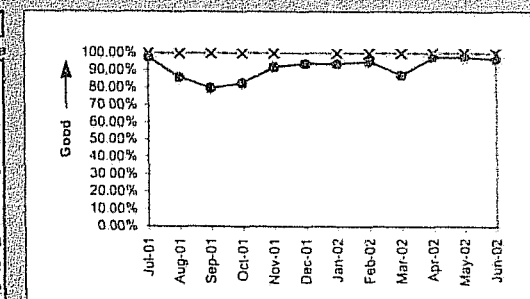
Percent Missed Repair Appointments (MR-3E) (Parity) - Interval Zone Two

			Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
			617	658	93.77%	-0.36	-1.22
			659	824	79.91%	-2.2	-2.34
			298	440	67.73%	-1.53	-1.93
			327	509	63.26%	-1.32	-1.8
			277	364	76.10%	-1.11	-1.68
			271	349	77.65%		
			329	400	82.25%	-0.92	-1.56
			224	266	84.21%	-1.05	-1.64
			238	318	72.33%	-1.37	-1.83
			241	272	88.60%	-0.71	-1.43
			417	450	92.67%	-0.68	-1.42
			229	249	91.97%	-0.42	-1.25



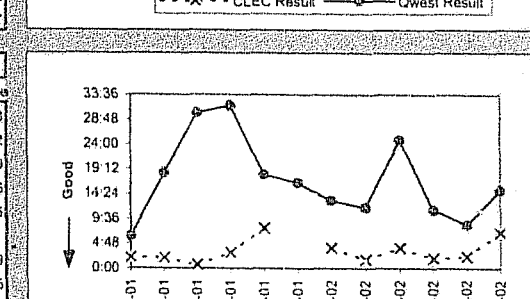
Percent Missed Repair Appointments (Trended) (MR-4E) (Parity) - Interval Zone Two

			Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
			642	658	97.57%	-0.22	-1.14
			709	824	86.04%	-1.49	-1.91
			351	440	79.77%	-1.12	-1.68
			424	513	82.65%	-0.79	-1.48
			341	371	91.91%	-0.59	-1.36
			331	352	94.03%		
			377	402	93.78%	-0.51	-1.31
			253	266	95.11%	-0.55	-1.33
			278	319	87.15%	-0.85	-1.52
			266	273	97.44%	-0.32	-1.2
			441	451	97.78%	-0.37	-1.22
			240	249	96.39%	-0.27	-1.17



Average Duration of Repairs Measured (MR-8E) (Parity) - Interval Zone Two

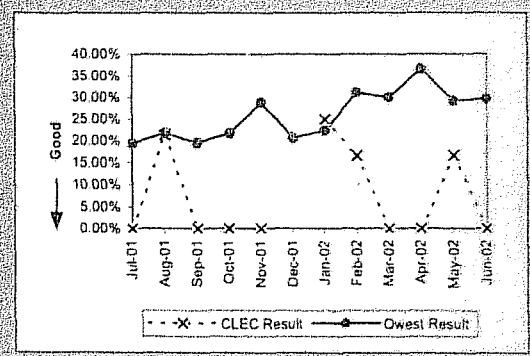
			Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
			4123.13	658	6:16	-0.46	-1.28
			15226.27	824	18:29	-1.85	-2.12
			13230.53	440	30:04	-1.3	-1.79
			10161.33	513	31:30	-0.99	-1.6
			6709.20	371	18:05	-0.59	-1.36
			5829.23	352	16:32		
			5276.36	402	13:08	-0.8	-1.49
			3137.55	266	11:46	-1.39	-1.85
			7933.22	319	24:52	-0.7	-1.42
			3066.51	273	11:18	-1.24	-1.76
			3794.22	451	8:25	-1.12	-1.68
			3758.41	249	15:08	-0.16	-1.09



Checklist #4 - Unbundled Loop - ADSL Qualified Repair

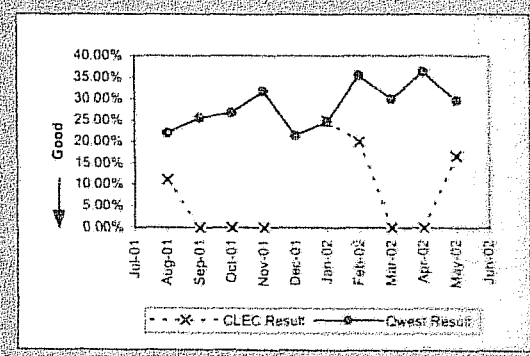
Trouble Report Rate (Percent) (MR-7E) (Parity) -- Interval Zone Two

					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Score
			0.00%	0.00%	128	658	19.45%	-0.69	-1.42
			27.43%	41.03%	180	824	21.84%	-0.04	-1.02
			0.00%	0.00%	86	440	19.55%	-1.1	-1.67
			0.00%	0.00%	112	513	21.83%	-0.91	-1.55
			0.00%	0.00%	107	371	28.84%	-1.27	-1.77
					73	352	20.74%		
			25.00%	43.30%	90	402	22.39%	0.16	-0.91
			16.67%	37.27%	83	266	31.20%	-0.76	-1.46
			0.00%	0.00%	96	319	30.09%	-1.46	-1.89
			0.00%	0.00%	100	273	36.63%	-1.51	-1.92
			16.67%	37.27%	132	451	29.27%	-0.67	-1.41
			0.00%	0.00%	74	249	29.72%	-0.92	-1.56



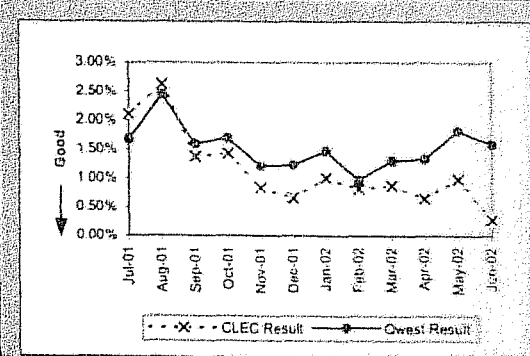
Trouble Report Rate (Percent) (MR-7E) (Parity) -- Interval Zone Two

					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Score
			11.11%	31.43%	125	566	22.08%	-0.79	-1.48
			0.00%	0.00%	63	246	25.61%	-1.01	-1.61
			0.00%	0.00%	81	302	26.82%	-1.04	-1.63
			0.00%	0.00%	69	217	31.80%	-1.17	-1.71
					51	237	21.52%		
			25.00%	43.30%	61	247	24.70%	0.05	-0.97
			33.33%	48.05%	65	183	35.52%	-0.72	-1.43
			0.00%	0.00%	66	220	30.00%	-1.13	-1.68
			0.00%	0.00%	65	179	36.31%	-1.3	-1.79
			16.67%	37.27%	84	284	29.58%	-0.69	-1.42



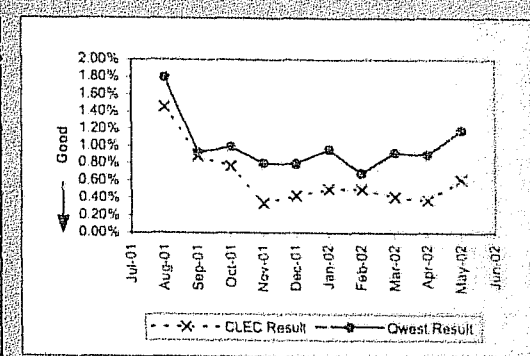
Trouble Rate (Percent) (MR-8) (Parity) -- Interval Zone One and Two

					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Score
			0.11%	14.36%	4230	252102	1.68%	1.33	-0.19
			0.63%	15.99%	5931	238364	2.45%	0.48	-0.71
			1.38%	11.68%	3645	227625	1.60%	-0.73	-1.45
			1.43%	11.99%	3693	217706	1.70%	-0.89	-1.54
			0.84%	9.13%	2538	208053	1.22%	-1.56	-1.95
			0.67%	8.15%	2460	200987	1.23%	-2.34	-2.42
			1.02%	10.02%	2837	191123	1.48%	-1.8	-2.09
			0.92%	9.04%	1782	183565	0.97%	-0.7	-1.42
			0.88%	9.36%	2324	177040	1.31%	-1.74	-2.06
			0.68%	8.06%	2296	170937	1.34%	-2.73	-2.66
			1.00%	9.93%	3007	164670	1.83%	-2.83	-2.72
			0.29%	5.36%	2541	159033	1.60%	-4.74	-3.88



Trouble Rate (Percent) (MR-8) (Parity) -- Interval Zone One and Two

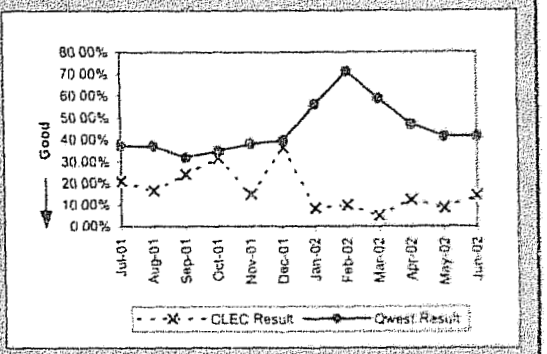
					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Score
			1.46%	11.99%	4284	238364	1.80%	-1.05	-1.64
			0.89%	9.37%	2117	227625	0.93%	-0.2	-1.12
			0.97%	8.73%	2158	217706	0.99%	-0.99	-1.6
			0.35%	5.86%	1667	208053	0.80%	-2.29	-2.39
			0.45%	6.54%	1603	200987	0.80%	-1.89	-2.15
			0.53%	7.11%	1637	191123	0.96%	-2.15	-2.31
			0.50%	7.08%	1266	183565	0.69%	-1.05	-1.64
			0.42%	6.46%	1638	177040	0.93%	-2.44	-2.48
			0.38%	6.12%	1539	170937	0.90%	-2.55	-2.55
			0.42%	7.83%	1951	164670	1.18%	-2.4	-2.46



Checklist #4 - Unbundled Loop - ADSL Qualified Repair

Customer Trouble Report Rate - Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)– Interval Zone One and Two

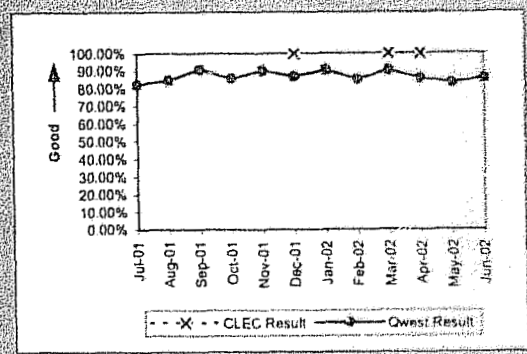
	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
[illegible]	9	43	20.93%	49.68%	2498	6728	37.13%	-2.19	-2.33
[illegible]	9	54	16.67%	37.27%	3429	9260	37.03%	-3.09	-2.88
[illegible]	8	33	24.24%	42.86%	1706	5351	31.88%	-0.94	-1.57
[illegible]	13	41	31.71%	46.53%	1992	5685	35.04%	-0.45	-1.27
[illegible]	3	20	15.00%	35.71%	1569	4107	38.20%	-2.13	-2.3
[illegible]	8	22	36.36%	48.10%	1622	4102	39.54%	-0.3	-1.15
[illegible]	2	24	8.33%	27.64%	3596	6433	55.90%	-4.66	-3.85
[illegible]	2	20	10.00%	30.00%	4407	6189	71.21%	-6.04	-4.67
[illegible]	1	20	5.00%	21.79%	3335	5659	58.93%	-4.89	-3.98
[illegible]	2	16	12.50%	33.07%	2041	4337	47.06%	-2.76	-2.68
[illegible]	2	20	6.70%	28.18%	2144	5151	41.62%	-3.2	-2.94
[illegible]	1	7	14.29%	34.99%	1804	4345	41.52%	-1.46	-1.89



Checklist #4 - Unbundled Loop - Installation for DS3 and Higher

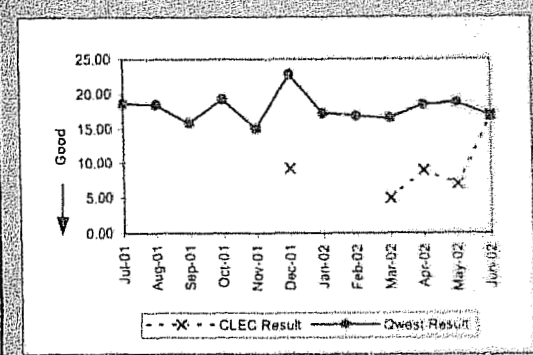
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
					141	171	82.46%		
					140	165	84.85%		
					212	233	90.99%		
					169	197	85.79%		
					156	173	90.17%		
	1	1	100.00%	0.00%	141	162	87.04%	-0.38	-1.23
					220	243	90.54%		
					118	138	85.51%		
	1	1	100.00%	0.00%	273	302	90.40%	-0.33	-1.2
	1	1	100.00%	0.00%	189	220	85.91%	-0.4	-1.25
					145	174	83.33%		
					197	229	86.03%		



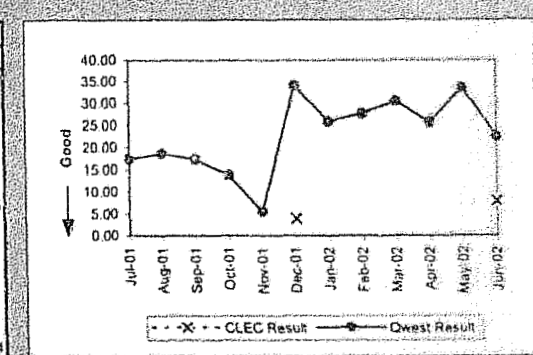
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
					7591	406	18.70		
					6486	351	18.48		
					7901	498	15.87		
					9329	483	19.31		
					4724	313	15.09		
	37	4	9.25	3.77	6202	271	22.89	-1.17	-1.71
					7139	414	17.24		
					4336	257	16.87		
	5	1	5.00		7026	424	16.57	-0.67	-1.41
	9	1	9.00		6947	375	18.53	-0.59	-1.36
	7	1	7.00		6169	328	18.81	-0.62	-1.38
	17	1	17.00		5782	342	16.91	0.31	-0.81



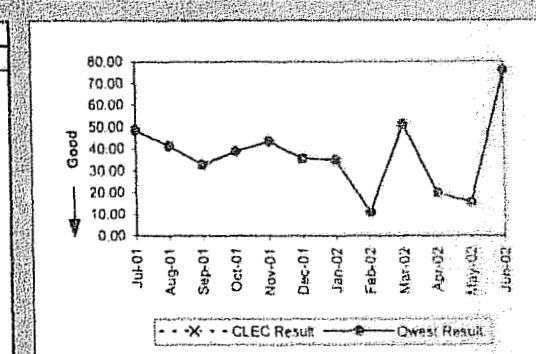
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
					1807	104	17.38		
					1697	91	18.65		
					1513	87	17.39		
					1864	135	13.81		
					892	161	5.54		
	12	3	4.00	1.73	1295	38	34.08	-1.23	-1.75
					1162	45	25.82		
					910	33	27.58		
					1643	54	30.43		
					1231	48	25.65		
					1604	48	33.42		
	8	1	8.00		967	43	22.49	-0.57	-1.34



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

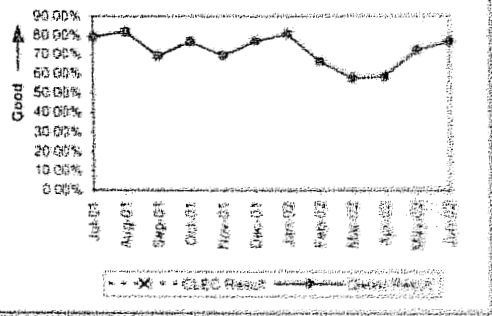
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
					291	6	48.50		
					248	6	41.33		
					263	8	32.88		
					388	10	38.80		
					217	5	43.40		
					107	3	35.67		
					70	2	35.00		
					11	1	11.00		
					102	2	51.00		
					60	3	20.00		
					31	2	15.50		
					76	1	76.00		



Checklist #4 - Unbundled Loop - Installation for DS3 and Higher

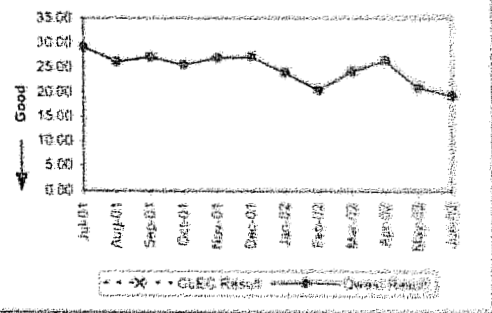
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					34	43	79.07%		
Aug-01					50	61	81.97%		
Sep-01					41	59	69.49%		
Oct-01					56	73	76.71%		
Nov-01					64	92	69.57%		
Dec-01					64	83	77.11%		
Jan-02					68	84	80.95%		
Feb-02					43	65	66.15%		
Mar-02					42	73	57.53%		
Apr-02					41	70	58.57%		
May-02					63	87	72.41%		
Jun-02					76	99	76.77%		



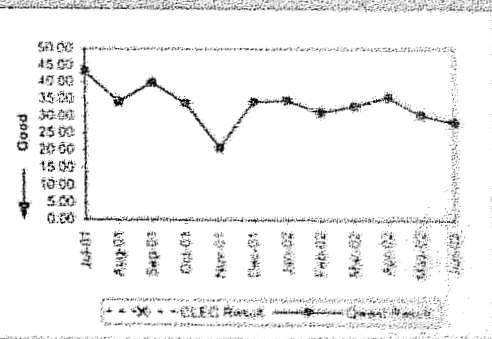
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					4543	156	29.12		
Aug-01					3559	136	26.17		
Sep-01					3672	135	27.20		
Oct-01					5137	201	25.56		
Nov-01					4316	160	26.98		
Dec-01					3726	137	27.20		
Jan-02					3554	148	24.01		
Feb-02					2213	108	20.49		
Mar-02					3048	126	24.19		
Apr-02					3839	145	26.48		
May-02					3297	157	21.00		
Jun-02					2926	151	19.38		



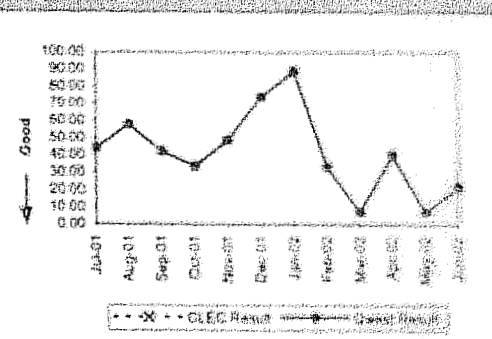
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					2248	52	43.23		
Aug-01					1506	44	34.23		
Sep-01					1516	38	39.89		
Oct-01					2261	67	33.75		
Nov-01					1841	88	20.92		
Dec-01					1158	34	34.35		
Jan-02					900	26	34.62		
Feb-02					841	27	31.15		
Mar-02					1551	47	33.00		
Apr-02					1752	49	35.76		
May-02					1037	34	30.56		
Jun-02					986	35	28.17		



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

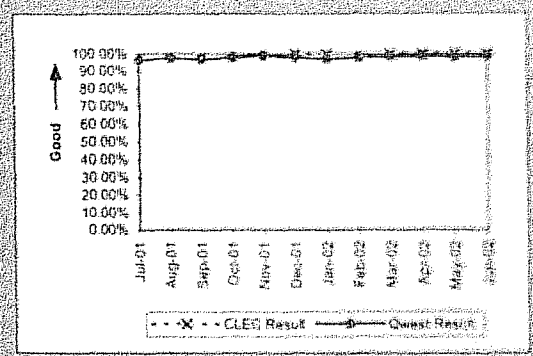
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					264	6	44.00		
Aug-01					347	6	57.83		
Sep-01					337	8	42.12		
Oct-01					202	6	33.67		
Nov-01					537	11	48.82		
Dec-01					370	5	74.00		
Jan-02					356	4	89.00		
Feb-02					67	2	33.50		
Mar-02					15	2	7.50		
Apr-02					121	3	40.33		
May-02					15	2	7.50		
Jun-02					44	2	22.00		



Checklist #4 - Unbundled Loop - Installation for DS3 and Higher

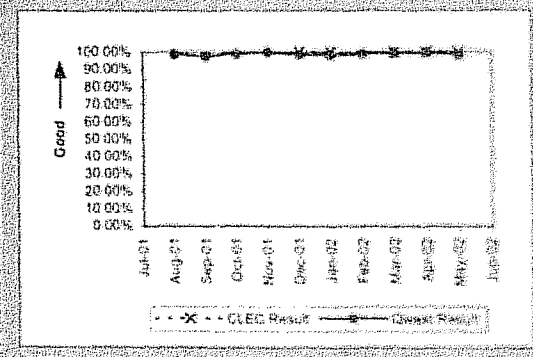
New Service Installation Quality (Percent) (OP-5) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					529	547	96.71%		
Aug-01					524	536	97.76%		
Sep-01					559	576	97.05%		
Oct-01					675	689	97.97%		
Nov-01					604	609	99.18%		
Dec-01	2	2	100.00%	0.00%	445	454	98.02%	-0.2	-1.12
Jan-02	2	2	100.00%	0.00%	488	502	97.21%	-0.24	-1.15
Feb-02					467	476	98.11%		
Mar-02	1	1	100.00%	0.00%	460	467	98.50%	-0.12	-1.07
Apr-02	1	1	100.00%	0.00%	537	544	98.71%	-0.11	-1.07
May-02	1	1	100.00%	0.00%	500	510	98.04%	-0.14	-1.09
Jun-02	1	1	100.00%	0.00%	488	496	98.39%	-0.13	-1.08



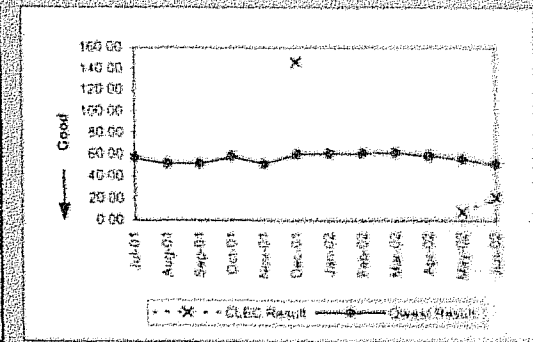
New Service Installation Quality (Percent) (OP-5*) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					528	536	98.51%		
Sep-01					562	576	97.57%		
Oct-01					680	689	98.69%		
Nov-01					607	609	99.67%		
Dec-01	2	2	100.00%	0.00%	446	454	98.24%	-0.19	-1.11
Jan-02	2	2	100.00%	0.00%	492	502	98.01%	-0.2	-1.12
Feb-02					469	476	98.53%		
Mar-02	1	1	100.00%	0.00%	463	467	99.14%	-0.09	-1.06
Apr-02	1	1	100.00%	0.00%	540	544	99.26%	-0.09	-1.05
May-02	1	1	100.00%	0.00%	500	510	98.04%	-0.14	-1.09
Jun-02									



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

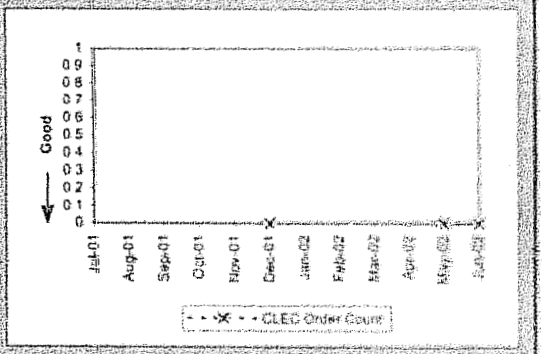
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					12089	213	56.76		
Aug-01					12347	239	51.66		
Sep-01					12570	243	51.73		
Oct-01					12902	223	57.86		
Nov-01					11028	215	51.29		
Dec-01	146	1	146.00		10041	167	60.13	1.36	-0.17
Jan-02					10005	164	61.01		
Feb-02					9674	158	61.23		
Mar-02					9604	155	61.96		
Apr-02					10246	174	58.89		
May-02	8	1	8.00		10730	192	55.89	-0.57	-1.35
Jun-02	42	2	21.00	9.90	11437	224	51.06	-0.51	-1.31



Checklist #4 - Unbundled Loop - Installation for DS3 and Higher

Count of Pending Orders Delayed for Facilities Reasons Unbundled Loop - DS3 Capable (OP-15B) (Diagnostic)

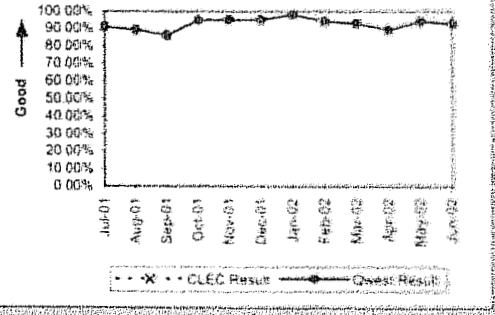
Date	CLEC Order Count
Jul-01	
Aug-01	
Sep-01	
Oct-01	
Nov-01	
Dec-01	0
Jan-02	
Feb-02	
Mar-02	
Apr-02	
May-02	0
Jun-02	0



Checklist #4 - Unbundled Loop - Repair for DS3 and Higher

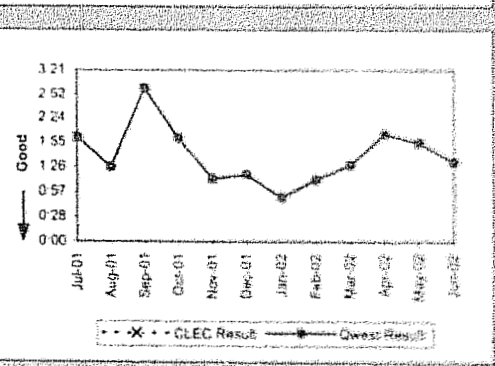
All Troubles Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					90	99	90.91%		
Aug-01					101	113	89.38%		
Sep-01					133	154	86.36%		
Oct-01					128	135	94.81%		
Nov-01					121	127	95.28%		
Dec-01					98	103	95.15%		
Jan-02					116	118	98.31%		
Feb-02					83	88	94.32%		
Mar-02					95	102	93.14%		
Apr-02					101	113	89.38%		
May-02					100	106	94.34%		
Jun-02					106	114	92.98%		



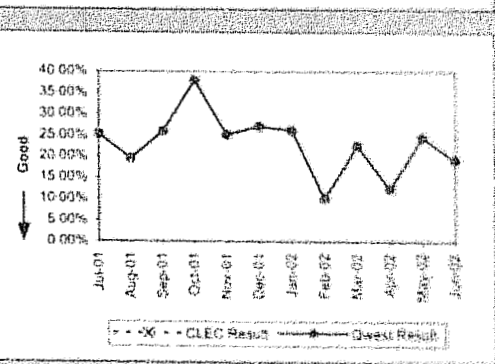
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					199 17	99	2:01		
Aug-01					161 41	113	1:26		
Sep-01					461 47	154	3:00		
Oct-01					270 13	135	2:00		
Nov-01					154 42	127	1:13		
Dec-01					134 43	103	1:18		
Jan-02					101 44	118	0:52		
Feb-02					106 00	88	1:12		
Mar-02					151 40	102	1:29		
Apr-02					235 19	113	2:05		
May-02					202 45	106	1:55		
Jun-02					175 54	114	1:33		



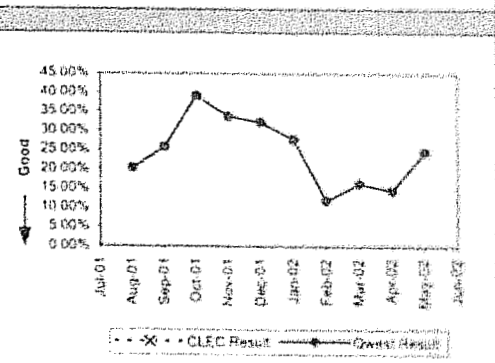
Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					25	99	25.25%		
Aug-01					22	113	19.47%		
Sep-01					40	154	25.97%		
Oct-01					51	135	37.78%		
Nov-01					32	127	25.20%		
Dec-01					28	103	27.18%		
Jan-02					31	118	26.27%		
Feb-02					9	88	10.23%		
Mar-02					23	102	22.55%		
Apr-02					14	113	12.39%		
May-02					26	106	24.53%		
Jun-02					22	114	19.30%		



Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

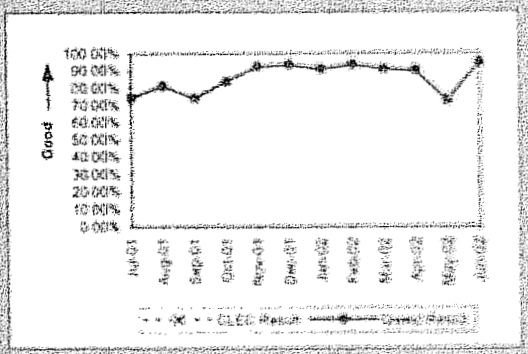
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					14	69	20.29%		
Sep-01					24	93	25.81%		
Oct-01					27	69	39.13%		
Nov-01					23	68	33.82%		
Dec-01					20	62	32.26%		
Jan-02					17	61	27.87%		
Feb-02					6	50	12.00%		
Mar-02					9	55	16.36%		
Apr-02					9	62	14.52%		
May-02					14	57	24.56%		
Jun-02									



Checklist #4 - Unbundled Loop - Repair for DS3 and Higher

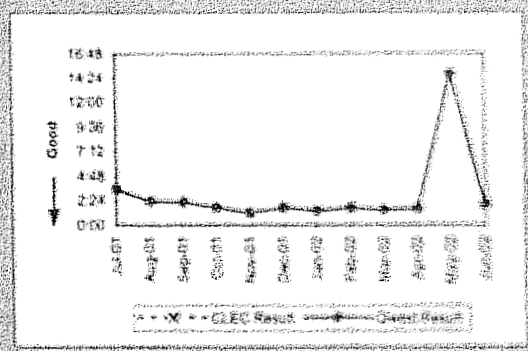
All Troubles Cleared within 4 hours (Percent) (MR-5B) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					38	51	74.51%		
Aug-01					35	43	81.40%		
Sep-01					29	39	74.36%		
Oct-01					31	37	83.78%		
Nov-01					25	27	92.59%		
Dec-01					29	31	93.55%		
Jan-02					50	55	90.91%		
Feb-02					29	31	93.55%		
Mar-02					30	33	90.91%		
Apr-02					37	41	90.24%		
May-02					27	37	72.97%		
Jun-02					34	36	94.44%		



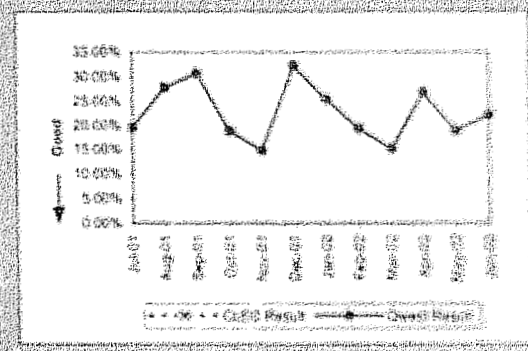
Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					180:02	51	3:32		
Aug-01					102:00	43	2:22		
Sep-01					87:29	39	2:15		
Oct-01					63:25	37	1:43		
Nov-01					33:26	27	1:14		
Dec-01					54:53	31	1:46		
Jan-02					78:33	55	1:26		
Feb-02					53:16	31	1:43		
Mar-02					50:27	33	1:32		
Apr-02					66:52	41	1:38		
May-02					546:21	37	14:46		
Jun-02					73:19	36	2:02		



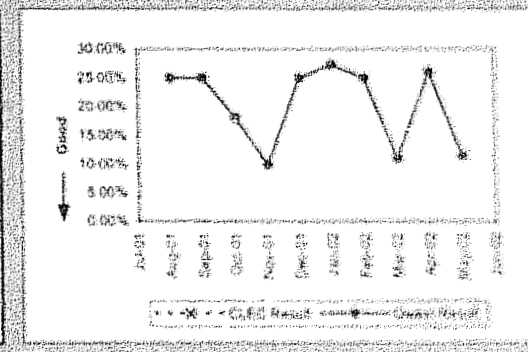
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					10	51	19.61%		
Aug-01					12	43	27.91%		
Sep-01					12	39	30.77%		
Oct-01					7	37	18.92%		
Nov-01					4	27	14.81%		
Dec-01					10	31	32.26%		
Jan-02					14	55	25.45%		
Feb-02					6	31	19.35%		
Mar-02					5	33	15.15%		
Apr-02					11	41	26.83%		
May-02					7	37	18.92%		
Jun-02					8	36	22.22%		



Repair Repeat Report Rate (Percent) (MR-7E*) (Parity)-- Interval Zone Two

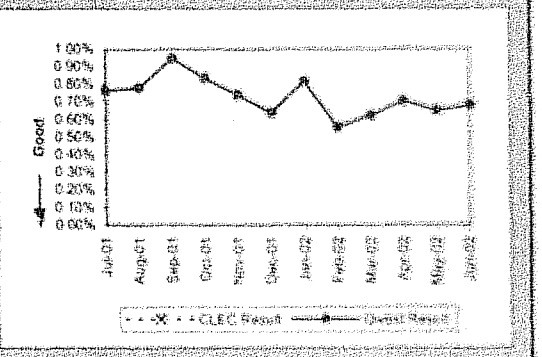
Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					9	36	25.00%		
Sep-01					7	28	25.00%		
Oct-01					4	22	18.18%		
Nov-01					1	10	10.00%		
Dec-01					4	16	25.00%		
Jan-02					9	33	27.27%		
Feb-02					5	20	25.00%		
Mar-02					2	18	11.11%		
Apr-02					6	23	26.09%		
May-02					3	26	11.54%		
Jun-02									



Checklist #4 - Unbundled Loop - Repair for DS3 and Higher

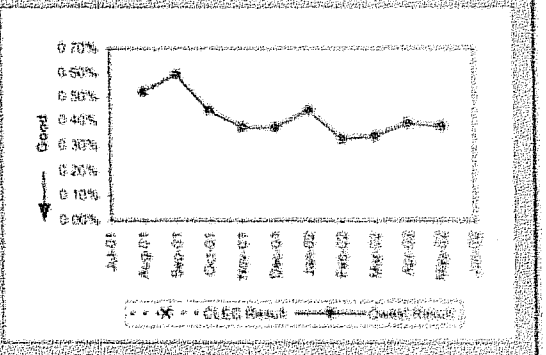
Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					150	19686	0.76%		
Aug-01					156	20036	0.78%		
Sep-01					193	20400	0.95%		
Oct-01					172	20591	0.84%		
Nov-01					154	20806	0.74%		
Dec-01					134	21020	0.64%		
Jan-02					173	21223	0.82%		
Feb-02					119	21400	0.56%		
Mar-02					135	21641	0.62%		
Apr-02					154	21880	0.70%		
May-02					143	21962	0.65%		
Jun-02					150	22094	0.68%		



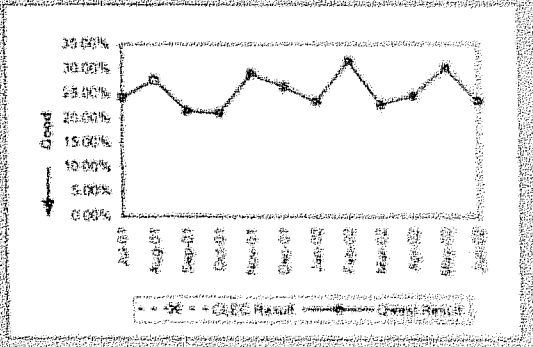
Trouble Rate (Percent) (MR-8*) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					105	20036	0.52%		
Sep-01					121	20400	0.59%		
Oct-01					91	20591	0.44%		
Nov-01					78	20806	0.37%		
Dec-01					78	21020	0.37%		
Jan-02					94	21223	0.44%		
Feb-02					70	21400	0.33%		
Mar-02					73	21641	0.34%		
Apr-02					85	21880	0.39%		
May-02					83	21962	0.38%		
Jun-02									



Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)-- Interval Zone One and Two

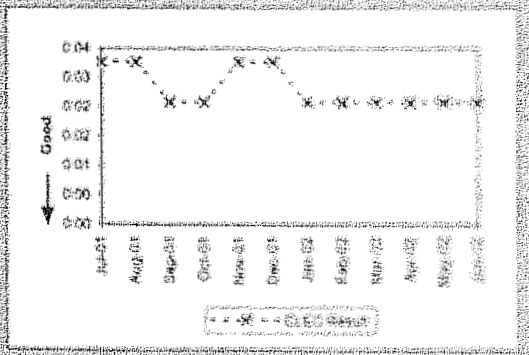
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					48	198	24.24%		
Aug-01					60	216	27.78%		
Sep-01					53	246	21.54%		
Oct-01					46	218	21.10%		
Nov-01					63	217	29.03%		
Dec-01					48	182	26.37%		
Jan-02					53	226	23.45%		
Feb-02					55	174	31.61%		
Mar-02					40	175	22.86%		
Apr-02					50	204	24.51%		
May-02					62	205	30.24%		
Jun-02					46	196	23.47%		



Checklist #4 - Unbundled Loop Cutovers

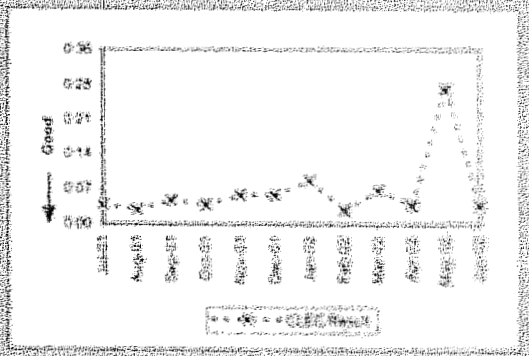
OP-7 - Coordinated "Hot Cut" Interval - Unbundled Loops (Hours:Minutes) Unbundled Loop - Analog (OP-7) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	671:03	10884	0:04
Aug-01	715:15	12138	0:04
Sep-01	680:05	11766	0:03
Oct-01	1158:29	20448	0:03
Nov-01	1043:21	17336	0:04
Dec-01	1062:47	17775	0:04
Jan-02	607:17	10915	0:03
Feb-02	472:51	9335	0:03
Mar-02	429:27	7880	0:03
Apr-02	596:29	10912	0:03
May-02	455:32	9178	0:03
Jun-02	357:37	6895	0:03



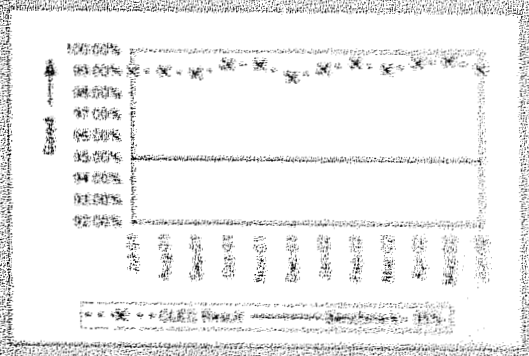
OP-7 - Coordinated "Hot Cut" Interval - Unbundled Loops (Hours:Minutes) Unbundled Loop Other (OP-7) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	1:40	27	0:04
Aug-01	6:16	111	0:03
Sep-01	7:59	90	0:05
Oct-01	3:21	55	0:04
Nov-01	4:35	49	0:06
Dec-01	4:39	50	0:06
Jan-02	7:13	47	0:09
Feb-02	3:23	60	0:03
Mar-02	4:22	37	0:07
Apr-02	1:20	20	0:04
May-02	7:59	17	0:28
Jun-02	1:01	17	0:04



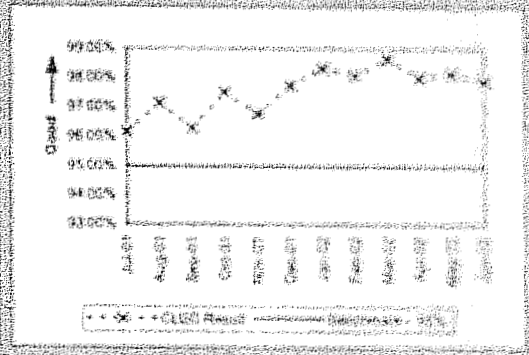
Coordinated Cuts Completed on Time (Percent) Unbundled Loop - Analog (OP-13A) (Benchmark)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	4300	4342	99.03%
Aug-01	4434	4477	99.04%
Sep-01	4415	4462	98.95%
Oct-01	7401	7447	99.38%
Nov-01	5889	5925	99.39%
Dec-01	6173	6248	98.80%
Jan-02	4270	4304	99.21%
Feb-02	3332	3349	99.49%
Mar-02	2871	2895	99.17%
Apr-02	4099	4119	99.51%
May-02	3477	3490	99.63%
Jun-02	2451	2470	99.23%



Coordinated Cuts Completed on Time (Percent) Unbundled Loop Other (OP-13A) (Benchmark)

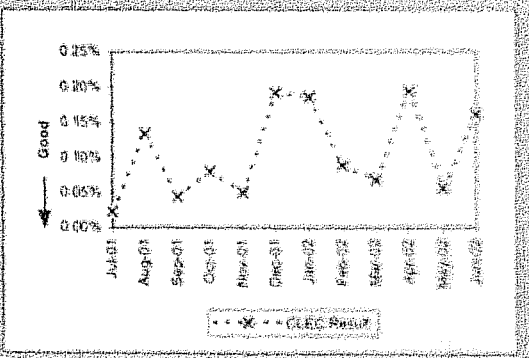
Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	1530	1591	96.17%
Aug-01	2354	2423	97.15%
Sep-01	1878	1950	96.31%
Oct-01	1845	1892	97.52%
Nov-01	1171	1210	96.78%
Dec-01	1177	1204	97.76%
Jan-02	1194	1214	98.35%
Feb-02	976	995	98.09%
Mar-02	971	984	98.68%
Apr-02	937	956	98.01%
May-02	1016	1035	98.16%
Jun-02	840	858	97.90%



Checklist #4 - Unbundled Loop Cutovers

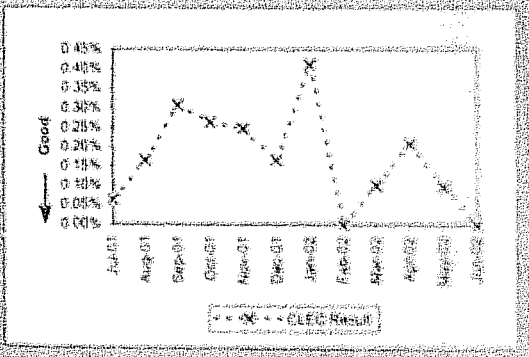
Coordinated Cuts Started Without CLEC Approval (Percent) Unbundled Loop - Analog (OP-13B) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	1	4342	0.02%
Aug-01	6	4477	0.13%
Sep-01	2	4462	0.04%
Oct-01	6	7447	0.08%
Nov-01	3	5925	0.05%
Dec-01	12	6248	0.19%
Jan-02	8	4304	0.19%
Feb-02	3	3349	0.09%
Mar-02	2	2895	0.07%
Apr-02	8	4119	0.19%
May-02	2	3490	0.06%
Jun-02	4	2470	0.16%



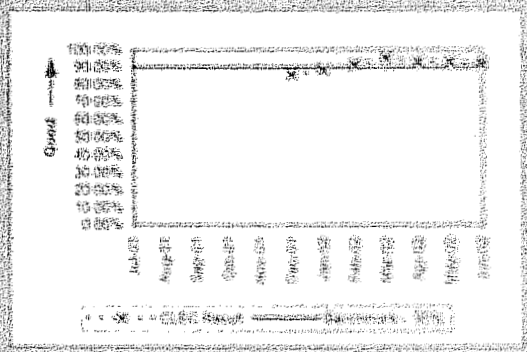
Coordinated Cuts Started Without CLEC Approval (Percent) Unbundled Loop Other (OP-13B) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result
Jul-01	1	1591	0.06%
Aug-01	4	2423	0.17%
Sep-01	6	1950	0.31%
Oct-01	5	1892	0.26%
Nov-01	3	1210	0.25%
Dec-01	2	1204	0.17%
Jan-02	5	1214	0.41%
Feb-02	0	995	0.00%
Mar-02	1	984	0.10%
Apr-02	2	956	0.21%
May-02	1	1035	0.10%
Jun-02	0	858	0.00%

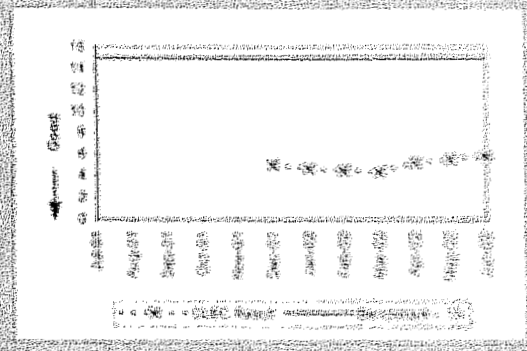


Checklist #4 - Unbundled Loop - Conditioned

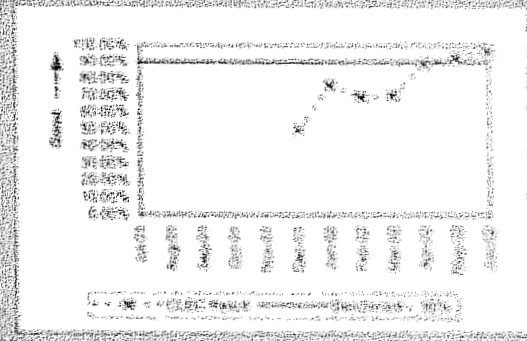
Installation Commitments Met (Percent) (OP-3D) (Benchmark)-- Interval Zone One				
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01				
Dec-01	762	887	85.91%	34.79%
Jan-02	1021	1147	89.01%	31.27%
Feb-02	716	781	91.68%	27.62%
Mar-02	689	721	95.56%	20.59%
Apr-02	680	728	93.41%	24.82%
May-02	629	673	93.46%	24.72%
Jun-02	584	634	92.11%	26.95%



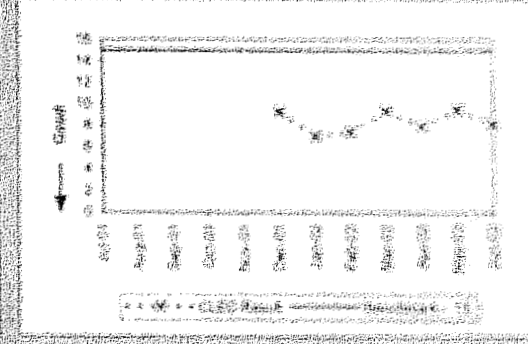
Installation Interval (Average Days) (OP-4D) (Benchmark)-- Interval Zone One				
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01				
Dec-01	2635	529	4.98	3.72
Jan-02	4904	1050	4.67	4.15
Feb-02	3402	753	4.52	3.47
Mar-02	3065	703	4.36	3.33
Apr-02	3717	709	5.24	3.99
May-02	3599	643	5.60	3.78
Jun-02	3627	628	5.85	5.83



Installation Commitments Met (Percent) (OP-3E) (Benchmark)-- Interval Zone Two				
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01				
Dec-01	19	38	50.00%	50.02%
Jan-02	42	55	76.36%	42.48%
Feb-02	48	69	69.57%	46.01%
Mar-02	50	71	70.42%	45.64%
Apr-02	67	75	89.33%	30.87%
May-02	66	71	92.96%	25.59%
Jun-02	58	60	96.67%	17.95%



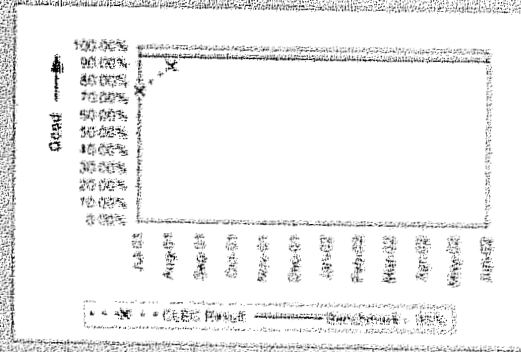
Installation Interval (Average Days) (OP-4E) (Benchmark)-- Interval Zone Two				
Date	CLEC Num	CLEC Denom	CLEC Result	CLEC Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01				
Dec-01	261	28	9.32	5.37
Jan-02	260	37	7.03	5.30
Feb-02	336	45	7.47	6.06
Mar-02	461	49	9.41	7.54
Apr-02	486	61	7.97	4.92
May-02	590	62	9.52	11.46
Jun-02	427	52	8.21	3.82



Checklist #4 - Line Sharing Installation

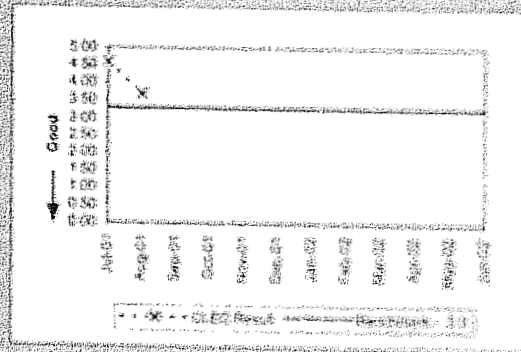
Installation Commitments Met (Percent) (OP-3A) (Benchmark)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	15	20	75.00%	43.30%
Aug-01	17	19	89.47%	30.69%
Sep-01				
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



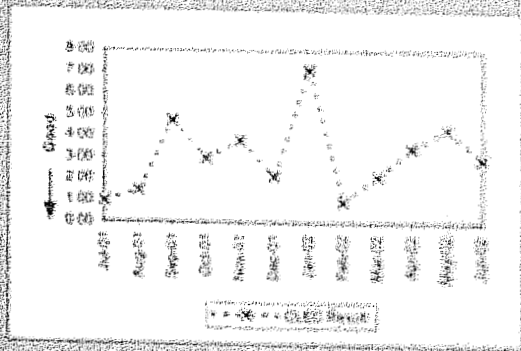
Installation Interval (Average Days) (OP-4A) (Benchmark)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	92	20	4.60	2.91
Aug-01	74	20	3.70	1.03
Sep-01				
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



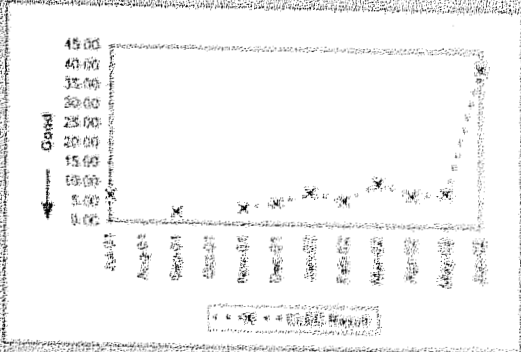
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-1) (Diagnostic)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	3	3	1.00	0.00
Aug-01	3	2	1.50	0.71
Sep-01	19	4	4.75	3.30
Oct-01	3	1	3.00	
Nov-01	23	6	3.83	3.49
Dec-01	13	6	2.17	2.04
Jan-02	107	15	7.13	7.20
Feb-02	5	5	1.00	0.00
Mar-02	24	11	2.18	1.40
Apr-02	28	8	3.50	3.07
May-02	35	8	4.38	6.25
Jun-02	30	10	3.00	4.94



Delayed Days for Facility Reasons (Average Days) (OP-6B-1) (Diagnostic)-- Dispatches Within MSAs

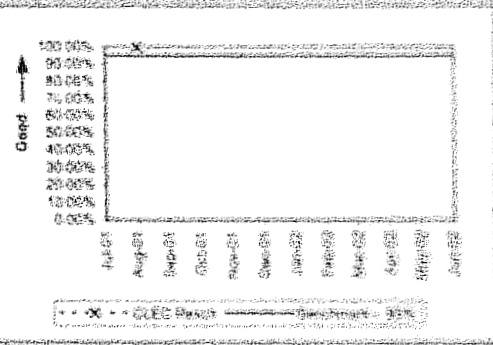
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	14	2	7.00	4.24
Aug-01				
Sep-01	3	1	3.00	
Oct-01				
Nov-01	59	14	4.21	4.21
Dec-01	98	17	5.76	5.41
Jan-02	143	17	8.41	7.22
Feb-02	13	2	6.50	7.78
Mar-02	11	1	11.00	
Apr-02	56	7	8.00	4.80
May-02	52	6	8.67	4.80
Jun-02	122	3	40.67	53.27



Checklist #4 - Line Sharing Installation

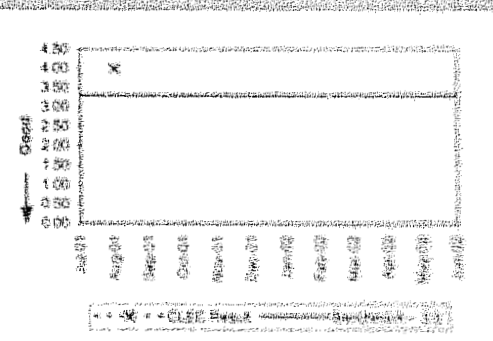
Installation Commitments Met (Percent) (OP-3B) (Benchmark)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01	2	2	100.00%	0.00%
Sep-01				
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



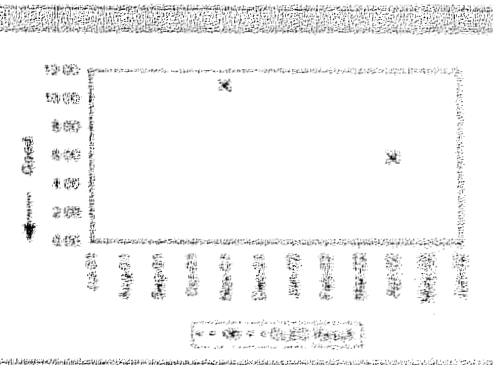
Installation Interval (Average Days) (OP-4B) (Benchmark)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01	8	2	4.00	1.41
Sep-01				
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



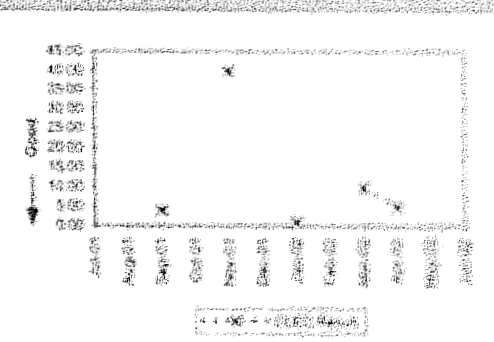
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Diagnostic)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01	11	1	11.00	
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02	6	1	6.00	
May-02				
Jun-02				



Delayed Days for Facility Reasons (Average Days) (OP-6B-2) (Diagnostic)-- Dispatches Outside MSAs

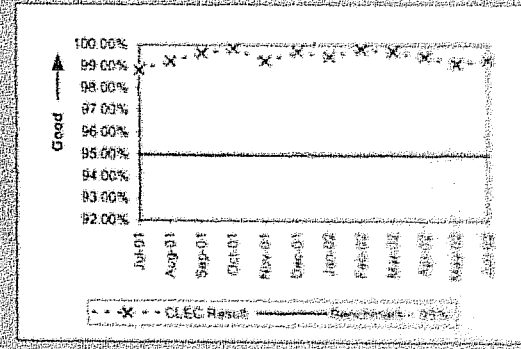
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01	4	1	4.00	
Oct-01				
Nov-01	40	1	40.00	
Dec-01				
Jan-02	1	1	1.00	
Feb-02				
Mar-02	10	1	10.00	
Apr-02	5	1	5.00	
May-02				
Jun-02				



Checklist #4 - Line Sharing Installation

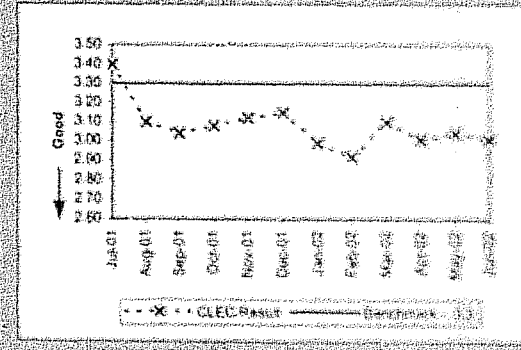
Installation Commitments Met (Percent) (OP-3C) (Benchmark)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	1377	1393	98.85%	10.66%
Aug-01	1322	1332	99.25%	8.63%
Sep-01	1129	1133	99.65%	5.93%
Oct-01	1281	1283	99.84%	3.95%
Nov-01	1089	1097	99.27%	8.51%
Dec-01	1356	1360	99.71%	5.42%
Jan-02	1554	1562	99.49%	7.14%
Feb-02	1186	1188	99.83%	4.10%
Mar-02	1071	1074	99.72%	5.28%
Apr-02	1135	1141	99.47%	7.23%
May-02	1031	1040	99.13%	9.26%
Jun-02	1042	1049	99.33%	8.14%



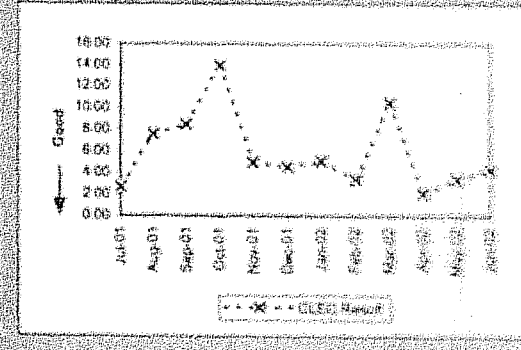
Installation Interval (Average Days) (OP-4C) (Benchmark)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	2219	653	3.40	1.23
Aug-01	2768	894	3.10	1.25
Sep-01	2390	787	3.04	0.51
Oct-01	3315	1077	3.08	0.52
Nov-01	2357	755	3.12	0.71
Dec-01	1869	594	3.15	0.86
Jan-02	4048	1355	2.99	0.77
Feb-02	3099	1060	2.92	0.34
Mar-02	2998	968	3.10	1.68
Apr-02	3137	1042	3.01	0.43
May-02	2745	903	3.04	0.73
Jun-02	2822	937	3.01	0.47



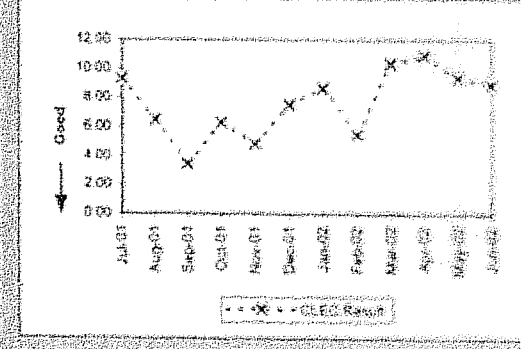
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-3) (Diagnostic)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	27	10	2.70	1.57
Aug-01	53	7	7.57	8.64
Sep-01	34	4	8.50	15.67
Oct-01	42	3	14.00	13.23
Nov-01	55	11	5.00	7.69
Dec-01	92	20	4.60	4.44
Jan-02	102	20	5.10	4.36
Feb-02	24	7	3.43	3.95
Mar-02	21	2	10.50	9.19
Apr-02	13	6	2.17	1.17
May-02	31	9	3.44	2.70
Jun-02	35	8	4.38	2.88



Delayed Days for Facility Reasons (Average Days) (OP-6B-3) (Diagnostic)-- No Dispatches

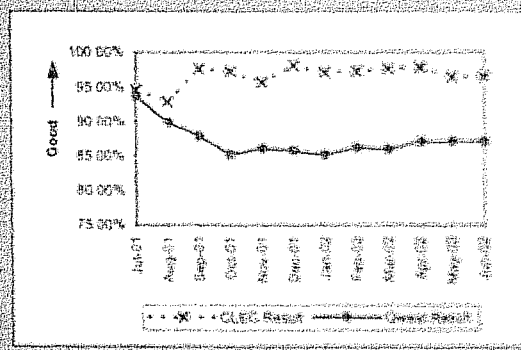
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	56	6	9.33	8.43
Aug-01	26	4	6.50	5.00
Sep-01	7	2	3.50	0.71
Oct-01	57	9	6.33	2.35
Nov-01	380	78	4.87	3.90
Dec-01	498	66	7.55	6.48
Jan-02	563	65	8.66	6.86
Feb-02	111	20	5.55	3.91
Mar-02	83	8	10.38	11.83
Apr-02	296	27	10.96	2.72
May-02	216	23	9.39	4.72
Jun-02	260	29	8.97	3.81



Checklist #4 - Line Sharing Installation

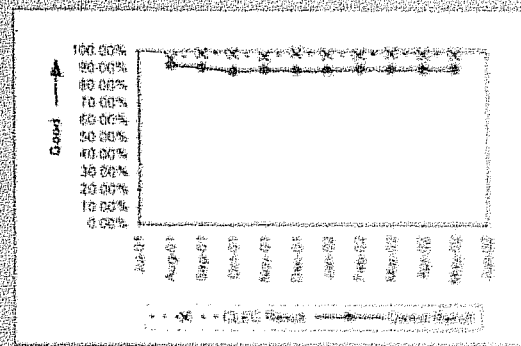
New Service Installation Quality (Percent) (OP-5) (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	1315	1389	94.67%	22.46%	762605	812844	93.82%	-1.32	-1.8
Aug-01	1287	1384	92.99%	25.53%	491277	545987	89.98%	-3.73	-3.27
Sep-01	1235	1264	97.71%	14.97%	313188	356286	87.90%	-10.67	-7.49
Oct-01	1234	1268	97.32%	16.15%	272655	319858	85.24%	-12.1	-8.36
Nov-01	1420	1484	95.69%	20.31%	264829	307780	86.04%	-10.69	-7.5
Dec-01	1855	1889	98.20%	13.29%	230809	268981	85.81%	-15.38	-10.35
Jan-02	2337	2405	97.17%	16.58%	224878	264042	85.17%	-16.49	-11.02
Feb-02	2196	2256	97.34%	16.09%	228814	265128	86.30%	-15.18	-10.23
Mar-02	1763	1805	97.67%	15.08%	223975	260522	85.97%	-14.27	-9.67
Apr-02	1717	1754	97.89%	14.37%	235194	269913	87.14%	-13.41	-9.15
May-02	1622	1682	96.43%	18.55%	245039	281325	87.10%	-11.38	-7.92
Jun-02	1528	1583	96.53%	18.31%	248464	285075	87.16%	-11.11	-7.75



New Service Installation Quality (Percent) (OP-5*) (Parity)

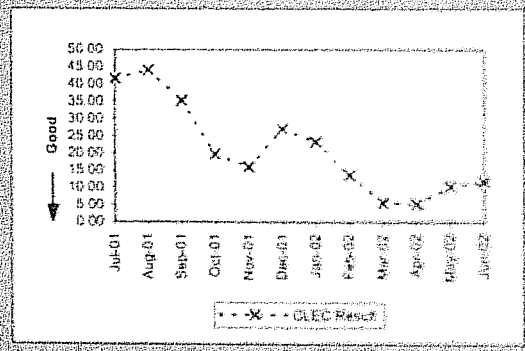
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	1327	1384	95.88%	19.87%	502621	545987	92.06%	-5.25	-4.19
Sep-01	1246	1264	98.73%	11.18%	321988	356286	90.37%	-10.06	-7.02
Oct-01	1253	1268	98.82%	10.81%	283195	319858	88.54%	-11.47	-7.97
Nov-01	1442	1484	97.17%	16.58%	274419	307780	89.16%	-9.9	-7.02
Dec-01	1874	1889	99.21%	8.86%	239584	268981	89.07%	-14.07	-9.55
Jan-02	2364	2405	98.30%	12.95%	234394	264042	88.77%	-14.73	-9.95
Feb-02	2212	2256	98.05%	13.83%	237961	265128	89.75%	-12.94	-8.87
Mar-02	1782	1805	98.73%	11.22%	232566	260522	89.27%	-12.94	-8.86
Apr-02	1729	1754	98.57%	11.85%	242059	269913	89.68%	-12.21	-8.42
May-02	1651	1682	98.16%	13.45%	251815	281325	89.51%	-11.64	-8.01
Jun-02									



Checklist #4 - Line Sharing Installation

Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

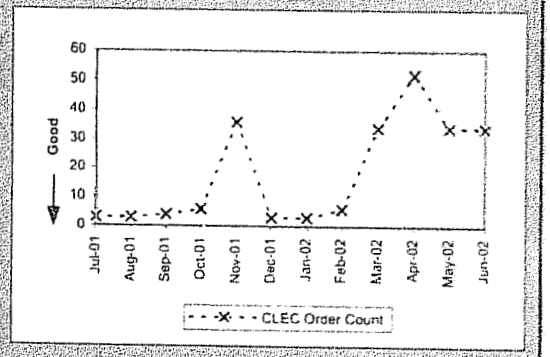
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	292	7	41.71	54.05
Aug-01	397	9	44.11	58.12
Sep-01	529	15	35.27	52.56
Oct-01	376	19	19.79	40.33
Nov-01	849	53	16.02	29.08
Dec-01	326	12	27.17	33.38
Jan-02	211	9	23.44	47.82
Feb-02	123	9	13.67	17.39
Mar-02	212	38	5.58	11.82
Apr-02	307	58	5.29	12.83
May-02	447	43	10.40	32.93
Jun-02	482	41	11.76	37.79



Checklist #4 - Line Sharing Installation

Number of Pending Orders Delayed for Facilities Reasons Line Sharing (OP-15B) (Diagnostic)

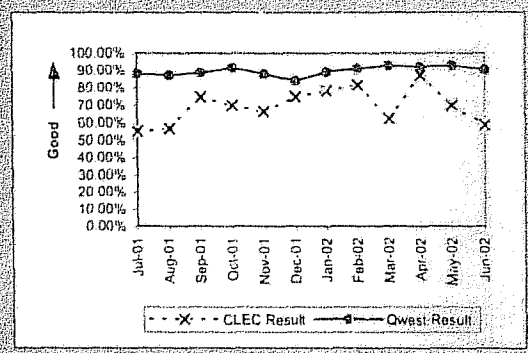
State	CLEC Order Count
[illegible]	3
[illegible]	3
[illegible]	4
[illegible]	6
[illegible]	36
[illegible]	3
[illegible]	3
[illegible]	6
[illegible]	34
[illegible]	52
[illegible]	34
[illegible]	34



Checklist #4 - Line Sharing Repair

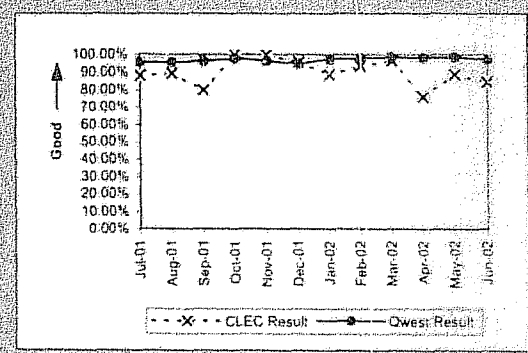
Percent Within SA Intervals (Percent) (MR-3A) (Parity) -- Dispatches Within MSAs

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				125475	127723	98.09%	2.38	0.45
				112632	128820	87.43%	1.94	0.18
				86886	97653	88.97%	0.77	-0.53
				86674	94407	91.74%	1.96	0.19
				76893	87269	88.11%	1.93	0.17
				68465	81247	84.27%	0.7	-0.57
				64664	72305	89.43%	1.2	-0.27
				56170	61484	91.36%	1.02	-0.38
				61763	66537	92.83%	2.39	0.45
				67560	73266	92.24%	0.52	-0.68
				72896	78407	92.97%	2.15	0.3
				76974	85152	90.40%	3.4	1.07



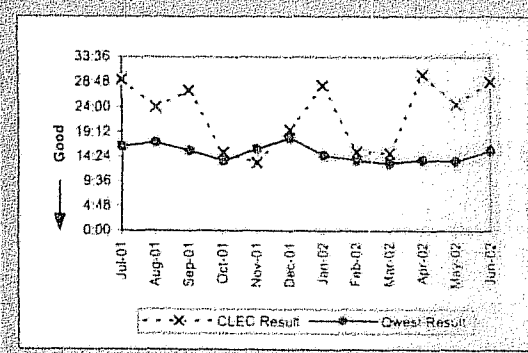
Percent Within SA Intervals (Percent) (MR-4A) (Parity) -- Dispatches Within MSAs

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				162971	170854	95.39%	1.32	-0.2
				167518	175435	95.49%	1.12	-0.32
				129064	133810	96.47%	2.41	0.47
				127808	130646	97.83%	-0.67	-1.41
				117095	121450	96.41%	-1.12	-1.66
				107735	113819	94.62%	-0.22	-1.14
				99455	101537	97.52%	2.77	0.68
				82818	84635	97.92%	1.7	0.03
				88651	90099	98.40%	0.78	-0.53
				96896	100047	96.85%	6.47	2.94
				104541	106177	98.47%	4.04	1.46
				109324	112580	97.11%	4.69	1.85



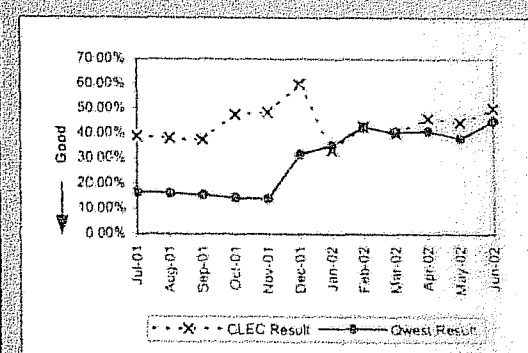
Percent Within SA Intervals (Percent) (MR-4A) (Parity) -- Dispatches Within MSAs

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				[illegible]	170854	16:26	3.72	1.26
				[illegible]	175435	17:14	3.72	1.26
				[illegible]	133810	15:36	3.72	1.26
				[illegible]	130646	13:37	3.09	0.88
				[illegible]	121450	15:56	-0.85	-1.52
				[illegible]	113819	18:03	0.55	-0.66
				[illegible]	101537	14:44	3.09	0.88
				[illegible]	84635	13:45	0.89	-0.46
				[illegible]	90099	13:11	0.91	-0.45
				[illegible]	100047	13:48	2.88	0.75
				[illegible]	106177	13:36	3.72	1.26
				[illegible]	112580	15:41	3.72	1.26



Percent Within SA Intervals (Percent) (MR-7A) (Diagnostic) -- Dispatches Within MSAs

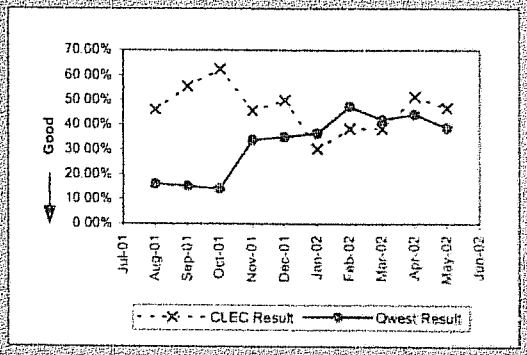
				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				29242	178603	16.37%	2.24	0.36
				29611	182956	16.18%	2.4	0.46
				21376	139015	15.38%	2.14	0.3
				19379	135743	14.28%	3.61	1.19
				17575	125979	13.95%	4.86	1.96
				245	776	31.70%	3.11	0.89
				275	781	35.21%	-0.26	-1.16
				239	561	42.60%	0.04	-0.98
				307	760	40.39%	-0.04	-1.03
				301	750	40.93%	0.7	-0.58
				266	700	38.00%	1	-0.39
				304	677	44.90%	0.86	-0.46



Checklist #4 - Line Sharing Repair

Parity Repair Interval Hours (MR-7A1) (Diagnostic) - Dispatches Within MSAs

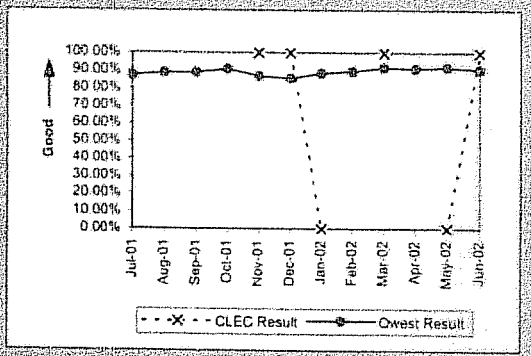
					Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Scr
					26319	163381	16 11%	2 5	0.52
					19302	124486	15.26%	2 71	0 65
					17122	120882	14 16%	3 04	0.85
					204	601	33 94%	1 18	-0 28
					170	485	35 05%	1 27	-0.23
					186	515	36 50%	-0 72	-1 44
					172	363	47 38%	-1 06	-1 64
					198	471	42 04%	-0 36	-1 22
					180	407	44 23%	0 8	-0 51
					145	375	38 67%	1 1	-0 33



Checklist #4 - Line Sharing Repair

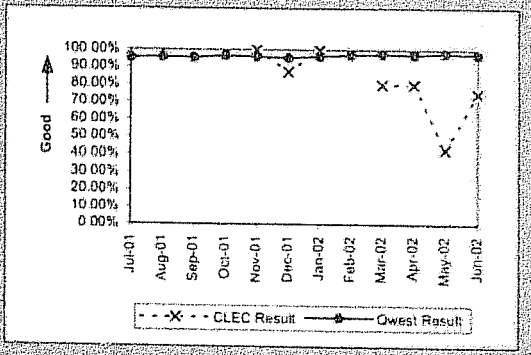
(Parity) - Dispatches Outside MSAs

Qwest Num	Qwest Dem	Qwest Res	Mod Z Scr	Parity Scr
31970	31931	97.41%		
31838	35884	98.84%		
33818	26726	99.02%		
27791	25982	96.87%		
25265	23312	96.92%	-0.39	-1.24
17654	20495	85.66%	-0.58	-1.35
19263	17945	88.40%	1.57	-0.04
14328	15948	89.85%		
16107	17654	91.75%	-0.3	-1.18
23548	27101	91.20%		
20711	21554	91.83%	1.74	0.06
28055	28431	90.64%	-0.72	-1.44



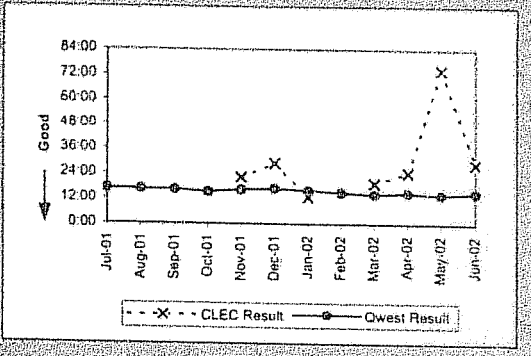
(Parity) - Dispatches Outside MSAs

Qwest Num	Qwest Dem	Qwest Res	Mod Z Scr	Parity Scr
48508	48783	99.34%		
47560	49572	95.88%		
36424	37126	95.96%		
34224	35660	96.58%		
32191	33502	96.09%	-0.45	-1.27
27272	29560	95.44%	0.91	-0.44
25556	26590	96.26%	-0.39	-1.24
22456	22839	97.01%		
24138	24936	97.60%	1.56	-0.05
28812	29479	97.06%	1.45	-0.12
30345	31030	97.79%	4.48	1.72
34176	35089	97.39%	2.37	0.44



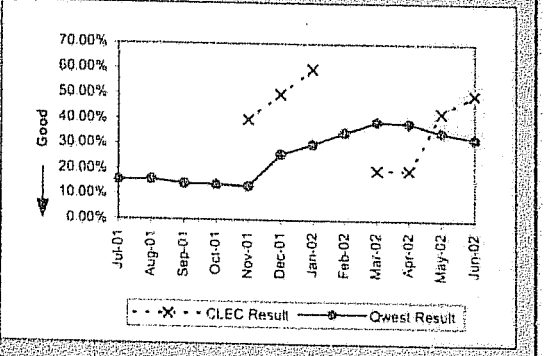
(Parity) - Dispatches Outside MSAs

Qwest Num	Qwest Dem	Qwest Res	Mod Z Scr	Parity Scr
8059.36 42	48783	17.02		
8048.67 58	49572	16.38		
6092.07 68	37126	16.25		
5652.78 48	35660	15.17		
5494.04 52	33502	16.24	3.72	1.26
4086.28 41	29560	13.52	1.65	0.07
4273.59 03	26590	16.05	-0.34	-1.21
3447.36 61	22839	15.06		
3540.16 35	24936	14.14	1.07	-0.35
4373.36 41	29479	14.50	1.55	-0.05
4391.31 55	31030	14.09	3.72	1.26
5214.16 30	35089	14.58	2.26	0.37



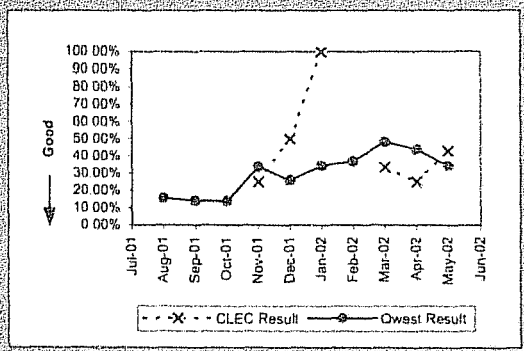
(Parity) - Dispatches Outside MSAs

Qwest Num	Qwest Dem	Qwest Res	Mod Z Scr	Parity Scr
7509	49886	15.77%		
8125	51067	15.91%		
5407	37955	14.25%		
5091	36456	13.96%		
4600	34216	13.44%	1.42	-0.14
29	111	26.13%	1.36	-0.17
35	116	30.17%	1.29	-0.22
31	89	34.83%		
40	102	39.22%	-0.86	-1.52
41	106	38.68%	-0.84	-1.51
36	103	34.95%	0.4	-0.75
26	80	32.50%	0.94	-0.43



Checklist #4 - Line Sharing Repair

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					7035	44882	15.67%		
					4713	33585	14.03%		
					4451	32149	13.84%		
					28	83	33.73%	-0.36	-1.22
					20	77	25.97%	0.61	-0.63
					21	61	34.43%	0.94	-0.43
					21	57	36.84%		
					27	56	48.21%	-0.5	-1.31
					25	57	43.86%	-0.73	-1.45
					12	35	34.29%	0.38	-0.77



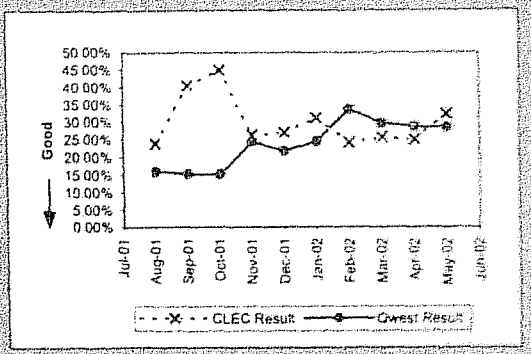
Checklist #4 - Line Sharing Repair

(MR-3) (Parity) - No Dispatches

| | | |

Checklist #4 - Line Sharing Repair

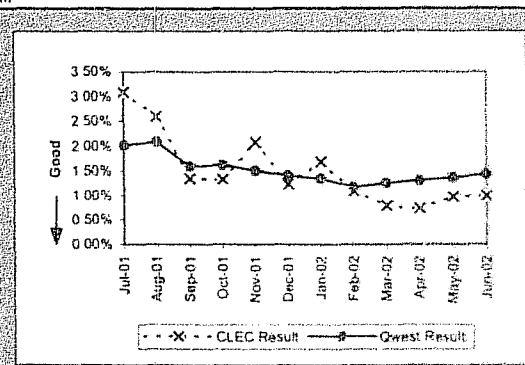
Repair Repeat Report Rate (Percent) (MR-7C*) (Diagnostic)– No Dispatches



Checklist #4 - Line Sharing Repair

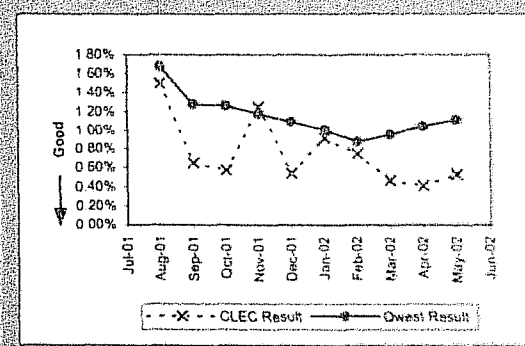
Trouble Rate (Percent) (MR-8) (Parity)

	CLEC Num	CLEC Den	CLEC Rest	Std Dev	Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Scr
[illegible]	183	5893	3 09%	17 30%	291648	14395514	2 03%	5 79	2.52
[illegible]	199	7266	2 60%	15 92%	299080	14314198	2.09%	3 05	0 85
[illegible]	106	7839	1 35%	11 55%	226220	14285037	1 60%	-1 73	-2.05
[illegible]	112	8378	1 34%	11 48%	231495	14244813	1 63%	-2 09	-2.27
[illegible]	198	9508	2 08%	14 28%	214295	14182796	1 51%	4 57	1 78
[illegible]	130	10507	1.24%	11 05%	199069	14128582	1 41%	-1 49	-1 91
[illegible]	264	12083	1 69%	12 88%	189273	14064648	1 35%	3 27	0 99
[illegible]	154	13965	1 10%	10 44%	165159	13985013	1 18%	-0 87	-1 53
[illegible]	116	14589	0 80%	8 68%	176140	13955969	1 26%	-5 05	-4 07
[illegible]	116	15738	0 74%	8 55%	181384	13871941	1 31%	-6 3	-4 83
[illegible]	181	18448	0 98%	9 85%	188805	13793902	1 37%	-4 3	-3 61
[illegible]	137	17282	1 00%	9 94%	196493	13708111	1.43%	-4 82	-3 93



Trouble Rate (Percent) (MR-8*) (Parity)

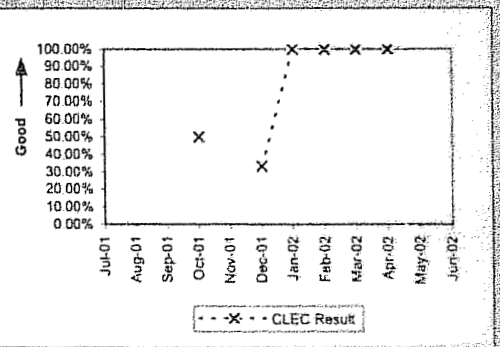
	CLEC Num	CLEC Den	CLEC Rest	Std Dev	Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Scr
[illegible]									
[illegible]	109	7266	1 50%	12 16%	240226	14314198	1.68%	-1.18	-1.72
[illegible]	53	7839	0 65%	8 04%	182627	14285037	1 28%	-4 95	-4 01
[illegible]	48	8378	0 57%	7 55%	179850	14244813	1 26%	-5 65	-4 44
[illegible]	119	9508	1 25%	11 12%	167097	14182796	1 18%	0 66	-0.6
[illegible]	57	10507	0 54%	7 35%	154052	14128582	1 09%	-5.41	-4 29
[illegible]	141	12083	0 [illegible]%	9 54%	141952	14064648	1.01%	-1	-1.61
[illegible]	105	13965	0 75%	8 63%	122709	13985013	0 88%	-1.6	-1.96
[illegible]	66	14589	0 47%	6 81%	133612	13955969	0.96%	-6 09	-4.7
[illegible]	65	15738	0 41%	6 41%	144594	13871941	1 04%	-7 77	-5.72
[illegible]	97	18448	0 53%	7 25%	153860	13793902	1 12%	-7.16	-5.35
[illegible]									



Checklist #4 - Sub-Loop Unbundling Installation

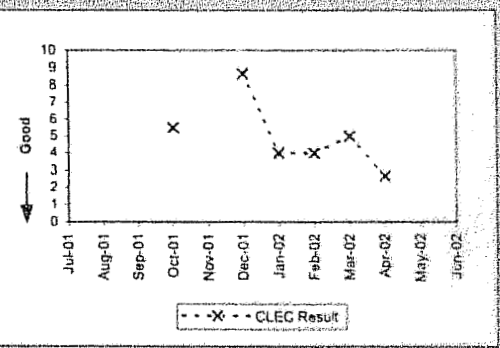
Installation Commitments Met (Percent) (OP-3A) (Diagnostic)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01	2	4	50.00%	50.00%
Nov-01				
Dec-01	1	3	33.33%	47.14%
Jan-02	1	1	100.00%	0.00%
Feb-02	1	1	100.00%	0.00%
Mar-02	2	2	100.00%	0.00%
Apr-02	3	3	100.00%	0.00%
May-02				
Jun-02				



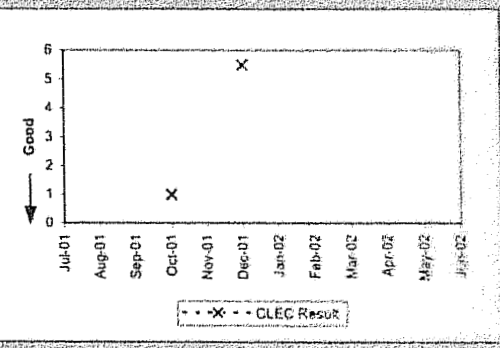
Installation Interval (Average Days) (OP-4A) (Diagnostic)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01	22	4	5.50	0.58
Nov-01				
Dec-01	26	3	8.67	3.21
Jan-02	4	1	4.00	
Feb-02	4	1	4.00	
Mar-02	10	2	5.00	0.00
Apr-02	8	3	2.67	2.08
May-02				
Jun-02				



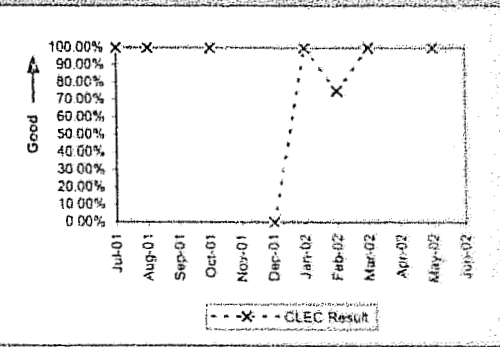
Service Outages for Non-Facility Reasons (Average Days) (OP-6A-1) (Diagnostic)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01	2	2	1.00	0.00
Nov-01				
Dec-01	11	2	5.50	0.71
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



Installation Commitments Met (Percent) (OP-3B) (Diagnostic)-- Dispatches Outside MSAs

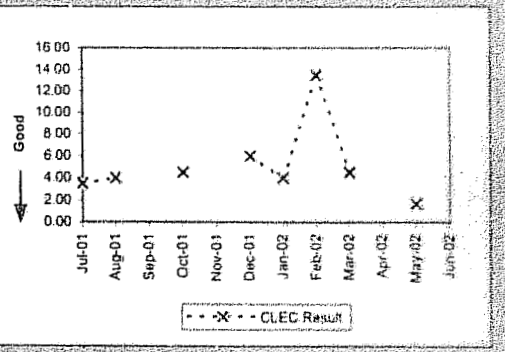
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	4	4	100.00%	0.00%
Aug-01	4	4	100.00%	0.00%
Sep-01				
Oct-01	2	2	100.00%	0.00%
Nov-01				
Dec-01	0	1	0.00%	0.00%
Jan-02	3	3	100.00%	0.00%
Feb-02	3	4	75.00%	43.30%
Mar-02	2	2	100.00%	0.00%
Apr-02				
May-02	13	13	100.00%	0.00%
Jun-02				



Checklist #4 - Sub-Loop Unbundling Installation

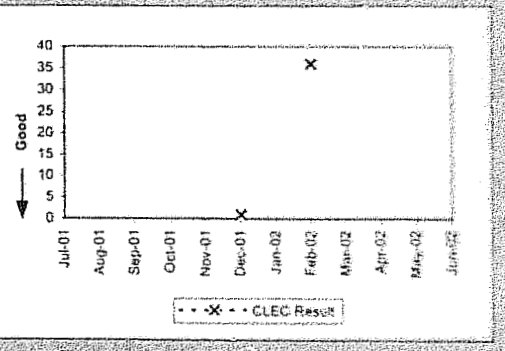
Installation Interval (Average Days) (OP-4B) (Diagnostic)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	14	4	3.50	1.00
Aug-01	16	4	4.00	1.15
Sep-01				
Oct-01	9	2	4.50	0.71
Nov-01				
Dec-01	6	1	6.00	
Jan-02	12	3	4.00	0.00
Feb-02	54	4	13.50	20.34
Mar-02	9	2	4.50	2.12
Apr-02				
May-02	22	13	1.69	0.48
Jun-02				



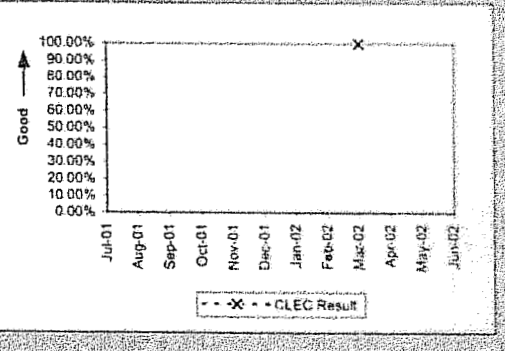
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Diagnostic)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01				
Dec-01	1	1	1.00	
Jan-02				
Feb-02	36	1	36.00	
Mar-02				
Apr-02				
May-02				
Jun-02				



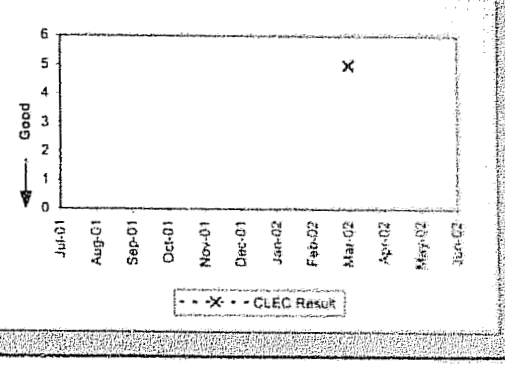
Installation Commitments Met (Percent) (OP-3C) (Diagnostic)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02	1	1	100.00%	0.00%
Apr-02				
May-02				
Jun-02				



Installation Interval (Average Days) (OP-4C) (Diagnostic)-- No Dispatches

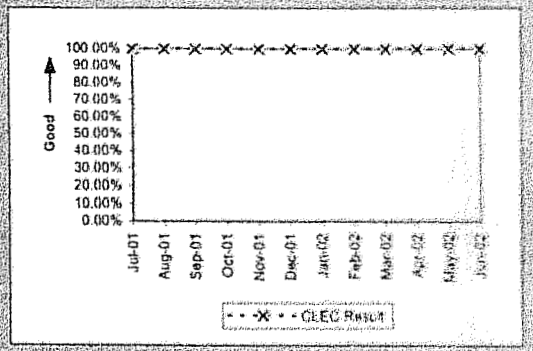
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02	5	1	5.00	
Apr-02				
May-02				
Jun-02				



Checklist #4 - Sub-Loop Unbundling Installation

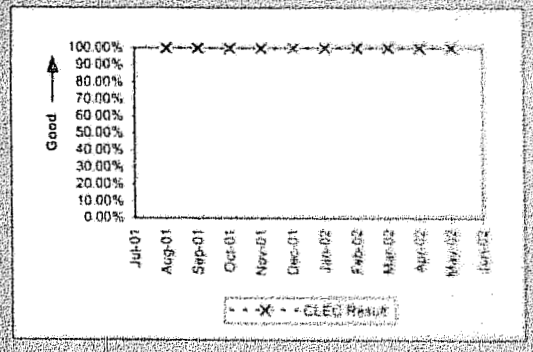
New Service Installation Quality (Percent) (OP-5) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	7	7	100.00%	0.00%
Aug-01	4	4	100.00%	0.00%
Sep-01	2	2	100.00%	0.00%
Oct-01	3	3	100.00%	0.00%
Nov-01	3	3	100.00%	0.00%
Dec-01	2	2	100.00%	0.00%
Jan-02	4	4	100.00%	0.00%
Feb-02	5	5	100.00%	0.00%
Mar-02	5	5	100.00%	0.00%
Apr-02	4	4	100.00%	0.00%
May-02	8	8	100.00%	0.00%
Jun-02	7	7	100.00%	0.00%



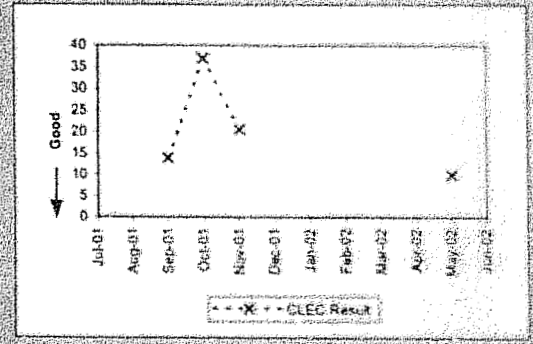
New Service Installation Quality (Percent) (OP-5*) (Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01	4	4	100.00%	0.00%
Sep-01	2	2	100.00%	0.00%
Oct-01	3	3	100.00%	0.00%
Nov-01	3	3	100.00%	0.00%
Dec-01	2	2	100.00%	0.00%
Jan-02	4	4	100.00%	0.00%
Feb-02	5	5	100.00%	0.00%
Mar-02	5	5	100.00%	0.00%
Apr-02	4	4	100.00%	0.00%
May-02	8	8	100.00%	0.00%
Jun-02				



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

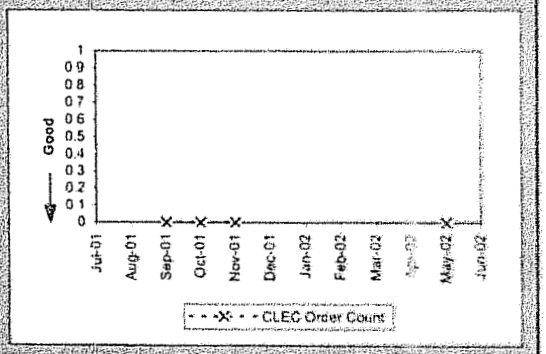
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01	14	1	14.00	
Oct-01	37	1	37.00	
Nov-01	62	3	20.67	32.33
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02	10	1	10.00	
Jun-02				



Checklist #4 - Sub-Loop Unbundling Installation

Count of Pending Orders Delayed for Facilities Reasons Sub-Loop Unbundling (OP-15B) (Diagnostic)

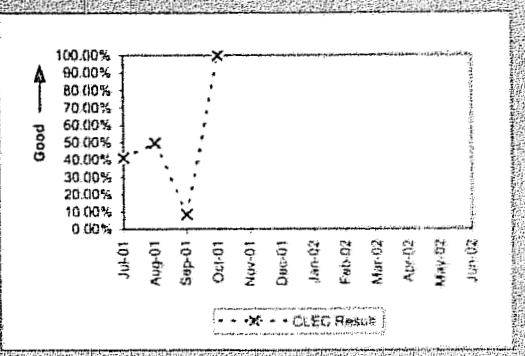
Date	CLEC Order Count
Jul-01	
Aug-01	
Sep-01	0
Oct-01	0
Nov-01	0
Dec-01	
Jan-02	
Feb-02	
Mar-02	
Apr-02	
May-02	0
Jun-02	



Checklist #4 - Dark Fiber - Loop Installation

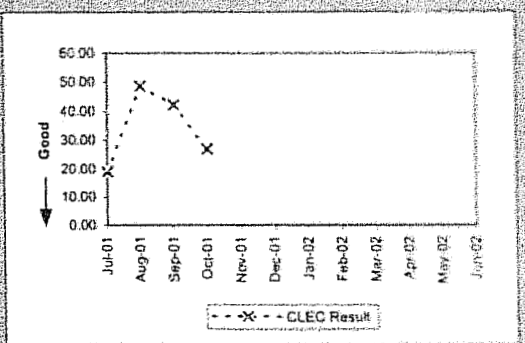
Installation Commitments Met (Percent) (OP-3D) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	12	29	41.38%	49.25%
Aug-01	2	4	50.00%	50.00%
Sep-01	7	80	8.75%	28.26%
Oct-01	4	4	100.00%	0.00%
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



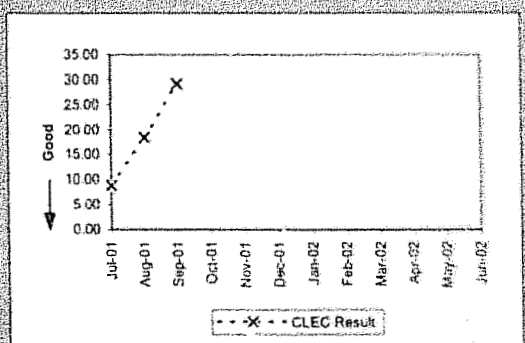
Installation Interval (Average Days) (OP-4D) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	556	29	19.17	5.74
Aug-01	195	4	48.75	39.20
Sep-01	3386	80	42.32	15.20
Oct-01	108	4	27.00	0.00
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



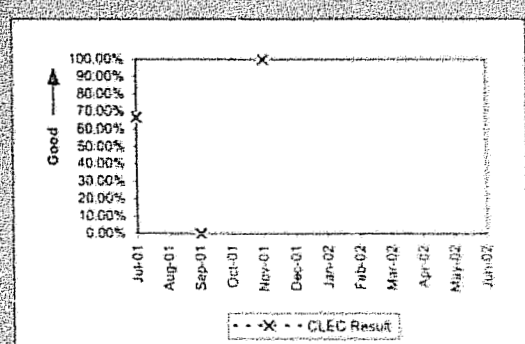
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	151	17	8.88	8.49
Aug-01	37	2	18.50	19.09
Sep-01	2134	73	29.23	10.18
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



Installation Commitments Met (Percent) (OP-3E) (Diagnostic)-- Interval Zone Two

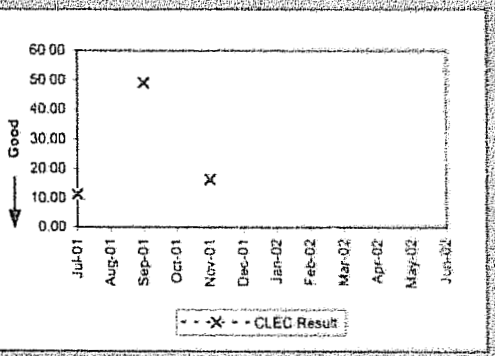
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	2	3	66.67%	47.14%
Aug-01				
Sep-01	0	5	0.00%	0.00%
Oct-01				
Nov-01	4	4	100.00%	0.00%
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



Checklist #4 - Dark Fiber - Loop Installation

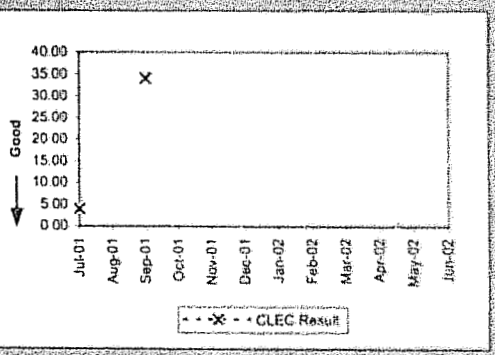
Installation Interval (Average Days) (OP-4E) (Diagnostic)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	34	3	11.33	9.87
Aug-01				
Sep-01	246	5	49.20	1.30
Oct-01				
Nov-01	66	4	16.50	3.00
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Diagnostic)-- Interval Zone Two

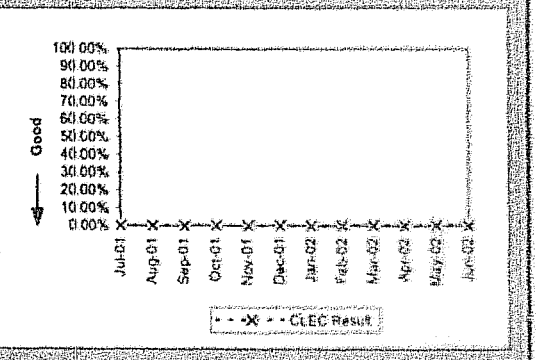
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	4	1	4.00	
Aug-01				
Sep-01	171	5	34.20	3.49
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



Checklist #4 - Dark Fiber - Loop Repair

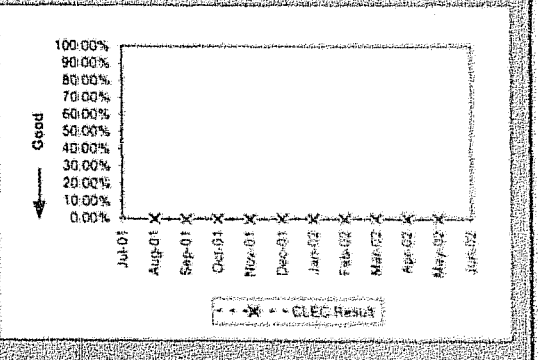
Trouble Rate (Percent) (MR-8) (Diagnostic)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	0	69	0.00%	0.00%
Aug-01	0	73	0.00%	0.00%
Sep-01	0	81	0.00%	0.00%
Oct-01	0	63	0.00%	0.00%
Nov-01	0	66	0.00%	0.00%
Dec-01	0	66	0.00%	0.00%
Jan-02	0	64	0.00%	0.00%
Feb-02	0	68	0.00%	0.00%
Mar-02	0	68	0.00%	0.00%
Apr-02	0	63	0.00%	0.00%
May-02	0	52	0.00%	0.00%
Jun-02	0	49	0.00%	0.00%



Trouble Rate (Percent) (MR-8*) (Diagnostic)-- Interval Zone One and Two

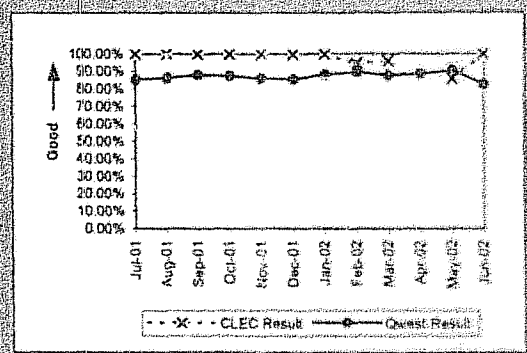
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01	0	73	0.00%	0.00%
Sep-01	0	81	0.00%	0.00%
Oct-01	0	63	0.00%	0.00%
Nov-01	0	66	0.00%	0.00%
Dec-01	0	66	0.00%	0.00%
Jan-02	0	64	0.00%	0.00%
Feb-02	0	68	0.00%	0.00%
Mar-02	0	68	0.00%	0.00%
Apr-02	0	63	0.00%	0.00%
May-02	0	52	0.00%	0.00%
Jun-02				



Checklist #5 - Unbundled Transport (UDIT) DS1 Level Installation

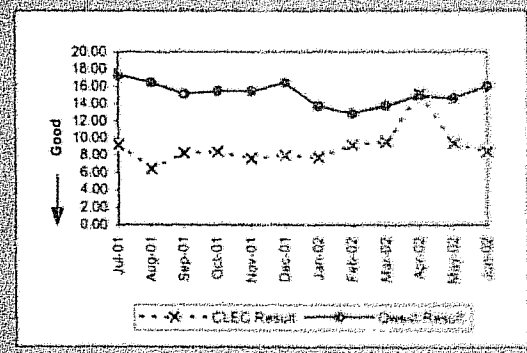
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	24	24	100.00%	0.00%	2516	2945	85.43%	-2.01	-2.22
Aug-01	25	25	100.00%	0.00%	2963	3432	86.33%	-1.98	-2.21
Sep-01	26	26	100.00%	0.00%	2862	3251	88.03%	-1.87	-2.14
Oct-01	6	6	100.00%	0.00%	3120	3571	87.37%	-0.93	-1.57
Nov-01	6	6	100.00%	0.00%	2809	3258	86.22%	-0.98	-1.59
Dec-01	13	13	100.00%	0.00%	2616	3056	85.60%	-1.48	-1.9
Jan-02	17	17	100.00%	0.00%	3415	3867	88.31%	-1.5	-1.91
Feb-02	34	36	94.44%	22.91%	3238	3613	89.62%	-0.94	-1.57
Mar-02	25	26	96.15%	19.23%	2771	3159	87.72%	-1.31	-1.79
Apr-02					3104	3505	88.56%		
May-02	12	14	85.71%	34.99%	3284	3627	90.54%	0.63	-0.62
Jun-02	2	2	100.00%	0.00%	2895	3495	82.86%	-0.64	-1.39



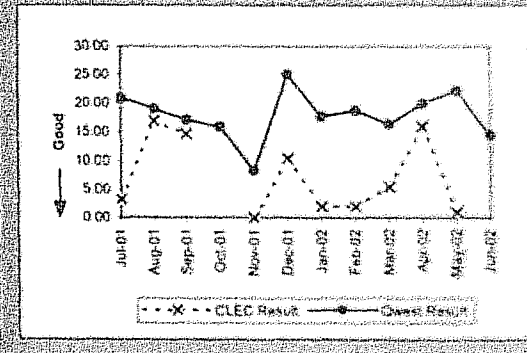
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	831	90	9.23	3.44	73506	4244	17.32	-4.39	-3.67
Aug-01	269	41	6.44	4.28	76695	4664	16.44	-3.87	-3.35
Sep-01	462	56	8.25	6.12	66905	4418	15.14	-3.74	-3.27
Oct-01	160	19	8.42	3.39	79727	5160	15.45	-2.11	-2.28
Nov-01	130	17	7.65	3.35	68216	4413	15.46	-2.27	-2.38
Dec-01	606	76	7.97	3.09	63510	3867	16.42	-4.09	-3.49
Jan-02	379	49	7.73	1.92	64286	4698	13.68	-3.45	-3.1
Feb-02	621	69	9.22	4.88	55946	4360	12.83	-3	-2.82
Mar-02	439	46	9.54	8.16	52335	3803	13.76	-1.74	-2.06
Apr-02	816	54	15.11	7.26	65915	4425	14.90	0.21	-0.87
May-02	1156	123	9.40	9.64	67058	4575	14.66	-3.63	-3.21
Jun-02	756	90	8.40	1.04	72319	4518	16.01	-6.08	-4.7



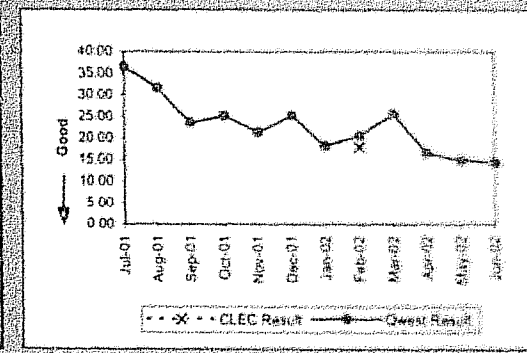
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	40	12	3.33	8.34	17222	821	20.98	-2.87	-2.74
Aug-01	17	1	17.00		15908	834	19.07	-0.09	-1.05
Sep-01	44	3	14.67	20.43	12179	711	17.13	-0.21	-1.13
Oct-01					14313	896	15.97		
Nov-01	0	11	0.00	0.00	13363	1598	8.36	-1.67	-2.01
Dec-01	21	2	10.50	4.95	14668	586	25.03	-0.53	-1.32
Jan-02	2	1	2.00		10385	587	17.69	-0.79	-1.48
Feb-02	2	1	2.00		8683	461	18.84	-0.81	-1.49
Mar-02	182	33	5.52	1.86	7991	488	16.38	-1.62	-1.96
Apr-02	432	27	16.00	0.00	10616	531	19.99	-0.86	-1.52
May-02	2	2	1.00	0.00	10826	487	22.23	-0.8	-1.49
Jun-02					10785	739	14.59		



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

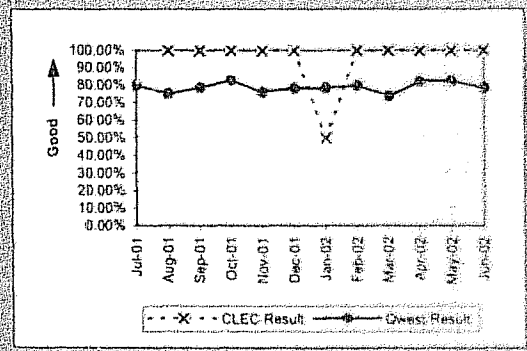
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01					5108	140	36.49		
Aug-01					4147	131	31.65		
Sep-01					2230	95	23.47		
Oct-01					2744	109	25.17		
Nov-01					2965	139	21.33		
Dec-01					2495	99	25.20		
Jan-02					1634	90	18.16		
Feb-02	36	2	18.00	24.04	700	34	20.59	-0.21	-1.13
Mar-02					1175	46	25.54		
Apr-02					792	48	16.50		
May-02					792	53	14.94		
Jun-02					939	65	14.45		



Checklist #5 - Unbundled Transport (UDIT) DS1 Level Installation

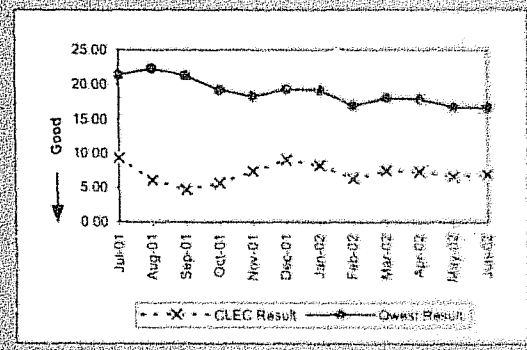
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01					1317	1651	79.77%		
Aug-01	16	16	100.00%	0.00%	1226	1634	75.03%	-2.3	-2.4
Sep-01	27	27	100.00%	0.00%	1135	1445	78.55%	-2.69	-2.64
Oct-01	10	10	100.00%	0.00%	1536	1859	82.63%	-1.45	-1.88
Nov-01	1	1	100.00%	0.00%	1517	1994	76.08%	-0.56	-1.34
Dec-01	3	3	100.00%	0.00%	1367	1749	78.16%	-0.91	-1.56
Jan-02	1	2	50.00%	50.00%	1386	1767	78.44%	0.79	-0.52
Feb-02	5	5	100.00%	0.00%	1498	1878	79.77%	-1.12	-1.68
Mar-02	11	11	100.00%	0.00%	1315	1785	73.67%	-1.98	-2.2
Apr-02	1	1	100.00%	0.00%	1646	2000	82.30%	-0.46	-1.28
May-02	4	4	100.00%	0.00%	2038	2472	82.44%	-0.92	-1.56
Jun-02	9	9	100.00%	0.00%	1685	2150	78.37%	-1.57	-1.96



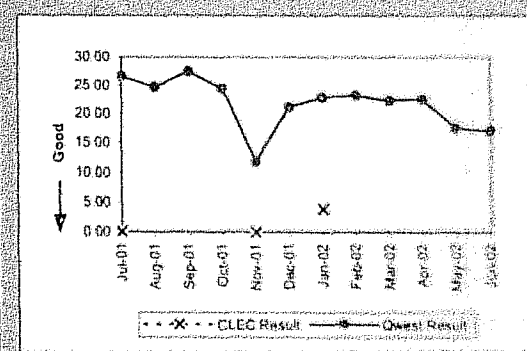
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	47	5	9.40	0.55	52783	2467	21.40	-1.28	-1.78
Aug-01	104	17	6.12	1.73	56572	2537	22.30	-2.82	-2.71
Sep-01	142	30	4.73	2.15	44831	2105	21.30	-3.35	-3.04
Oct-01	80	14	5.71	1.33	50939	2646	19.25	-2.36	-2.44
Nov-01	52	7	7.43	1.99	50135	2732	18.35	-1.61	-1.98
Dec-01	164	18	9.11	2.95	46661	2413	19.34	-2.59	-2.58
Jan-02	50	6	8.33	0.52	45263	2356	19.21	-1.35	-1.82
Feb-02	38	6	6.33	1.86	38339	2258	16.98	-1.5	-1.91
Mar-02	127	17	7.47	1.97	40983	2271	18.05	-2.29	-2.39
Apr-02	37	5	7.40	1.82	46620	2598	17.94	-1.47	-1.9
May-02	60	9	6.67	2.12	52256	3112	16.79	-2.2	-2.34
Jun-02	139	20	6.95	1.61	44380	2663	16.67	-2.86	-2.74



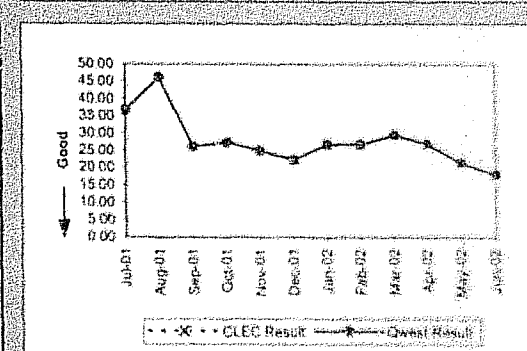
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	0	4	0.00	0.00	16376	617	26.54	-1.99	-2.21
Aug-01					17827	723	24.66		
Sep-01					15360	560	27.43		
Oct-01					15043	615	24.46		
Nov-01	0	6	0.00	0.00	13683	1149	11.91	-1.38	-1.84
Dec-01					10853	513	21.16		
Jan-02	4	1	4.00		11807	515	22.93	-0.76	-1.46
Feb-02					10570	455	23.23		
Mar-02					11876	532	22.32		
Apr-02					10240	453	22.60		
May-02					9620	548	17.55		
Jun-02					9535	558	17.09		



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Score
Jul-01					3457	94	36.78		
Aug-01					5363	116	46.23		
Sep-01					2089	80	26.11		
Oct-01					2297	84	27.35		
Nov-01					2828	113	25.03		
Dec-01					1244	56	22.21		
Jan-02					2171	81	26.80		
Feb-02					1393	52	26.79		
Mar-02					1441	49	29.41		
Apr-02					1132	42	26.95		
May-02					1003	47	21.34		
Jun-02					921	51	18.06		



CONTINUATION

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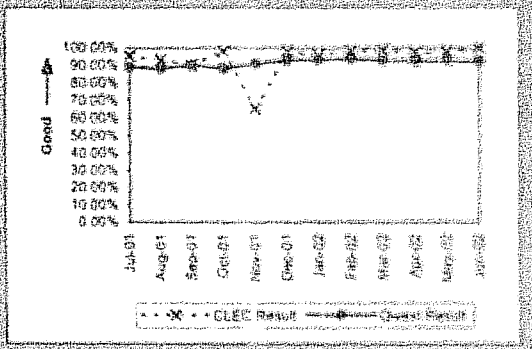
Checklist #5 - Unbundled Transport (UDIT) DS1 Level Installation

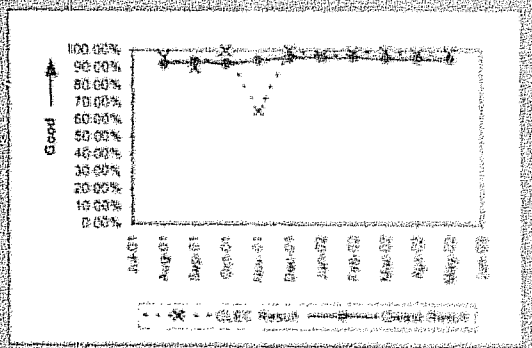
New Service Installation Quality (Percent) (OP-5) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	65	68	95.59%	20.54%	6156	5913	89.05%	-1.72	-2.04
Aug-01	72	77	93.51%	24.64%	6295	7139	88.22%	-1.43	-1.87
Sep-01	65	72	90.28%	29.63%	6394	7080	90.31%	0.06	-0.97
Oct-01	59	60	98.33%	12.80%	6484	7338	88.36%	-2.4	-2.46
Nov-01	19	29	65.52%	47.53%	6937	7648	90.70%	3.72	1.26
Dec-01	58	59	98.31%	12.91%	6450	6933	93.03%	-1.58	1.96
Jan-02	72	75	96.00%	19.60%	6415	6877	93.28%	-0.94	-1.57
Feb-02	74	75	98.67%	11.47%	6539	6975	93.75%	-1.75	-2.06
Mar-02	106	107	99.07%	9.62%	6035	6499	92.88%	-2.47	-2.5
Apr-02	87	89	97.75%	14.82%	6181	6697	92.30%	-1.92	-2.17
May-02	94	96	97.92%	14.28%	6923	7468	92.70%	-1.95	-2.19
Jun-02	121	121	100.00%	0.00%	6975	7556	92.31%	-3.15	-2.91



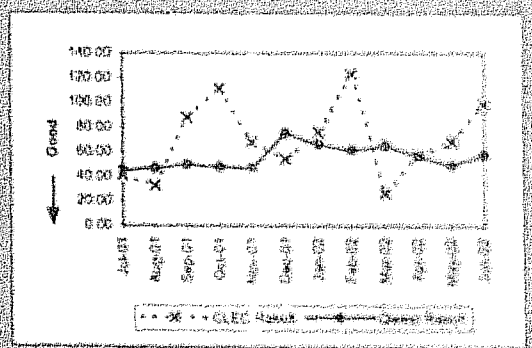
New Service Installation Quality (Percent) (OP-5*) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01									
Aug-01	74	77	96.10%	19.35%	6596	7139	92.39%	-1.22	-1.74
Sep-01	65	72	90.28%	29.63%	6625	7080	93.57%	1.1	-0.33
Oct-01	60	60	100.00%	0.00%	6788	7338	92.50%	-2.2	-2.34
Nov-01	19	29	65.52%	47.53%	7210	7648	94.27%	4.69	1.85
Dec-01	58	59	100.00%	0.00%	6646	6933	95.86%	-1.59	-1.97
Jan-02	73	75	97.33%	16.11%	6598	6877	95.94%	-0.61	-1.37
Feb-02	74	75	98.67%	11.47%	6705	6975	96.13%	-1.13	-1.69
Mar-02	106	107	99.07%	9.62%	6184	6499	95.15%	-1.87	-2.14
Apr-02	87	89	97.75%	14.82%	6363	6697	95.01%	-1.16	-1.72
May-02	94	96	97.92%	14.28%	7090	7468	94.94%	-1.32	-1.8
Jun-02									



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

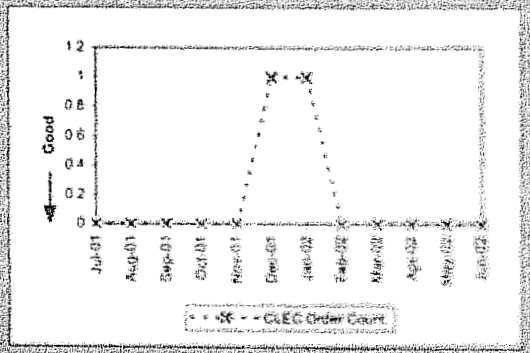
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01	205	5	41.00	49.30	70450	1578	44.65	-0.12	-1.07
Aug-01	56	3	32.67	34.24	71793	1539	46.65	-0.33	-1.2
Sep-01	88	1	88.00		72169	1452	49.70	2.88	0.75
Oct-01	111	1	111.00		69384	1455	47.69	3.72	1.26
Nov-01	136	2	68.00	90.51	73319	1564	46.88	2.65	0.61
Dec-01	162	3	54.00	85.02	61142	815	75.02	-0.33	-1.22
Jan-02	228	3	76.00	85.02	69527	1053	66.03	0.49	-0.1
Feb-02	246	2	123.00	100.41	69117	1132	61.06	1.17	-0.29
Mar-02	792	30	26.40	37.01	67798	1039	65.25	-2.21	-2.34
Apr-02	344	6	57.33	95.40	71610	1265	56.61	0.28	-0.83
May-02	479	7	68.43	91.74	76923	1566	49.12	0.78	-0.53
Jun-02	596	6	99.33	95.40	83701	1447	57.84	1.14	-0.31



Checklist #5 - Unbundled Transport (UDIT) DS1 Level Installation

Count of Pending Orders Delayed for Facilities Reasons UDIT DS1 (OP-15B) (Diagnostic)

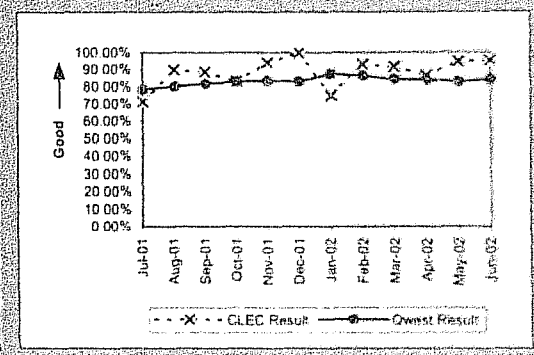
Date	CLEC Order Count
Jul-01	0
Aug-01	0
Sep-01	0
Oct-01	0
Nov-01	0
Dec-01	1
Jan-02	1
Feb-02	0
Mar-02	0
Apr-02	0
May-02	0
Jun-02	0



Checklist #5 - Unbundled Transport (UDIT) DS1 Level Repair

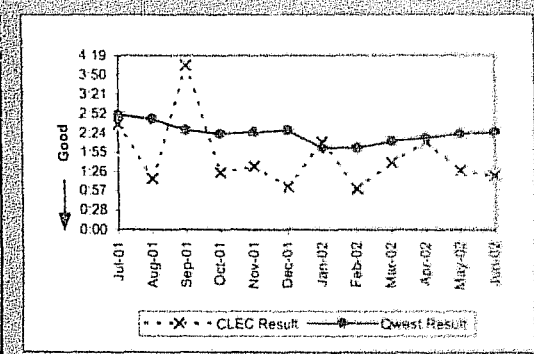
All Trouble Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	5	7	71.43%	45.18%	3988	5078	78.53%	0.47	-0.71
Aug-01	9	10	90.00%	30.00%	4190	5223	80.22%	-0.78	-1.47
Sep-01	8	9	88.89%	31.43%	3571	4369	81.74%	-0.55	-1.34
Oct-01	5	6	83.33%	37.27%	4061	4880	83.22%	-0.01	-1
Nov-01	16	17	94.12%	23.53%	3500	4189	83.55%	-1.17	-1.71
Dec-01	10	10	100.00%	0.00%	2962	3561	83.18%	-1.42	-1.86
Jan-02	6	8	75.00%	43.30%	3341	3826	87.32%	0.96	-0.42
Feb-02	14	15	93.33%	24.94%	2971	3437	86.44%	-0.78	-1.47
Mar-02	11	12	91.67%	27.64%	3055	3631	84.14%	-0.71	-1.43
Apr-02	13	15	86.67%	33.99%	3274	3895	84.06%	-0.28	-1.17
May-02	18	19	94.74%	22.33%	3226	3893	82.87%	-1.37	-1.83
Jun-02	21	22	95.45%	20.83%	3508	4166	84.21%	-1.44	-1.88



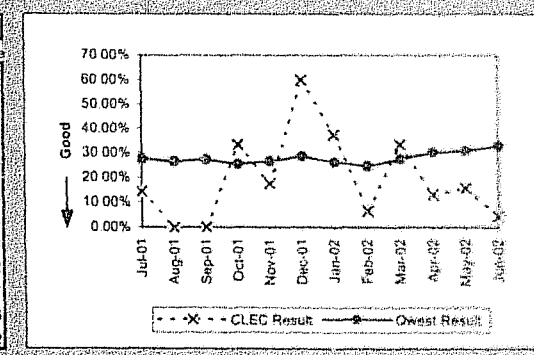
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	18:56	7	2:38	3:22	14491:35	5078	2:51	-0.11	-1.07
Aug-01	12:45	10	1:16	1:37	14353:10	5223	2:45	-0.5	-1.3
Sep-01	36:44	9	4:05	7:27	10835:06	4369	2:29	2.41	0.46
Oct-01	8:30	6	1:25	1:45	11617:03	4880	2:23	-0.66	-1.4
Nov-01	20:42	17	1:34	2:27	10127:22	4189	2:25	-0.97	-1.59
Dec-01	10:34	10	1:03	1:19	8779:36	3561	2:28	-1.09	-1.66
Jan-02	17:05	8	2:11	1:58	7765:14	3826	2:02	0.33	-0.8
Feb-02	15:05	15	1:00	1:18	6974:59	3437	2:02	-1.28	-1.78
Mar-02	19:55	12	1:40	1:36	7961:26	3631	2:12	-0.61	-1.37
Apr-02	30:52	15	2:11	2:00	8893:50	3895	2:17	-0.1	-1.06
May-02	27:54	19	1:28	1:26	9295:13	3893	2:23	-0.95	-1.58
Jun-02	29:28	22	1:20	1:31	10056:02	4166	2:25	-1.58	-1.96



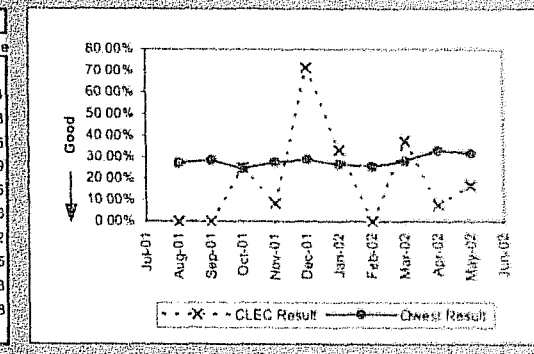
Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01	1	7	14.29%	34.99%	1397	5078	27.51%	-0.78	-1.48
Aug-01	0	10	0.00%	0.00%	1386	5223	26.54%	-1.9	-2.15
Sep-01	0	9	0.00%	0.00%	1192	4369	27.28%	-1.84	-2.12
Oct-01	2	6	33.33%	47.14%	1243	4880	25.47%	0.45	-0.73
Nov-01	3	17	17.65%	38.12%	1118	4189	26.69%	-0.84	-1.51
Dec-01	6	10	60.00%	48.99%	1021	3561	28.67%	2.01	0.22
Jan-02	3	8	37.50%	48.41%	1006	3826	26.29%	0.7	-0.58
Feb-02	1	15	6.67%	24.94%	851	3437	24.76%	-1.62	-1.98
Mar-02	4	12	33.33%	47.14%	996	3631	27.43%	0.47	-0.72
Apr-02	2	15	13.33%	33.99%	1179	3895	30.27%	-1.42	-1.87
May-02	3	19	15.79%	36.46%	1201	3893	30.85%	-1.42	-1.86
Jun-02	1	22	4.55%	20.83%	1371	4166	32.91%	-2.82	-2.72



Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

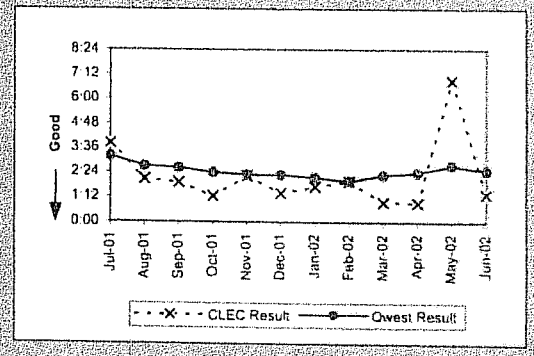
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Score
Jul-01									
Aug-01	0	3	0.00%	0.00%	935	3435	27.22%	-1.06	-1.64
Sep-01	0	8	0.00%	0.00%	813	2865	28.38%	-1.78	-2.08
Oct-01	1	4	25.00%	43.30%	787	3182	24.73%	0.07	-0.96
Nov-01	1	12	8.33%	27.64%	739	2684	27.53%	-1.49	-1.9
Dec-01	5	7	71.43%	45.18%	651	2256	28.86%	2.23	0.35
Jan-02	2	6	33.33%	47.14%	644	2433	26.47%	0.39	-0.76
Feb-02	0	8	0.00%	0.00%	552	2164	25.51%	-1.65	-2
Mar-02	3	8	37.50%	48.41%	675	2401	28.11%	0.58	-0.65
Apr-02	1	13	7.69%	26.65%	876	2649	33.07%	-1.94	-2.18
May-02	2	12	16.67%	37.27%	865	2730	31.69%	-1.12	-1.68
Jun-02									



Checklist #5 - Unbundled Transport (UDIT) DS1 Level Repair

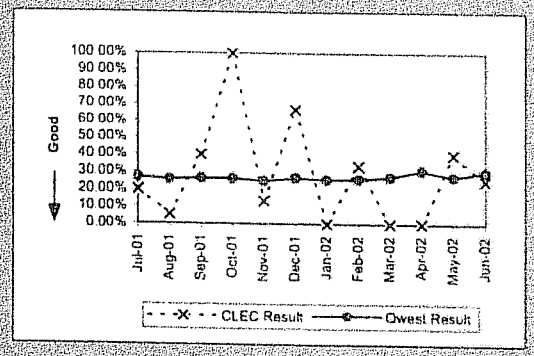
Average Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two

CLEC Num	CLEC Dem	CLEC Result	Std Dev	Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Score
19	19	3:51	4:15	8924:17	2800	3:11	2.46	0.49
97	18	2:55	1:43	7872:43	2899	2:43	-0.68	-1.42
54	5	1:55	1:47	5430:33	2078	2:37	-0.35	-1.21
36	2	1:15	0:00	5384:11	2240	2:24	-0.44	-1.27
333	15	2:14	1:28	4584:21	1993	2:18	-0.06	-1.04
13	3	1:24	0:09	3914:24	1719	2:17	-0.4	-1.25
84	4	1:44	1:44	3726:58	1723	2:10	-0.27	-1.17
5	3	1:59	2:03	3313:54	1668	1:59	0.29	-0.82
105	5	0:58	1:21	4315:22	1888	2:17	-0.73	-1.44
11	7	0:56	1:17	5083:52	2123	2:24	-0.58	-1.35
34	5	6:54	4:59	5995:30	2182	2:45	1.87	0.13
40	5	1:22	0:54	6061:27	2419	2:30	-0.67	-1.41



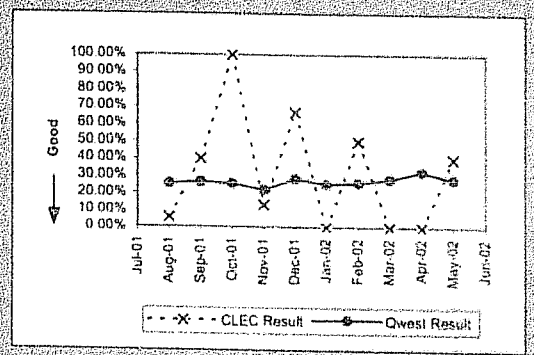
Repeat Repair Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

CLEC Num	CLEC Dem	CLEC Result	Std Dev	Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Score
1	5	20.00%	40.00%	753	2800	26.89%	-0.35	-1.21
1	18	5.56%	22.91%	744	2899	25.66%	-1.95	-2.18
3	5	40.00%	48.99%	550	2078	26.47%	0.65	-0.61
2	2	100.00%	0.00%	587	2240	26.21%	1.83	0.12
5	15	13.33%	33.99%	493	1993	24.74%	-1.02	-1.62
2	3	66.67%	47.14%	458	1719	26.64%	1.31	-0.2
0	4	0.00%	0.00%	440	1723	25.54%	-1.17	-1.71
1	3	33.33%	47.14%	432	1668	25.90%	0.3	-0.82
0	5	0.00%	0.00%	513	1888	27.17%	-1.06	-1.64
0	2	0.00%	0.00%	656	2123	30.90%	-0.95	-1.57
2	5	40.00%	48.99%	595	2182	27.27%	0.61	-0.63
1	4	25.00%	43.30%	725	2419	29.97%	-0.31	-1.19



Repeat Repair Report Rate (Percent) (MR-7E*) (Parity)-- Interval Zone Two

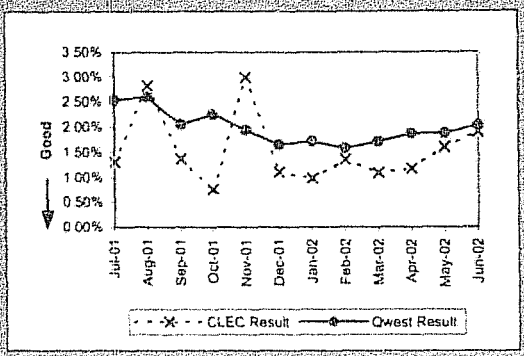
CLEC Num	CLEC Dem	CLEC Result	Std Dev	Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Score
17	5	5.56%	23.53%	481	1882	25.56%	-1.85	-2.13
3	5	40.00%	48.99%	353	1323	26.68%	0.64	-0.61
2	2	100.00%	0.00%	349	1369	25.49%	1.86	0.13
5	15	13.33%	33.99%	262	1191	22.00%	-0.81	-1.49
2	3	66.67%	47.14%	297	1049	28.31%	1.24	-0.24
0	2	0.00%	0.00%	262	1033	25.36%	-0.82	-1.5
2	5	50.00%	50.00%	269	1032	26.07%	0.64	-0.61
0	3	0.00%	0.00%	344	1222	28.15%	-1.08	-1.66
0	1	0.00%	0.00%	467	1431	32.63%	-0.7	-1.42
2	5	40.00%	48.99%	431	1533	28.11%	0.56	-0.66



Checklist #5 - Unbundled Transport (UDIT) DS1 Level Repair

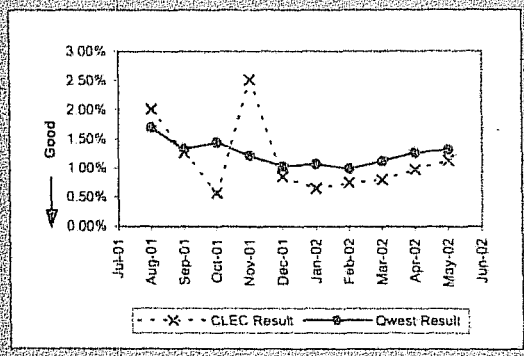
Trouble Rate (Percent) (MR-8) (Parity) -- Interval Zone One and Two

					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Score
					7878	310507	2.54%	-2.35	-2.43
					8122	312764	2.60%	0.45	-0.73
					6447	314738	2.05%	-1.53	-1.93
					7070	315764	2.25%	-3.24	-2.97
					6182	318819	1.94%	2.48	0.51
					5286	320210	1.65%	-1.44	-1.87
					5549	322799	1.72%	-1.97	-2.2
					5105	322985	1.58%	-0.63	-1.38
					5519	322151	1.71%	-1.75	-2.06
					6018	321850	1.87%	-1.9	-2.16
					6075	322674	1.88%	-0.79	-1.46
					6585	325120	2.03%	-0.34	-1.21



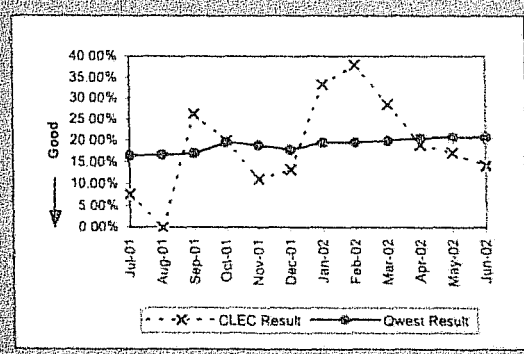
Trouble Rate (Percent) (MR-8) (Parity) -- Interval Zone One and Two

					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Score
					5317	312764	1.70%	0.77	-0.53
					4188	314738	1.33%	-0.17	-1.1
					4551	315764	1.44%	-2.35	-2.43
					3875	318019	1.22%	3.88	1.36
					3305	320210	1.03%	-0.59	-1.36
					3466	322799	1.07%	-1.41	-1.86
					3156	322985	0.99%	-0.85	-1.52
					3623	322151	1.12%	-1.12	-1.68
					4080	321850	1.27%	-0.98	-1.6
					4263	322674	1.32%	-0.62	-1.38



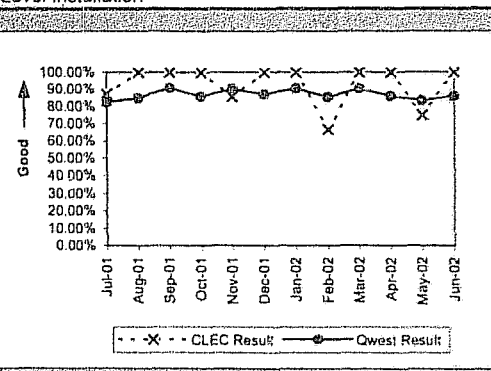
Customer Trouble Report Rate (Percent) (MR-10) (Diagnostic) -- Interval Zone One and Two

					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Score
					1560	9438	16.53%	-0.86	-1.52
					1635	9757	16.76%	-2.37	-2.44
					1321	7768	17.01%	1.04	-0.37
					1740	8860	19.64%	0.09	-0.95
					1436	7618	18.85%	-1.18	-1.72
					1149	6429	17.87%	-0.46	-1.28
					1351	6900	19.58%	1.38	-0.16
					1244	6349	19.59%	2.29	0.39
					1376	6897	19.96%	0.96	-0.42
					1558	7577	20.58%	-0.17	-1.11
					1597	7672	20.82%	-0.47	-1.29
					1727	8312	20.78%	-0.94	-1.57

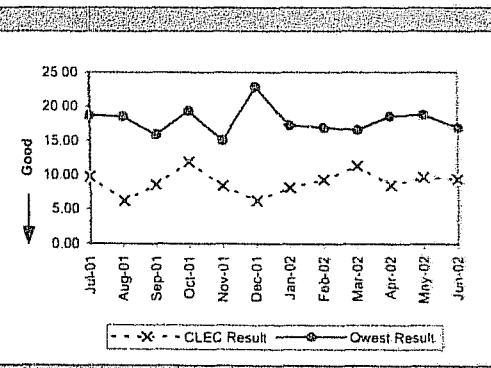


Checklist #5 - Unbundled Transport (UDIT) Above DS1 Level Installation

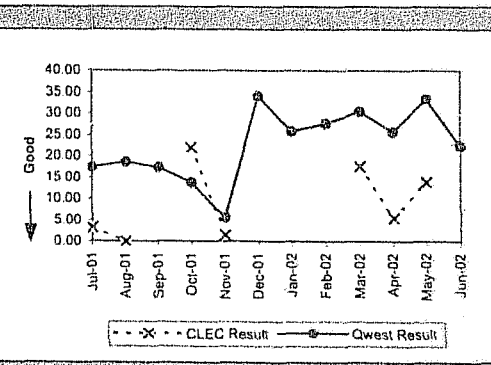
Percent Provisioning Met (Percent) (OP-3D) (Parity)-- Interval Zone One



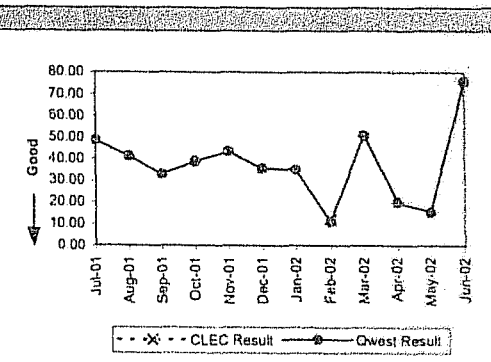
Average Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One



Average Interval For Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One



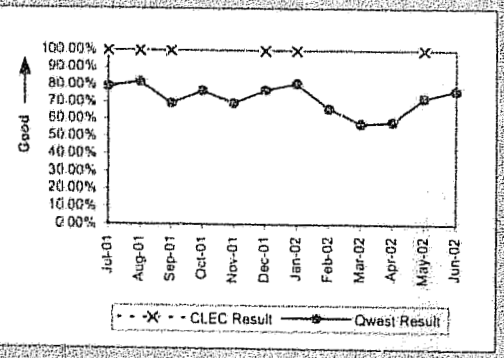
Average Days For Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One



Unbundled Transport (UDIT) Above DS1 Level Installation

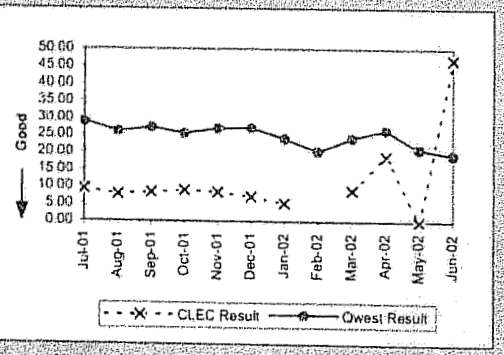
Interval Zone Two

				Qwest Zone	Qwest Resu	Mod Z Scr	Parity Score
				43	34.07%	-0.61	-1.31
				61	83.97%	-1.18	-1.71
				59	69.49%	-0.92	-1.56
				78	78.79%		
				60	69.57%		
				63	77.11%	-1.47	-1.89
				64	80.95%	-0.68	-1.41
				65	66.15%		
				73	57.53%		
				70	58.57%		
				67	72.41%	-0.61	-1.37
				29	10.71%		



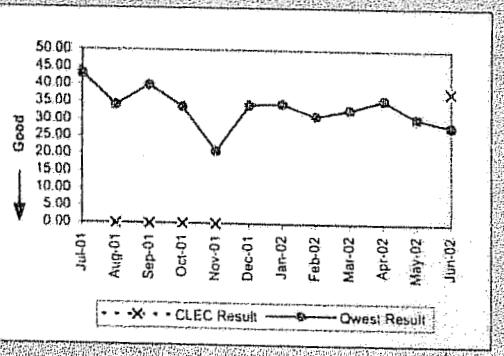
Interval Zone Two

				Qwest Zone	Qwest Resu	Mod Z Scr	Parity Score
				156	29.12	-0.87	-1.53
				106	26.19	-2.15	-2.31
				135	27.20	-1.38	-1.84
				201	25.56	-0.56	-1.34
				160	26.96	-0.57	-1.35
				132	27.20	-2.24	-2.36
				148	28.01	-1.3	-1.79
				108	28.49		
				127	24.15	-0.63	-1.36
				145	26.48	-0.38	-1.23
				157	21.09	-0.89	-1.54
				153	37.26	1.44	-0.12



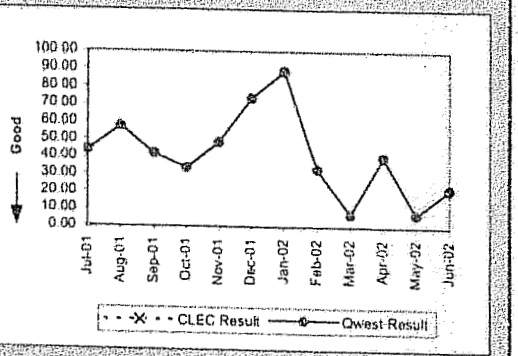
Parity - Interval Zone Two

				Qwest Zone	Qwest Resu	Mod Z Scr	Parity Score
				53	43.23		
				44	34.23	-0.94	-1.57
				38	39.89	-1	-1.61
				63	33.75	-0.96	-1.59
				88	20.92	-0.61	-1.37
				35	34.35		
				29	34.62		
				32	31.15		
				47	33.00		
				40	35.76		
				34	30.50		
				35	28.17	0.73	-0.56



Parity - Interval Zone Two

				Qwest Zone	Qwest Resu	Mod Z Scr	Parity Score
				6	44.00		
				6	57.83		
				8	42.13		
				6	33.67		
				11	48.82		
				5	74.60		
				4	89.00		
				2	33.50		
				2	7.50		
				3	40.33		
				2	7.50		
				2	22.00		

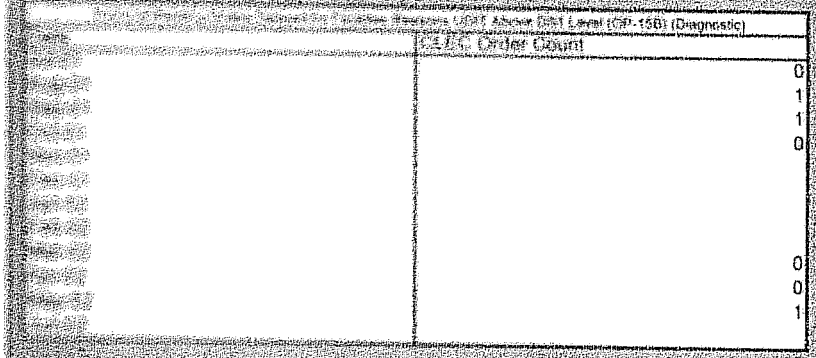


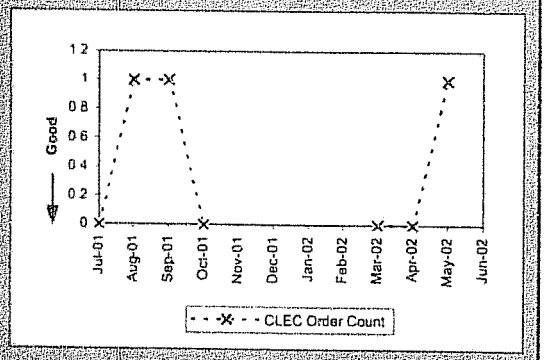
Provision #5 - Unbundled Transport (UDIT) Above DS1 Level Installation

Parity - Interval Zone One and Two

| | | |

Measure #5 - Unbundled Transport (UDIT) Above DS1 Level Installation

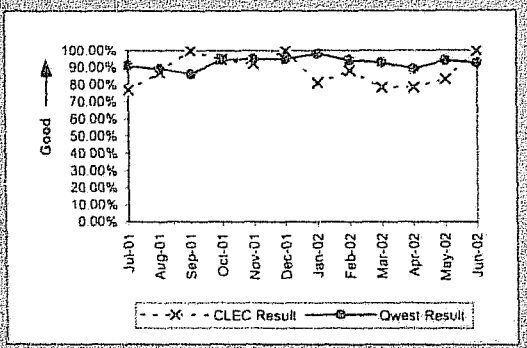




Checklist #5 - Unbundled Transport (UDIT) Above DS1 Level Repair

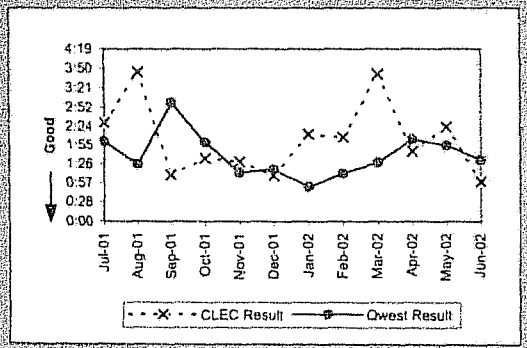
Mean Interval (UDIT) (Parity) - Interval Zone One

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
						90.91%	1.38	-0.16
						89.38%	0.25	-0.85
						86.36%	-1.16	-1.7
						94.81%	-0.03	-1.02
						95.28%	0.45	-0.73
						95.15%	-0.86	-1.52
						98.31%	2.54	0.54
						94.32%	0.85	-0.48
						93.14%	1.59	-0.03
						89.38%	1.1	-0.33
						94.34%	1.25	-0.24
						92.98%	-0.67	-1.53



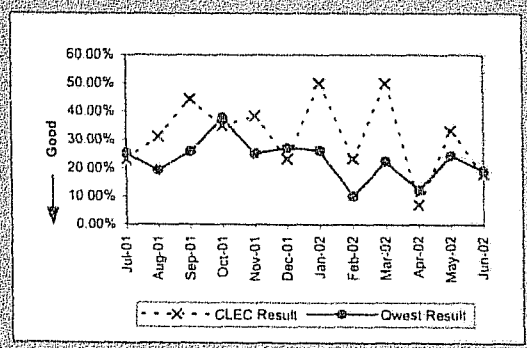
Mean Interval (UDIT) (Parity) - Interval Zone One

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
					99	2.01	0.97	-0.41
					113	1.26	1.23	-0.25
					154	3.90	-0.77	-1.47
					135	2.00	-0.26	-1.16
					127	1.19	1.19	-0.28
					103	1.16	-0.32	-1.19
					118	0.52	2.88	0.75
					88	1.12	1.58	-0.04
					102	1.29	2.33	0.41
					113	2.05	-0.18	-1.11
					106	1.55	0.71	-0.57
					114	1.33	-0.66	-1.4



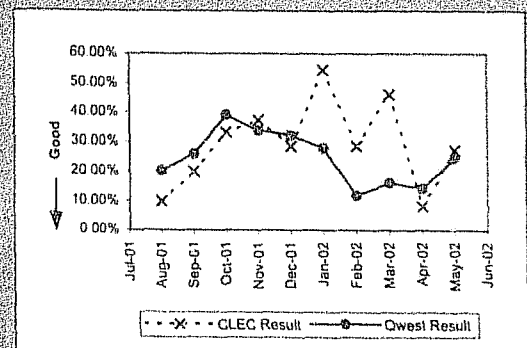
Mean Interval (UDIT) (Parity) - Interval Zone One

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
				25	99	25.25%	-0.17	-1.1
				22	113	19.47%	1.04	-0.37
				40	154	25.97%	1.15	-0.3
				51	135	37.78%	-0.24	-1.15
				32	127	25.20%	1	-0.39
				28	103	27.18%	-0.31	-1.19
				31	118	26.27%	1.87	0.13
				9	88	10.23%	1.4	-0.15
				23	102	22.55%	2.06	0.25
				14	113	12.39%	-0.56	-1.34
				26	106	24.53%	0.65	-0.6
				22	114	19.30%	-0.09	-1.05



Mean Interval (UDIT) (Parity) - Interval Zone One

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Score
				14	69	20.29%	-0.76	-1.46
				24	93	25.81%	-0.29	-1.18
				27	69	39.13%	-0.42	-1.25
				20	68	33.82%	0.2	-0.88
				20	62	32.26%	-0.27	-1.16
				17	61	27.87%	1.66	0.01
				6	50	12.00%	1.4	-0.15
				9	55	16.36%	2.14	0.3
				9	62	14.52%	-0.56	-1.34
				14	57	24.56%	0.19	-0.88



Checklist #5 - Unbundled Transport (UDIT) Above DS1 Level Repair

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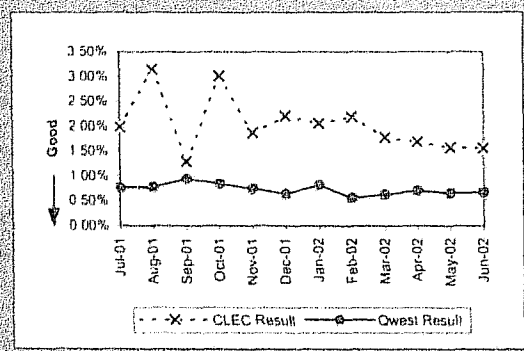
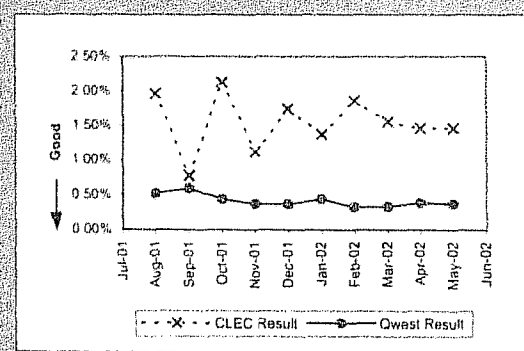
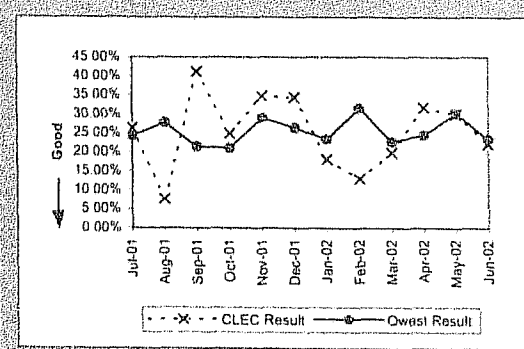
Checklist #5 - Unbundled Transport (UDIT) Above DS1 Level Repair



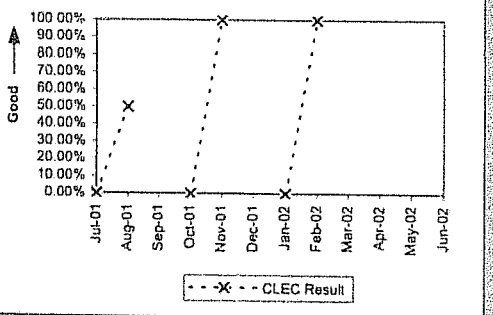




Checklist #5 - Dark Fiber - IOF Installation

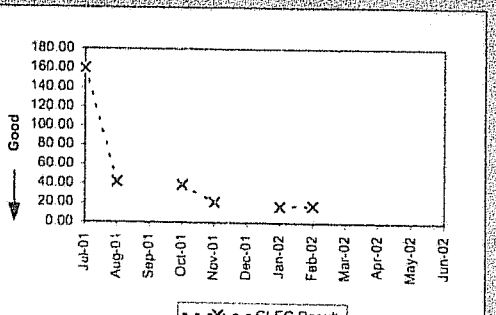
Provisioning Misses (Percent) (OP-3D) (Diagnostic)-- Interval Zone One

CLEC Num	CLEC Denom	CLEC Result	Std Dev
0	4	0.00%	0.00%
2	4	50.00%	50.00%
0	2	0.00%	0.00%
1	1	100.00%	0.00%
0	1	0.00%	0.00%
2	2	100.00%	0.00%



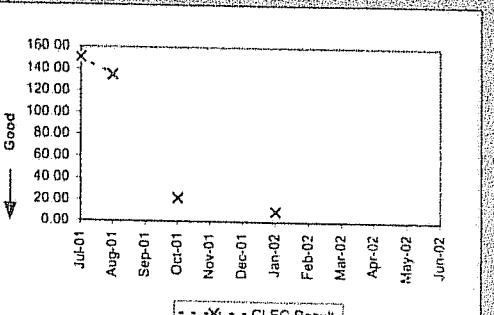
Provisioning Interval (Average Days) (OP-4D) (Diagnostic)-- Interval Zone One

CLEC Num	CLEC Denom	CLEC Result	Std Dev
640	4	160.00	0.00
168	4	42.00	68.77
78	2	39.00	0.00
21	1	21.00	
17	1	17.00	
36	2	18.00	0.00



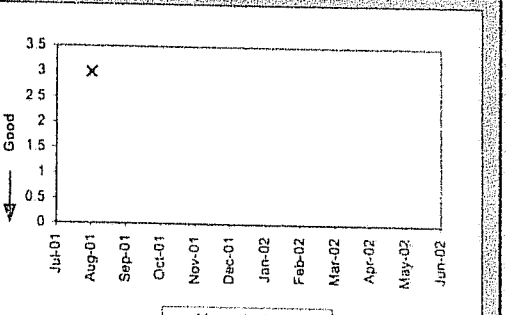
Provisioning Interval (Average Days) (OP-4A-4) (Diagnostic)-- Interval Zone One

CLEC Num	CLEC Denom	CLEC Result	Std Dev
604	4	151.00	0.00
135	1	135.00	
44	2	22.00	0.00
10	1	10.00	



Provisioning Interval (Average Days) (OP-4B-4) (Diagnostic)-- Interval Zone One

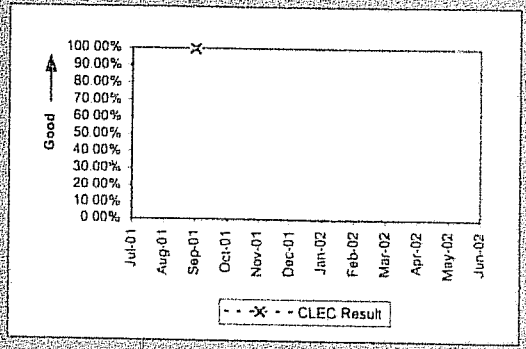
CLEC Num	CLEC Denom	CLEC Result	Std Dev
3	1	3.00	



Checklist #5 - Dark Fiber - IOF Installation

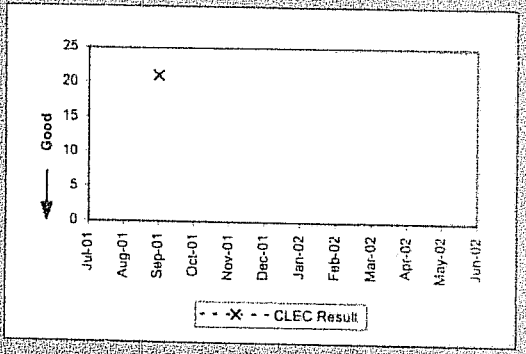
Installation Commitments Met (Percent) (OP-3E) (Diagnostic)-- Interval Zone Two

	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01	2	2	100.00%	0.00%
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



Installation Interval (Average Days) (OP-4E) (Diagnostic)-- Interval Zone Two

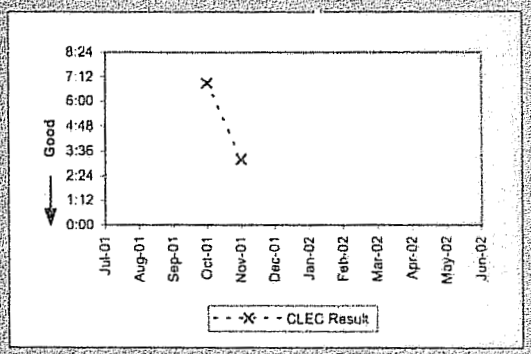
	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01	42	2	21.00	0.00
Oct-01				
Nov-01				
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



Checklist #5 - Dark Fiber - IOF Repair

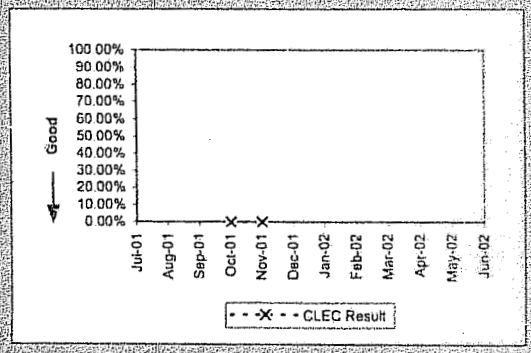
Mean Time to Restore (Hours:Minutes) (MR-6D) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01	20:41	3	6:54	6:49
Nov-01	9:38	3	3:13	0:02
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



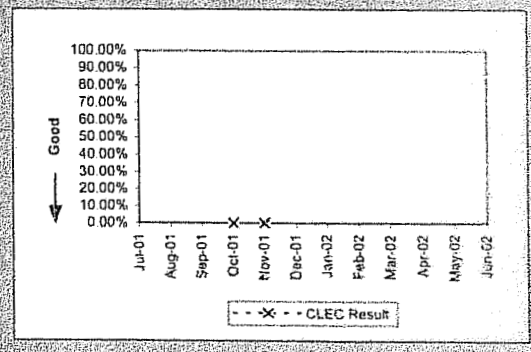
Repair Repeat Report Rate (Percent) (MR-7D) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01	0	3	0.00%	0.00%
Nov-01	0	3	0.00%	0.00%
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



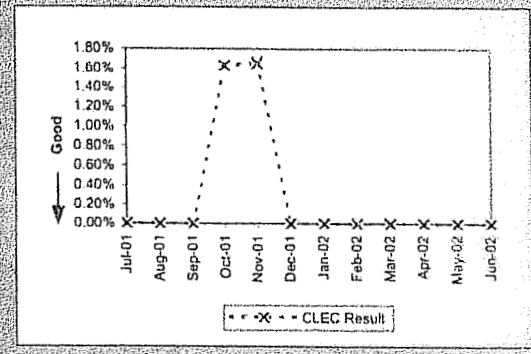
Repair Repeat Report Rate (Percent) (MR-7D*) (Diagnostic)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01				
Sep-01				
Oct-01	0	2	0.00%	0.00%
Nov-01	0	3	0.00%	0.00%
Dec-01				
Jan-02				
Feb-02				
Mar-02				
Apr-02				
May-02				
Jun-02				



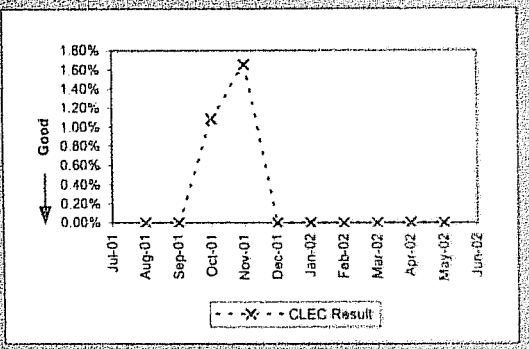
Trouble Rate (Percent) (MR-8) (Diagnostic)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01	0	213	0.00%	0.00%
Aug-01	0	202	0.00%	0.00%
Sep-01	0	184	0.00%	0.00%
Oct-01	3	184	1.63%	12.66%
Nov-01	3	181	1.66%	12.77%
Dec-01	0	181	0.00%	0.00%
Jan-02	0	170	0.00%	0.00%
Feb-02	0	148	0.00%	0.00%
Mar-02	0	137	0.00%	0.00%
Apr-02	0	133	0.00%	0.00%
May-02	0	113	0.00%	0.00%
Jun-02	0	113	0.00%	0.00%



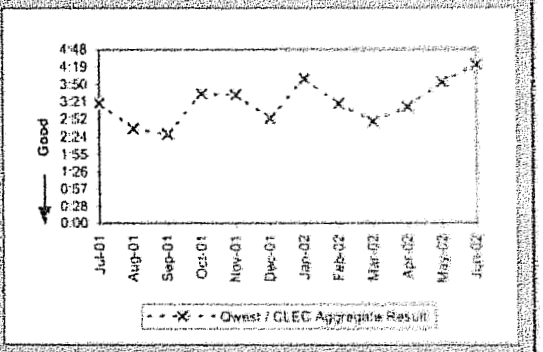
Checklist #5 - Dark Fiber - IOF Repair

Trouble Rate (Percent) (MR-8*) (Diagnostic)-- Interval Zone One and Two				
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev
Jul-01				
Aug-01	0	202	0.00%	0.00%
Sep-01	0	184	0.00%	0.00%
Oct-01	2	184	1.09%	10.37%
Nov-01	3	181	1.66%	12.77%
Dec-01	0	181	0.00%	0.00%
Jan-02	0	170	0.00%	0.00%
Feb-02	0	148	0.00%	0.00%
Mar-02	0	137	0.00%	0.00%
Apr-02	0	133	0.00%	0.00%
May-02	0	113	0.00%	0.00%
Jun-02				



Checklist #7 - E911

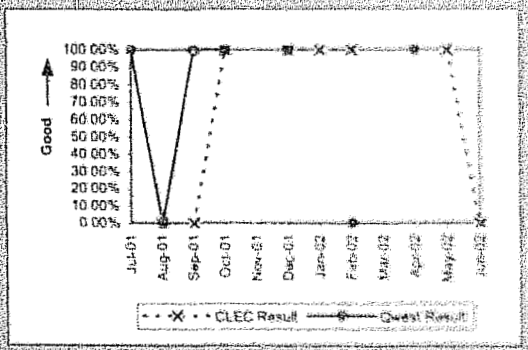
Time to Update Databases (Hours:Minutes) (DB-1A) (Parity)	
Date	Qwest / CLEC Aggregate Result
Jul-01	3:19
Aug-01	2:38
Sep-01	2:29
Oct-01	3:35
Nov-01	3:33
Dec-01	2:54
Jan-02	4:00
Feb-02	3:18
Mar-02	2:49
Apr-02	3:13
May-02	3:54
Jun-02	4:23



Checklist #7 - E911/911 Trunk Installation

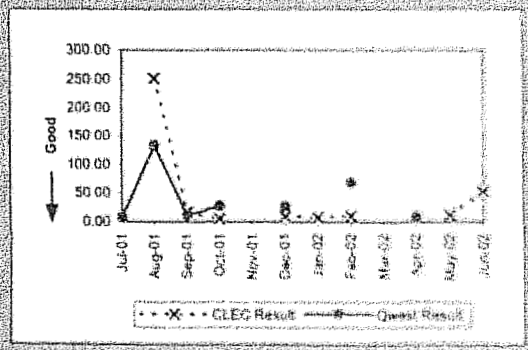
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					2	2	100.00%		
Aug-01	0	2	0.00%	0.00%	0	6	0.00%	N/A	N/A
Sep-01	0	6	0.00%	0.00%	4	4	100.00%	N/A	0.85
Oct-01	2	2	100.00%	0.00%	9	9	100.00%	N/A	N/A
Nov-01									
Dec-01	3	3	100.00%	0.00%	1	1	100.00%	N/A	N/A
Jan-02	1	1	100.00%	0.00%					
Feb-02	16	16	100.00%	0.00%	0	3	0.00%	N/A	
Mar-02									
Apr-02					5	5	100.00%		
May-02	8	8	100.00%	0.00%					
Jun-02	0	2	0.00%	0.00%					



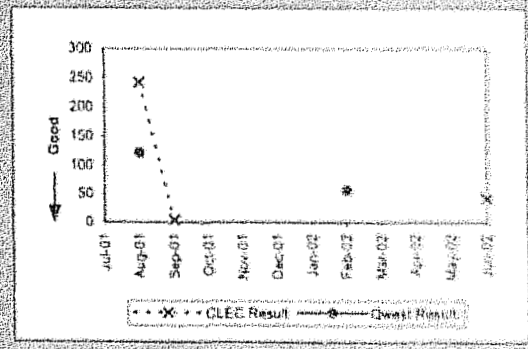
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					16	2	8.00		
Aug-01	504	2	252.00	227.69	800	6	133.33	3.72	1.26
Sep-01	102	6	17.00	0.00	46	4	11.50	3.72	1.26
Oct-01	11	2	5.50	4.95	246	9	27.33	-1.3	-1.79
Nov-01									
Dec-01	28	3	9.33	0.58	27	1	27.00		
Jan-02	8	1	8.00						
Feb-02	174	16	10.88	0.34	206	3	68.67	-1.94	-2.18
Mar-02									
Apr-02					43	5	8.60		
May-02	97	8	12.12	3.36					
Jun-02	106	2	53.00	0.00					



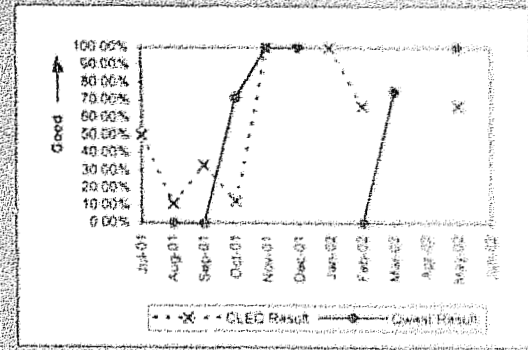
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	485	2	242.50	228.40	734	6	122.33	3.72	1.26
Sep-01	30	6	5.00	0.00					
Oct-01									
Nov-01									
Dec-01									
Jan-02									
Feb-02					171	3	57.00		
Mar-02									
Apr-02									
May-02									
Jun-02	86	2	43.00	0.00					



Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

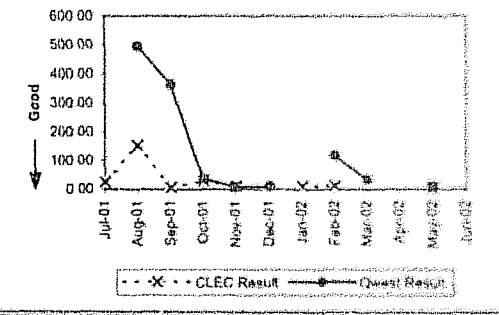
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	1	2	50.00%	50.00%					
Aug-01	1	9	11.11%	31.43%	0	2	0.00%	N/A	
Sep-01	1	3	33.33%	47.14%	0	4	0.00%	N/A	
Oct-01	1	8	12.50%	33.07%	5	7	71.43%	2.18	0.33
Nov-01	1	1	100.00%	0.00%	10	10	100.00%	N/A	N/A
Dec-01					3	3	100.00%		
Jan-02	1	1	100.00%	0.00%					
Feb-02	2	3	66.67%	47.14%	0	5	0.00%	N/A	
Mar-02					3	4	75.00%		
Apr-02									
May-02	2	3	66.67%	47.14%	2	2	100.00%	N/A	-0.71
Jun-02									



Checklist #7 - E911/911 Trunk Installation

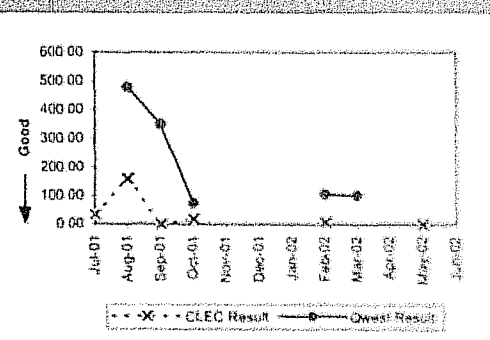
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	51	2	25.50	21.92					
Aug-01	1365	9	153.89	54.33	990	2	495.00	-0.67	-1.41
Sep-01	20	3	6.67	0.58	1456	4	364.00		
Oct-01	247	8	30.88	6.01	254	7	36.29	-0.24	-1.14
Nov-01	11	1	11.00		84	10	8.40	3.72	1.26
Dec-01					32	3	10.67		
Jan-02	12	1	12.00						
Feb-02	39	3	13.00	4.00	592	5	118.40	-3.47	-3.11
Mar-02					138	4	34.50		
Apr-02									
May-02	15	3	5.00	4.36	22	2	11.00	-2.32	-2.41
Jun-02									



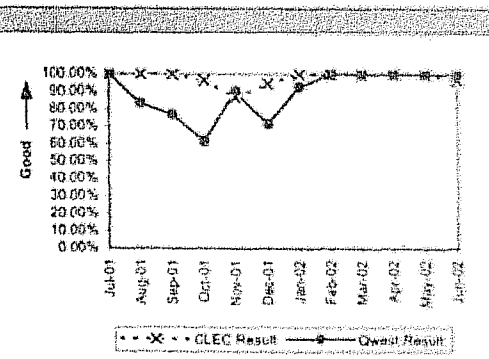
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	34	1	34.00						
Aug-01	1286	8	161.00	0.00	959	2	479.50	-0.62	-.38
Sep-01	2	2	1.00	0.00	1400	4	350.00		
Oct-01	133	7	19.00	0.00	150	2	75.00	-1.7	-2.04
Nov-01									
Dec-01									
Jan-02									
Feb-02	7	1	7.00		530	5	106.00	-2.25	-2.37
Mar-02					102	1	102.00		
Apr-02									
May-02	1	1	1.00						
Jun-02									



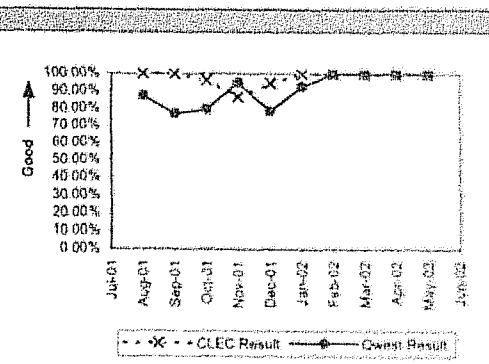
New Service Installation Quality (Percent) (OP-5) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	48	48	100.00%	0.00%	25	25	100.00%	N/A	N/A
Aug-01	46	46	100.00%	0.00%	20	24	83.33%	-1.78	-2.08
Sep-01	43	43	100.00%	0.00%	20	26	76.92%	-2.2	-2.34
Oct-01	55	57	96.49%	18.40%	21	34	61.76%	-3.3	-3
Nov-01	33	38	86.84%	33.80%	19	21	90.48%	0.33	-0.8
Dec-01	18	19	94.74%	22.33%	10	14	71.43%	-1.46	-1.89
Jan-02	26	26	100.00%	0.00%	13	14	92.86%	-0.84	-1.51
Feb-02	32	32	100.00%	0.00%	20	20	100.00%	N/A	N/A
Mar-02	26	26	100.00%	0.00%	22	22	100.00%	N/A	N/A
Apr-02	3	3	100.00%	0.00%	26	26	100.00%	N/A	N/A
May-02	22	22	100.00%	0.00%	32	32	100.00%	N/A	N/A
Jun-02	31	32	96.88%	17.40%	17	17	100.00%	N/A	-0.76



New Service Installation Quality (Percent) (OP-5*) (Parity)-- Interval Zone One and Two

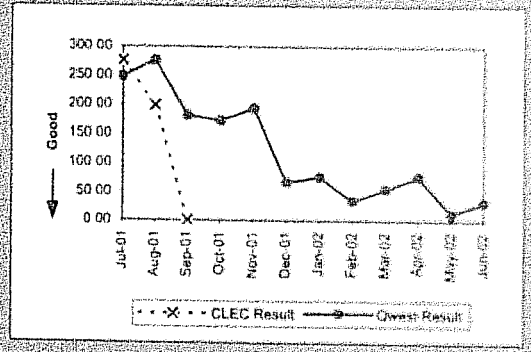
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	46	46	100.00%	0.00%	21	24	87.50%	-1.5	-1.91
Sep-01	43	43	100.00%	0.00%	20	26	76.92%	-2.2	-2.34
Oct-01	55	57	96.49%	18.40%	27	34	79.41%	-1.95	-2.19
Nov-01	33	38	86.84%	33.80%	20	21	95.24%	0.95	-0.42
Dec-01	18	19	94.74%	22.33%	11	14	78.57%	-1.12	-1.68
Jan-02	26	26	100.00%	0.00%	13	14	92.86%	-0.84	-1.51
Feb-02	32	32	100.00%	0.00%	20	20	100.00%	N/A	N/A
Mar-02	26	26	100.00%	0.00%	22	22	100.00%	N/A	N/A
Apr-02	3	3	100.00%	0.00%	26	26	100.00%	N/A	N/A
May-02	22	22	100.00%	0.00%	32	32	100.00%	N/A	N/A
Jun-02									



Checklist #7 - E911/911 Trunk Installation

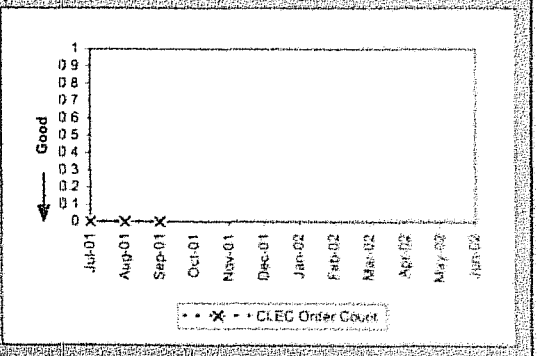
Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	1106	4	276.50	100.81	10931	44	248.43	1.32	-0.2
Aug-01	798	4	199.50	145.70	8297	30	276.57	-0.95	-1.58
Sep-01	3	3	1.00	0.00	2717	15	181.13	-1.31	-1.79
Oct-01					3113	18	172.94		
Nov-01					3491	18	193.94		
Dec-01					336	5	67.20		
Jan-02					460	6	76.67		
Feb-02					34	1	34.00		
Mar-02					55	1	55.00		
Apr-02					77	1	77.00		
May-02					12	1	12.00		
Jun-02					32	1	32.00		



Checklist #7 - E911/911 Trunk Installation

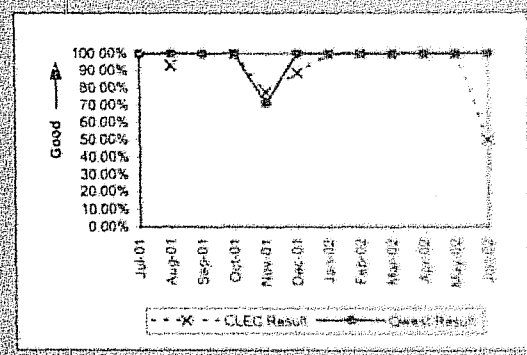
Count of Pending Orders Delayed for Facilities Reasons E911 (OP-15B) (Diagnostic)	
Date	CLEC Order Count
Jul-01	0
Aug-01	0
Sep-01	0
Oct-01	
Nov-01	
Dec-01	
Jan-02	
Feb-02	
Mar-02	
Apr-02	
May-02	
Jun-02	



Checklist #7 - E911/911 Trunk Repair

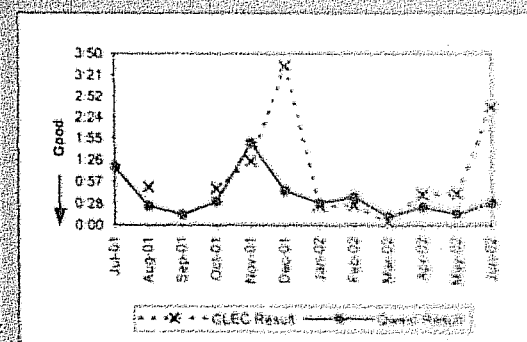
All Troubles Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01					5	5	100.00%		
Aug-01	14	15	93.33%	24.94%	17	17	100.00%	N/A	-0.58
Sep-01					9	9	100.00%		
Oct-01	5	5	100.00%	0.00%	11	11	100.00%	N/A	N/A
Nov-01	7	9	77.78%	41.57%	5	7	71.43%	-0.28	-1.17
Dec-01	8	9	88.89%	31.43%	9	9	100.00%	N/A	-0.62
Jan-02	10	10	100.00%	0.00%	7	7	100.00%	N/A	N/A
Feb-02	17	17	100.00%	0.00%	12	12	100.00%	N/A	N/A
Mar-02	10	10	100.00%	0.00%	12	12	100.00%	N/A	N/A
Apr-02	6	6	100.00%	0.00%	6	6	100.00%	N/A	N/A
May-02	3	3	100.00%	0.00%	5	5	100.00%	N/A	N/A
Jun-02	1	2	50.00%	50.00%	5	5	100.00%	N/A	-0.32



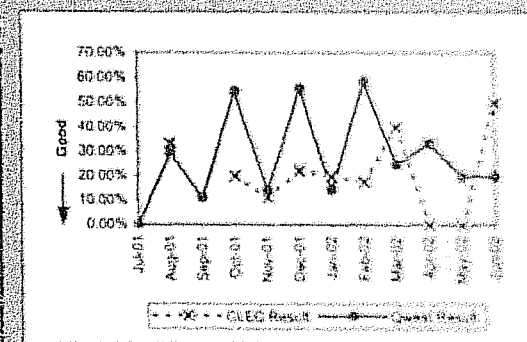
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01					6:24	5	1:17		
Aug-01	12:46	15	0:51	2:12	7:19	17	0:26	1.72	0.04
Sep-01					2:10	9	0:14		
Oct-01	4:05	5	0:49	0:35	5:57	11	0:32	0.56	-0.66
Nov-01	12:46	9	1:25	2:18	12:44	7	1:49	-0.32	-1.19
Dec-01	32:10	9	3:34	9:44	6:57	9	0:46	-0.06	-1.04
Jan-02	4:24	10	0:26	0:54	3:29	7	0:30	-0.17	-1.1
Feb-02	7:31	17	0:27	0:53	7:30	12	0:38	-0.55	-1.33
Mar-02	0:50	10	0:05	0:07	2:22	12	0:12	-1.53	-1.93
Apr-02	4:06	6	0:41	0:53	2:22	6	0:24	0.37	-0.78
May-02	2:10	3	0:43	0:42	1:21	5	0:16	0.97	-0.41
Jun-02	5:15	2	2:38	2:01	2:29	5	0:30	1.54	-0.06



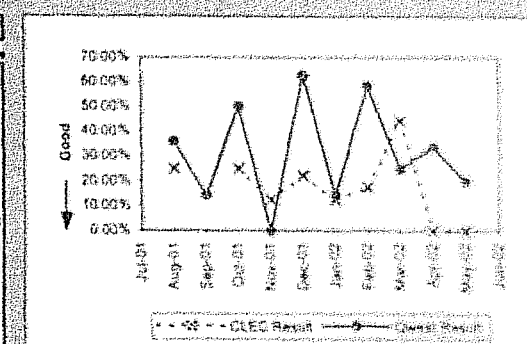
Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01					0	5	0.00%		
Aug-01	5	15	33.33%	47.14%	5	17	29.41%	0.19	-0.88
Sep-01					1	9	11.11%		
Oct-01	1	5	20.00%	40.00%	6	11	54.55%	-1.29	-1.78
Nov-01	1	9	11.11%	31.43%	1	7	14.29%	-0.18	-1.11
Dec-01	2	9	22.22%	41.57%	5	9	55.56%	-1.42	-1.87
Jan-02	2	10	20.00%	40.00%	1	7	14.29%	0.12	-0.93
Feb-02	3	17	17.65%	38.12%	7	12	58.33%	-2.19	-2.33
Mar-02	4	10	40.00%	48.99%	3	12	25.00%	0.67	-0.59
Apr-02	0	6	0.00%	0.00%	2	6	33.33%	-1.22	-1.74
May-02	0	3	0.00%	0.00%	1	5	20.00%	-0.68	-1.42
Jun-02	1	2	50.00%	50.00%	1	5	20.00%	0.5	-0.69



Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

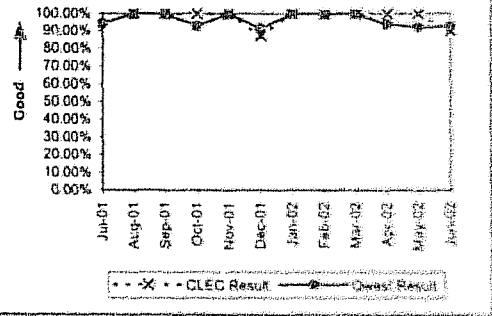
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Score
Jul-01									
Aug-01	3	12	25.00%	43.30%	5	14	35.71%	-0.57	-1.35
Sep-01					1	7	14.29%		
Oct-01	1	4	25.00%	43.30%	4	8	50.00%	-0.82	-1.5
Nov-01	1	8	12.50%	33.07%	0	5	0.00%	N/A	-0.72
Dec-01	2	9	22.22%	41.57%	5	8	62.50%	-1.71	-2.04
Jan-02	1	8	12.50%	33.07%	1	7	14.29%	-0.1	-1.06
Feb-02	3	17	17.65%	38.12%	7	12	58.33%	-2.19	-2.33
Mar-02	4	9	44.44%	49.69%	3	12	25.00%	0.85	-0.48
Apr-02	0	3	0.00%	0.00%	2	6	33.33%	-1	-1.61
May-02	0	3	0.00%	0.00%	1	5	20.00%	-0.68	-1.42
Jun-02									



Checklist #7 - E911/911 Trunk Repair

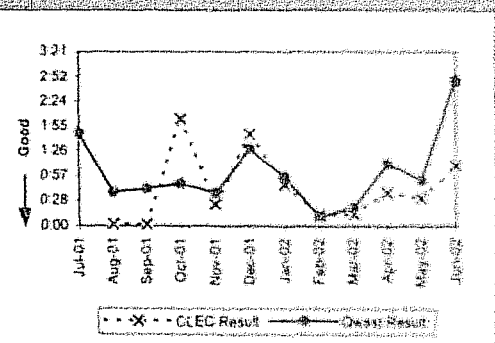
All Troubles Cleared within 4 hours (Percent) (MR-5B) (Parity)– Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Score
Jul-01					33	35	94.29%		
Aug-01	2	2	100.00%	0.00%	20	20	100.00%	N/A	N/A
Sep-01	1	1	100.00%	0.00%	14	14	100.00%	N/A	N/A
Oct-01	2	2	100.00%	0.00%	26	28	92.86%	-0.38	-1.23
Nov-01	10	10	100.00%	0.00%	11	11	100.00%	N/A	N/A
Dec-01	7	8	87.50%	33.07%	11	12	91.67%	0.2	-0.88
Jan-02	4	4	100.00%	0.00%	9	9	100.00%	N/A	N/A
Feb-02	2	2	100.00%	0.00%	12	12	100.00%	N/A	N/A
Mar-02	3	3	100.00%	0.00%	13	13	100.00%	N/A	N/A
Apr-02	3	3	100.00%	0.00%	15	16	93.75%	-0.41	-1.25
May-02	1	1	100.00%	0.00%	12	13	92.31%	-0.28	-1.17
Jun-02	9	10	90.00%	30.00%	12	13	92.31%	0.1	-0.94



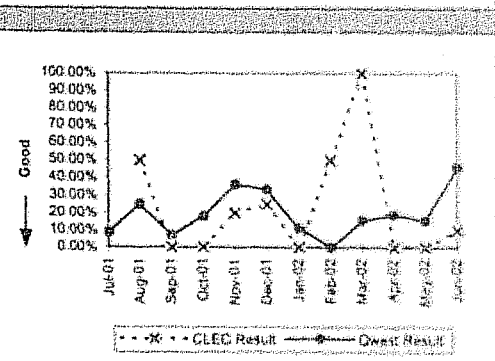
Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)– Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Score
Jul-01					62:24	35	1:47		
Aug-01	0:05	2	0:02	0:01	12:58	20	0:39	-0.86	-1.52
Sep-01	0:02	1	0:02		10:00	14	0:43	-0.92	-1.56
Oct-01	4:08	2	2:04	0:18	22:56	28	0:49	1.43	-0.13
Nov-01	4:07	10	0:25	0:40	6:57	11	0:38	-0.43	-1.26
Dec-01	14:08	8	1:46	2:05	17:53	12	1:29	0.19	-0.88
Jan-02	3:12	4	0:48	0:54	8:37	9	0:57	-0.24	-1.14
Feb-02	0:25	2	0:13	0:16	2:08	12	0:11	0.49	-0.7
Mar-02	0:43	3	0:14	0:13	4:34	13	0:21	-0.26	-1.16
Apr-02	1:57	3	0:39	0:16	19:08	16	1:12	-0.59	-1.36
May-02	0:32	1	0:32		11:32	13	0:53	-0.26	-1.16
Jun-02	11:41	10	1:10	1:24	36:36	13	2:49	-0.64	-1.39



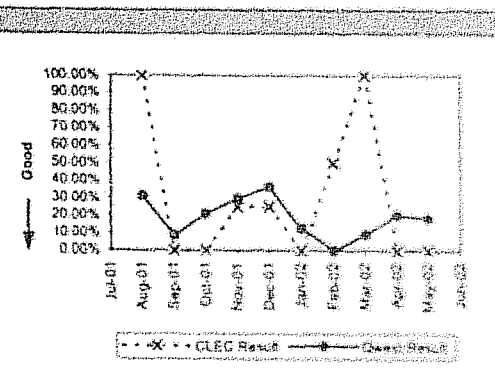
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)– Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Score
Jul-01					3	35	8.57%		
Aug-01	1	2	50.00%	50.00%	5	20	25.00%	0.58	-0.65
Sep-01	0	1	0.00%	0.00%	1	14	7.14%	-0.27	-1.16
Oct-01	0	2	0.00%	0.00%	5	28	17.86%	-0.64	-1.39
Nov-01	2	10	20.00%	40.00%	4	11	36.36%	-0.78	-1.47
Dec-01	2	8	25.00%	43.30%	4	12	33.33%	-0.39	-1.24
Jan-02	0	4	0.00%	0.00%	1	9	11.11%	-0.59	-1.36
Feb-02	1	2	50.00%	50.00%	0	12	0.00%	N/A	-0.05
Mar-02	3	3	100.00%	0.00%	2	13	15.38%	2.55	0.55
Apr-02	0	3	0.00%	0.00%	3	16	18.75%	-0.76	-1.46
May-02	0	1	0.00%	0.00%	2	13	15.38%	-0.41	-1.25
Jun-02	1	10	10.00%	30.00%	6	13	46.15%	-1.72	-2.05



Repair Repeat Report Rate (Percent) (MR-7E*) (Parity)– Interval Zone Two

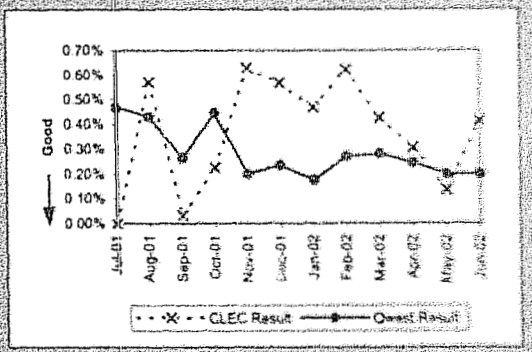
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Score
Jul-01									
Aug-01	1	1	100.00%	0.00%	5	16	31.25%	0.96	-0.42
Sep-01	0	1	0.00%	0.00%	1	12	8.33%	-0.29	-1.18
Oct-01	0	1	0.00%	0.00%	5	24	20.83%	-0.5	-1.31
Nov-01	2	8	25.00%	43.30%	3	10	30.00%	-0.23	-1.14
Dec-01	2	8	25.00%	43.30%	4	11	36.36%	-0.51	-1.31
Jan-02	0	4	0.00%	0.00%	1	8	12.50%	-0.62	-1.38
Feb-02	1	2	50.00%	50.00%	0	10	0.00%	N/A	-0.11
Mar-02	3	3	100.00%	0.00%	1	11	9.09%	2.74	0.66
Apr-02	0	2	0.00%	0.00%	3	15	20.00%	-0.66	-1.4
May-02	0	1	0.00%	0.00%	2	11	18.18%	-0.45	-1.27
Jun-02									



Checklist #7 - E911/911 Trunk Repair

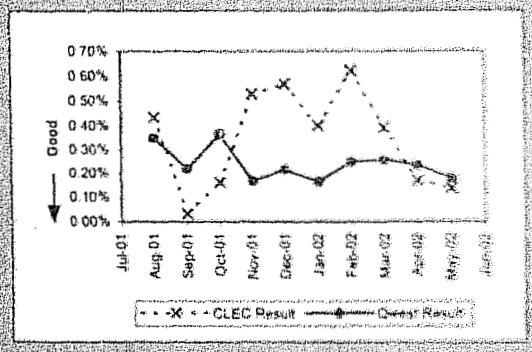
Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	0	2832	0.00%	0.00%	40	8533	0.47%	-3.16	-2.92
Aug-01	17	2981	0.57%	7.53%	37	8607	0.43%	1.01	-0.39
Sep-01	1	3009	0.03%	1.82%	23	8693	0.26%	-2.13	-2.29
Oct-01	7	3093	0.23%	4.75%	39	8769	0.44%	-1.57	-1.95
Nov-01	19	3024	0.63%	7.90%	18	9003	0.20%	4.56	1.77
Dec-01	17	2997	0.57%	7.51%	21	8956	0.23%	3.26	0.98
Jan-02	14	2992	0.47%	6.82%	16	9144	0.18%	3.33	1.02
Feb-02	19	3061	0.62%	7.85%	24	8930	0.27%	3.25	0.97
Mar-02	13	3059	0.43%	6.51%	25	8971	0.28%	1.33	-0.19
Apr-02	9	2965	0.30%	5.50%	22	9012	0.24%	0.57	-0.65
May-02	4	2936	0.14%	3.69%	18	9026	0.20%	-0.67	-1.41
Jun-02	12	2908	0.41%	6.41%	18	9051	0.20%	2.25	0.37



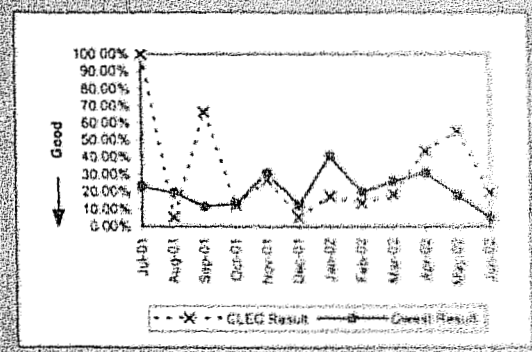
Trouble Rate (Percent) (MR-8*) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Score
Jul-01									
Aug-01	13	2981	0.44%	6.59%	30	8607	0.35%	0.7	-0.58
Sep-01	1	3009	0.03%	1.82%	19	8693	0.22%	-1.88	-2.14
Oct-01	5	3093	0.16%	4.02%	32	8769	0.36%	-1.61	-1.98
Nov-01	16	3024	0.53%	7.25%	15	9003	0.17%	4.23	1.57
Dec-01	17	2997	0.57%	7.51%	19	8956	0.21%	3.66	1.22
Jan-02	12	2992	0.40%	6.32%	15	9144	0.16%	2.78	0.69
Feb-02	19	3061	0.62%	7.85%	22	8930	0.25%	3.61	1.19
Mar-02	12	3059	0.39%	6.25%	23	8971	0.26%	1.28	-0.22
Apr-02	5	2965	0.17%	4.10%	21	9012	0.23%	-0.63	-1.38
May-02	4	2936	0.14%	3.69%	16	9026	0.18%	-0.46	-1.28
Jun-02									



Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)-- Interval Zone One and Two

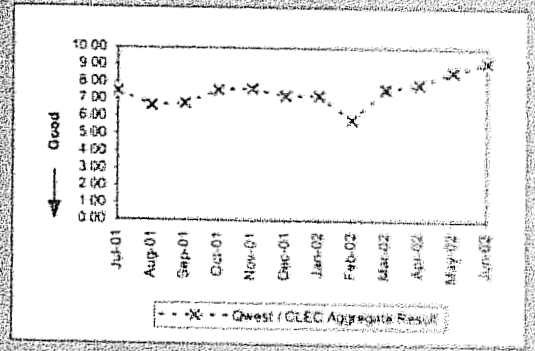
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Score
Jul-01	4	4	100.00%	0.00%	12	52	23.08%	2.95	0.79
Aug-01	1	18	5.56%	22.91%	9	46	19.57%	-1.27	-1.77
Sep-01	2	3	66.67%	47.14%	3	26	11.54%	1.9	0.15
Oct-01	1	8	12.50%	33.07%	6	45	13.33%	-0.06	-1.04
Nov-01	7	26	26.92%	44.36%	8	26	30.77%	-0.3	-1.18
Dec-01	1	18	5.56%	22.91%	3	24	12.50%	-0.67	-1.41
Jan-02	3	17	17.65%	38.12%	11	27	40.74%	-1.52	-1.92
Feb-02	3	22	13.64%	34.32%	6	30	20.00%	-0.57	-1.34
Mar-02	3	16	18.75%	39.03%	9	34	26.47%	-0.58	-1.35
Apr-02	7	16	43.75%	49.61%	10	32	31.25%	0.75	-0.54
May-02	5	9	55.56%	49.69%	4	22	18.18%	1.94	0.18
Jun-02	3	15	20.00%	40.00%	1	19	5.26%	1.2	-0.27



Checklist #7 - Operator Services - Directory Assistance

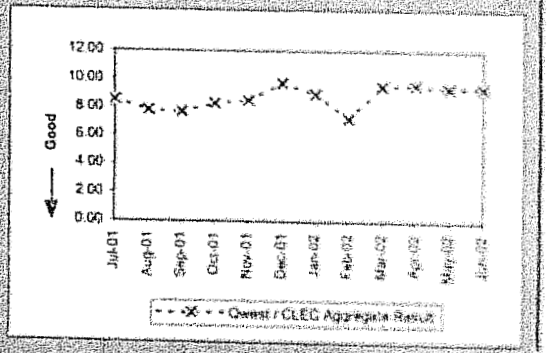
Speed of Answer - Directory Assistance (Avg Sec) (DA-1) (Parity)

Date	Qwest / CLEC Aggregate Result
Jul-01	7.48
Aug-01	6.66
Sep-01	6.79
Oct-01	7.56
Nov-01	7.64
Dec-01	7.23
Jan-02	7.26
Feb-02	5.85
Mar-02	7.63
Apr-02	7.90
May-02	8.64
Jun-02	9.22



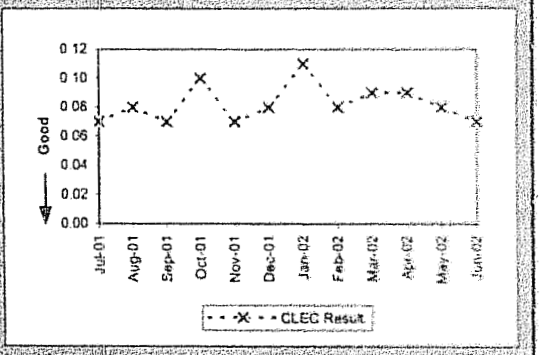
Speed of Answer - Operator Services (Avg Sec) (OS-1) (Parity)

Date	Qwest / CLEC Aggregate Result
Jul-01	8.55
Aug-01	7.82
Sep-01	7.70
Oct-01	8.31
Nov-01	8.54
Dec-01	9.78
Jan-02	9.01
Feb-02	7.26
Mar-02	9.55
Apr-02	9.64
May-02	9.42
Jun-02	9.43

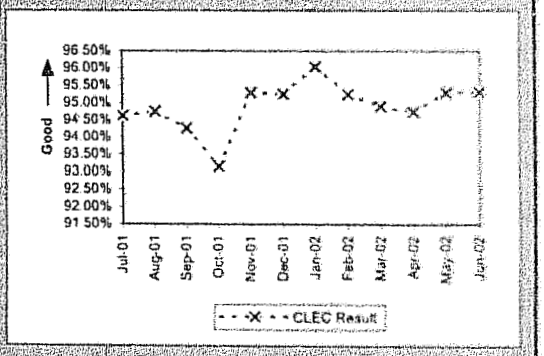


Checklist #8 - Directory Listings

Time to Update Databases (Avg Sec) (DB-1C-1) (Parity)	
Date	CLEC Result
Jul-01	0.07
Aug-01	0.08
Sep-01	0.07
Oct-01	0.10
Nov-01	0.07
Dec-01	0.08
Jan-02	0.11
Feb-02	0.08
Mar-02	0.09
Apr-02	0.09
May-02	0.08
Jun-02	0.07



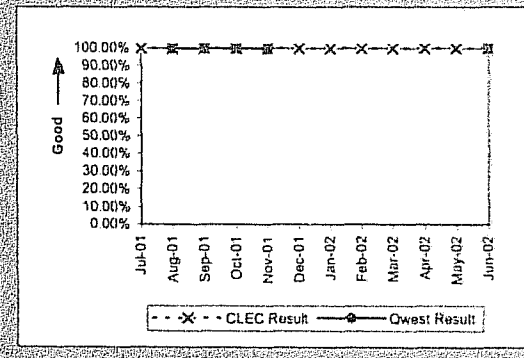
Accurate Database Updates (Percent) (DB-2C-1) (Parity)	
Date	CLEC Result
Jul-01	94.63%
Aug-01	94.75%
Sep-01	94.25%
Oct-01	93.16%
Nov-01	95.29%
Dec-01	95.26%
Jan-02	96.05%
Feb-02	95.25%
Mar-02	94.91%
Apr-02	94.75%
May-02	95.30%
Jun-02	95.32%



Checklist #9 - NXX Code Activation

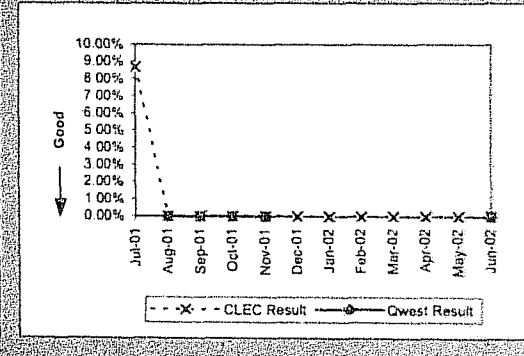
NXX Code Activation (Percent) (NP-1A) (Parity)

[illegible]	CLEC Num	CLEC Denom	CLEC Result	Qwest Num	Qwest Denom	Qwest Result
[illegible]	23	23	100.00%			
[illegible]	32	32	100.00%	4	4	100.00%
[illegible]	8	8	100.00%	3	3	100.00%
[illegible]	18	18	100.00%	1	1	100.00%
[illegible]	15	15	100.00%	2	2	100.00%
[illegible]	21	21	100.00%			
[illegible]	9	9	100.00%			
[illegible]	7	7	100.00%			
[illegible]	9	9	100.00%			
[illegible]	14	14	100.00%			
[illegible]	7	7	100.00%			
[illegible]	1	1	100.00%	2	2	100.00%



NXX Code Activation - Facility Delays (Percent) (NP-1B) (Diagnostic)

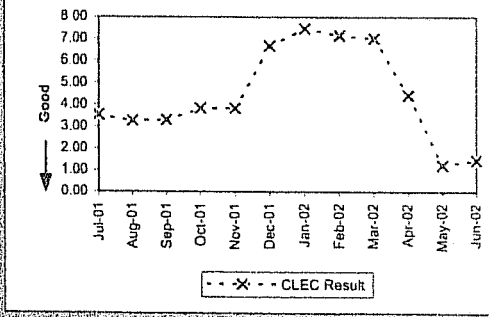
[illegible]	CLEC Num	CLEC Denom	CLEC Result	Qwest Num	Qwest Denom	Qwest Result
[illegible]	2	23	8.70%			
[illegible]	0	32	0.00%	0	4	0.00%
[illegible]	0	8	0.00%	0	3	0.00%
[illegible]	0	18	0.00%	0	1	0.00%
[illegible]	0	15	0.00%	0	2	0.00%
[illegible]	0	21	0.00%			
[illegible]	0	9	0.00%			
[illegible]	0	7	0.00%			
[illegible]	0	9	0.00%			
[illegible]	0	14	0.00%			
[illegible]	0	7	0.00%			
[illegible]	0	1	0.00%	0	2	0.00%



Checklist #10 - Databases and Signaling

Time to Update Databases (Avg Sec) LIDB (DB-1B) (Parity)

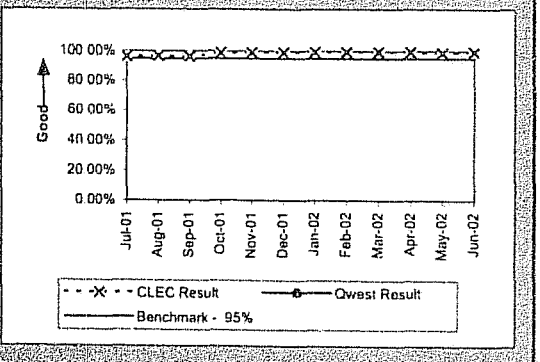
Date	CLEC Result
[illegible]	3.55
[illegible]	3.28
[illegible]	3.31
[illegible]	3.85
[illegible]	3.85
[illegible]	6.68
[illegible]	7.47
[illegible]	7.17
[illegible]	7.02
[illegible]	4.44
[illegible]	1.25
[illegible]	1.47



Checklist #11 - Number Portability**

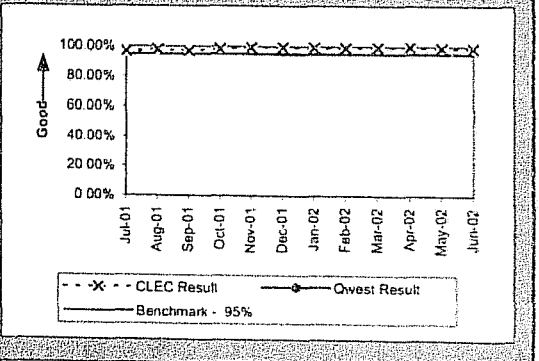
Number Portability Timeliness (Percent) (OP-8B) (Benchmark)

				95.55%	18.25%				
				96.96%	17.33%				
				96.63%	18.30%				
				96.88%	10.52%				
				99.13%	9.30%				
				99.10%	9.42%				
				99.69%	5.57%				
				99.64%	5.62%				
				99.81%	4.32%				
				99.54%	6.78%				
				98.46%	10.53%				
				99.58%	6.58%				



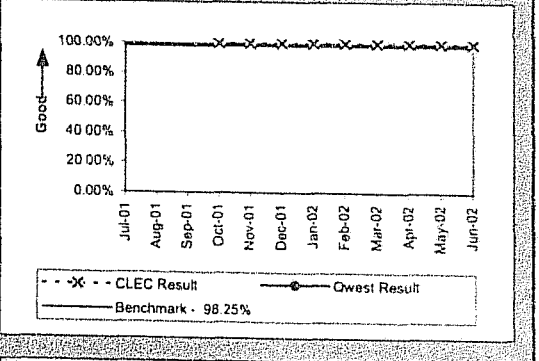
Percentage of LNP Triggers Set Prior to the Frame Due Time (Percent) (OP-8C) (Benchmark)

				98.80%	17.44%				
				98.13%	13.54%				
				97.14%	16.06%				
				98.51%	12.12%				
				99.44%	7.49%				
				99.54%	6.75%				
				99.33%	8.17%				
				99.69%	5.50%				
				99.51%	6.98%				
				99.70%	5.47%				
				99.67%	5.59%				
				98.92%	10.02%				



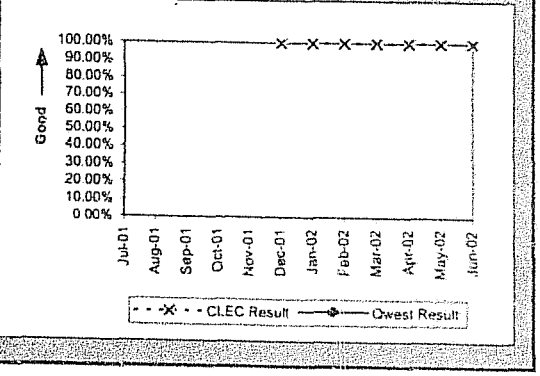
Timeliness of Disconnects Associated with LNP Orders (Percent) (OP-17A) (Benchmark)

				99.95%	0.95%				
				99.99%	0.61%				
				99.98%	1.41%				
				99.98%	1.25%				
				99.99%	0.89%				
				100.00%	0.64%				
				100.00%	0.64%				
				99.99%	0.87%				
				99.99%	1.00%				



Timeliness of Disconnects Associated with LNP Orders (Percent) (OP-17B) (Diagnostic)

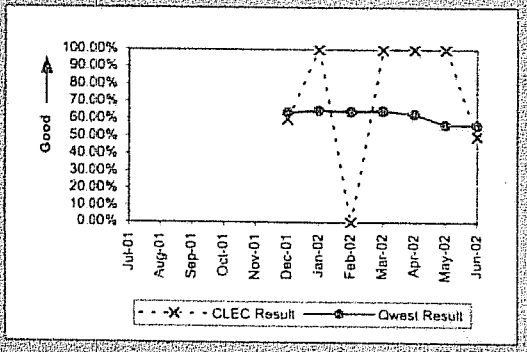
				100.00%	0.00%				
				100.00%	0.00%				
				100.00%	0.00%				
				100.00%	0.00%				
				100.00%	0.00%				
				100.00%	0.00%				
				100.00%	0.00%				



Checklist #11 - Number Portability**

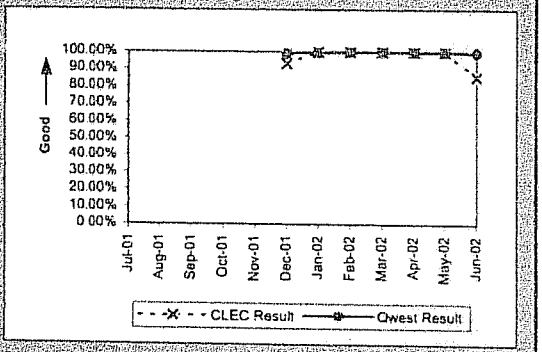
Percent Completed within 4 Hours (Percent) (MR-11A) (Parity)

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				18445	28944	63.40%	0.17	-0.9
				17587	27697	64.88%	-0.74	-1.45
				16776	26150	64.15%	2	0.22
				18282	28244	64.73%	-0.74	-1.45
				13620	21685	62.81%	-0.77	-1.47
				12815	22560	56.80%	-1.23	-1.75
				12273	21840	56.18%	0.15	-0.91



Percent Completed within 48 Hours (Percent) (MR-11B) (Parity)

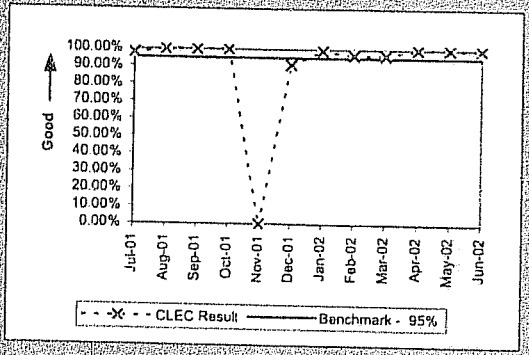
				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				49654	50188	98.94%	1.41	-0.14
				56383	56579	99.51%	-0.19	-1.11
				54018	54241	99.59%	-0.18	-1.11
				57407	57692	99.56%	-0.21	-1.13
				48175	48343	99.65%	-0.14	-1.09
				47775	47931	99.67%	-0.21	-1.13
				44312	44554	99.46%	2.08	0.26



Checklist #13 - Reciprocal Compensation

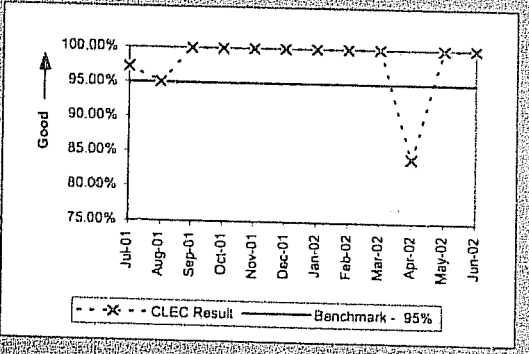
Percent Reciprocal Compensation (BI-3B) (Benchmark)

CLEC Num	CLEC Denom	CLEC Result
822658.4	840455.61	97.91%
948520.37	948520.37	100.00%
744258.68	744258.68	100.00%
740910.65	740910.65	100.00%
456917.68	745624.73	0.00%
675289.45	740610.21	91.18%
899858.68	906147.49	99.30%
750999.38	775400.12	96.85%
744429.89	770252.71	96.65%
1035003.83	1035003.83	100.00%
819223.8	819223.81	100.00%
691205.12	691205.12	100.00%



Percent Reciprocal Compensation (BI-4B) (Benchmark)

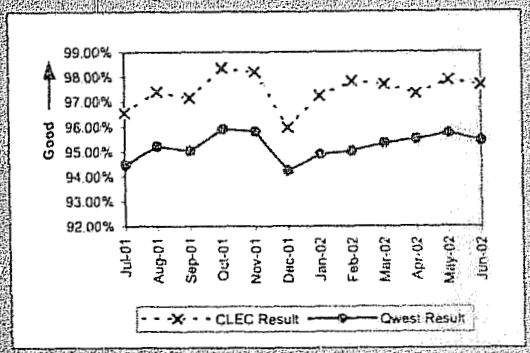
CLEC Num	CLEC Denom	CLEC Result
817205.81	840455.61	97.23%
901718.56	948520.37	95.07%
744162.49	744258.68	99.99%
740760.24	740910.65	99.98%
745576.69	745624.73	99.99%
740531.84	740610.21	99.99%
906137.05	906147.49	100.00%
775396.74	775400.12	100.00%
770247.6	770252.71	100.00%
871678.07	1035003.83	84.22%
818699.54	819223.81	99.94%
691191.09	691205.12	100.00%



Checklist #14 - Resale - Residence Installation

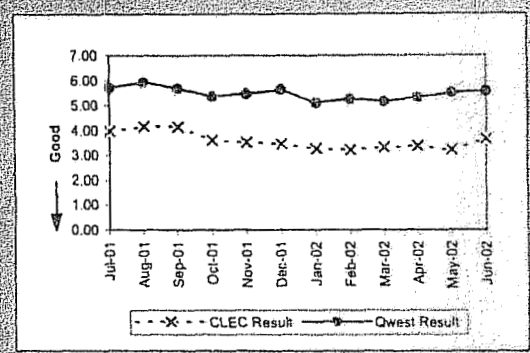
Installation Commitments Met (Percent) (OP-3A) (Parity)-- Dispatches Within MSAs

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	1121	1283	87.58%	18.19%	85254	90229	94.49%	-3.82	-3.33
	1947	2037	95.58%	15.88%	98979	103926	95.24%	-4.44	-3.7
	1562	1640	97.16%	16.60%	79780	83930	95.06%	-3.53	-3.15
	1358	1384	98.36%	12.71%	84411	88007	95.91%	-4.87	-3.96
	1351	1394	96.91%	13.26%	74760	78020	95.82%	-4.42	-3.69
	1216	1270	95.98%	19.63%	64877	68833	94.25%	-2.63	-2.6
	1503	1583	97.25%	16.36%	72327	76206	94.91%	-4.16	-3.53
	1473	1512	97.82%	14.61%	62949	65298	95.02%	-4.94	-4
	1905	1970	97.77%	14.97%	65081	68251	95.36%	-4.19	-3.55
	1284	1378	97.34%	16.09%	62075	64989	95.52%	-3.12	-2.9
	1242	1287	97.87%	14.44%	63485	66307	95.74%	-3.71	-3.26
	1364	1396	97.69%	15.02%	59189	62006	95.46%	-3.95	-3.4



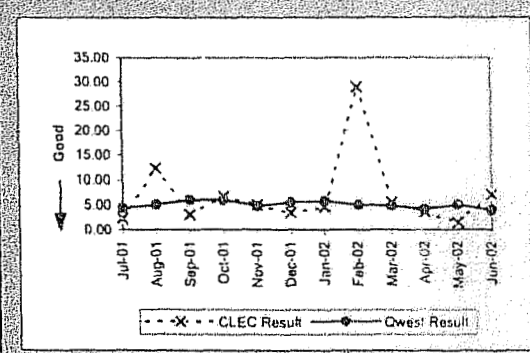
Installation Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	1716	1796	3.99	2.29	515843	90761	5.72	-9.93	-7.04
	4152	1952	4.18	3.15	624439	104869	5.95	-10.4	-7.32
	3619	1348	4.47	3.08	482040	84623	5.70	-6.95	-5.23
	2778	1596	3.62	2.46	477459	88588	5.39	-10.48	-7.37
	1827	1400	1.94	3.13	431397	78543	5.49	-11.82	-8.19
	1424	1276	3.47	2.93	391378	69246	5.65	-12.42	-8.55
	1576	1572	3.28	2.20	393456	76660	5.13	-11.28	-7.86
	1905	1516	3.23	2.59	346338	65628	5.28	-13.62	-9.28
	1709	1439	3.33	2.60	354579	68542	5.17	-13.28	-9.07
	1435	1283	3.37	2.56	347619	65312	5.32	-12.43	-8.56
	1491	1366	3.23	2.17	367737	66667	5.52	-12.9	-8.84
	1964	1383	3.67	3.04	348370	62437	5.58	-11.09	-7.74



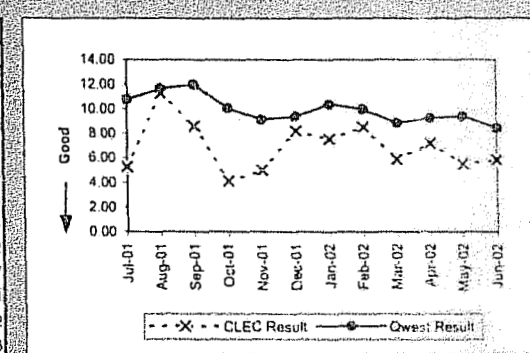
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-1) (Parity)-- Dispatches Within MSAs

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	75	34	2.29	2.33	9787	2224	4.40	-0.89	-1.54
	384	31	12.39	45.67	11004	2165	5.08	2.1	0.27
	68	22	3.09	4.79	10509	1740	6.04	-0.85	-1.51
	184	23	8.78	8.79	11523	1889	6.10	2.26	0.37
	140	32	5.03	13.39	9742	2053	4.75	1.88	0.14
	119	34	3.50	6.85	10109	1802	5.61	-0.94	-1.57
	115	25	4.60	6.16	11895	2063	5.77	-0.28	-1.17
	350	19	28.95	116.51	8348	1633	5.11	2.51	0.53
	78	14	5.57	10.90	7218	1485	4.86	0.48	-0.71
	72	20	3.60	4.82	5251	1272	4.13	-0.25	-1.15
	30	19	1.58	1.61	6224	1245	5.00	-0.78	-1.48
	150	21	7.14	14.02	5240	1320	3.96	1.64	0



Delayed Days for Facility Reasons (Average Days) (OP-6B-1) (Parity)-- Dispatches Within MSAs

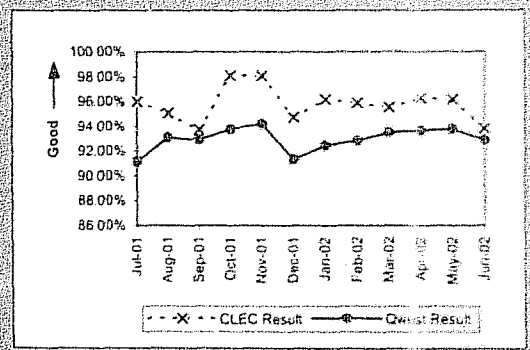
	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	163	31	5.26	3.08	33451	3099	10.79	-1.35	-1.82
	236	21	11.33	10.58	36596	3136	11.67	-0.06	-1.04
	155	16	8.81	10.20	32823	2733	12.01	-0.5	-1.31
	37	9	4.11	5.53	21972	2177	10.09	-0.92	-1.56
	15	3	5.00	3.00	15821	1733	9.13	-0.48	-1.29
	156	19	8.21	6.29	21129	2252	9.38	-0.46	-1.28
	151	20	7.55	6.77	19809	1917	10.38	-0.56	-1.34
	145	17	8.53	13.94	16802	1679	10.01	-0.37	-1.22
	113	19	5.89	6.10	15497	1747	8.87	-1.1	-1.67
	105	15	7.20	5.82	15767	1704	9.25	-0.57	-1.34
	44	8	5.50	4.00	15541	1652	9.41	-0.7	-1.42
	79	12	5.83	4.67	13014	1572	8.47	-0.43	-1.26



Checklist #14 - Resale - Residence Installation

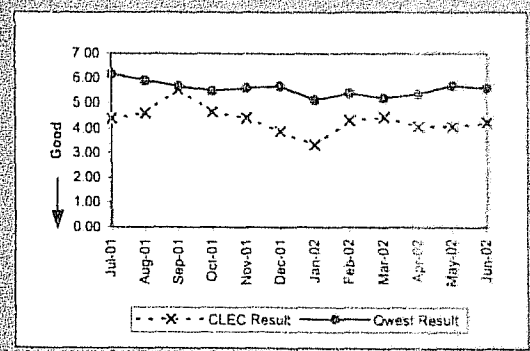
Installation Commitments Met (Percent) (OP-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	417	428	96.03%	19.53%	20075	22019	91.17%	-3.51	-3.13
[illegible]	409	430	95.12%	21.55%	24122	25901	93.13%	-1.61	-1.98
[illegible]	366	384	93.75%	24.21%	19711	21213	92.92%	-0.63	-1.38
[illegible]	427	429	98.13%	13.53%	22536	24033	93.77%	-3.71	-3.25
[illegible]	411	419	98.09%	13.69%	20063	21292	94.23%	-3.36	-3.04
[illegible]	385	420	94.76%	22.28%	16718	18304	91.34%	-2.47	-2.5
[illegible]	410	429	96.19%	19.14%	17908	19372	92.44%	-3.13	-2.9
[illegible]	353	368	95.92%	19.77%	15498	16690	92.86%	-2.26	-2.37
[illegible]	363	382	95.55%	20.62%	17171	18359	93.53%	-1.59	-1.97
[illegible]	390	405	96.30%	18.89%	16633	17755	93.68%	-2.14	-2.3
[illegible]	405	421	96.20%	19.12%	17984	19174	93.79%	-2.02	-2.23
[illegible]	477	502	93.82%	24.07%	16537	17794	92.94%	-0.77	-1.47



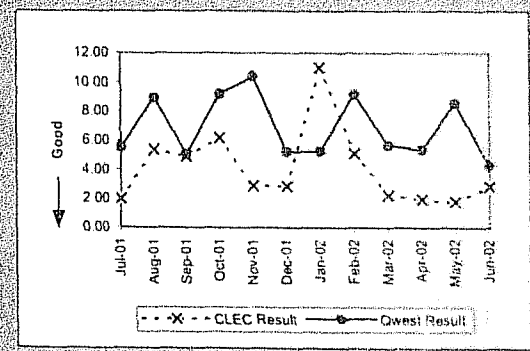
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	1905	434	4.39	4.28	136582	22183	6.16	-2.44	-2.49
[illegible]	2010	435	4.62	4.10	154406	26137	5.91	-2.47	-2.5
[illegible]	2162	389	5.56	5.03	121768	21406	5.69	-0.27	-1.16
[illegible]	2020	435	4.66	3.83	133129	24201	5.50	-1.45	-1.88
[illegible]	1889	425	4.44	3.37	120038	21411	5.61	-1.97	-2.2
[illegible]	1843	421	3.91	2.88	104676	18424	5.68	-2.69	-2.64
[illegible]	1683	502	3.35	3.29	100227	19481	5.14	-3.21	-2.95
[illegible]	1601	370	4.33	8.66	90658	16780	5.40	-1.26	-1.77
[illegible]	1730	382	4.45	13.24	95858	18450	5.20	-1.2	-1.73
[illegible]	1606	400	4.10	4.16	96065	17855	5.38	-3.3	-3.01
[illegible]	1730	424	4.08	4.33	109845	19266	5.70	-2.67	-2.62
[illegible]	2152	506	4.25	3.22	100212	17939	5.59	-4.26	-3.59



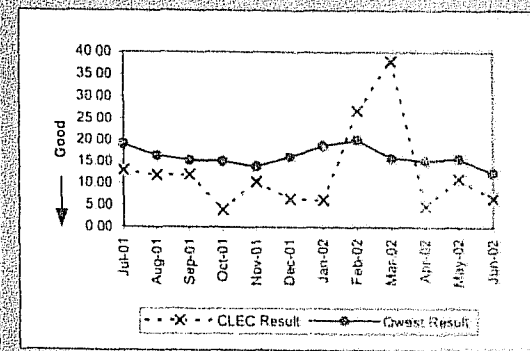
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	14	7	2.00	2.16	3646	659	5.53	-0.39	-1.24
[illegible]	78	13	6.38	6.23	5183	581	8.92	-0.32	-1.19
[illegible]	79	16	4.94	5.30	2332	460	5.07	-0.05	-1.03
[illegible]	31	5	6.20	8.32	5310	576	9.22	-0.16	-1.1
[illegible]	26	9	2.89	2.67	5160	496	10.40	-0.41	-1.25
[illegible]	29	10	2.90	1.91	3342	637	5.25	-0.41	-1.25
[illegible]	110	10	11.00	14.34	3385	641	5.28	1.41	-0.15
[illegible]	36	7	5.14	5.15	4884	531	9.20	-0.27	-1.17
[illegible]	18	8	2.25	1.39	2643	465	5.68	-0.36	-1.22
[illegible]	8	4	2.00	1.15	2150	398	5.40	-0.36	-1.22
[illegible]	11	6	1.83	0.75	3733	436	8.56	-0.31	-1.19
[illegible]	49	17	2.88	2.03	1842	427	4.31	-0.64	-1.39



Delayed Days for Facility Reasons (Average Days) (OP-6B-2) (Parity)-- Dispatches Outside MSAs

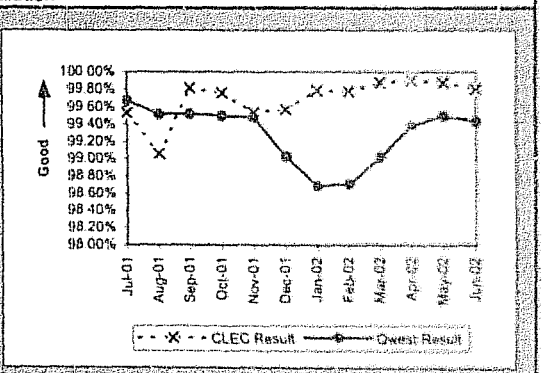
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	169	13	13.00	11.28	26254	1378	19.05	-0.43	-1.26
[illegible]	107	9	11.89	17.00	21126	1287	16.41	-0.46	-1.28
[illegible]	133	11	12.09	14.29	17464	1141	15.31	-0.38	-1.23
[illegible]	16	4	4.00	4.08	15912	1054	15.10	-0.58	-1.35
[illegible]	52	5	10.40	5.41	11867	852	13.93	-0.3	-1.18
[illegible]	77	12	6.42	5.30	15679	972	16.13	-0.68	-1.42
[illegible]	56	9	6.22	8.53	16113	857	18.80	-0.68	-1.41
[illegible]	268	10	26.80	42.51	13848	689	20.10	1.2	-0.27
[illegible]	342	9	38.00	80.57	11673	736	15.86	1.91	0.16
[illegible]	52	11	4.73	2.87	11292	743	15.20	-1.54	-1.94
[illegible]	111	10	11.10	15.75	12045	765	15.75	-0.39	-1.24
[illegible]	99	15	6.60	6.92	10536	839	12.56	-1.19	-1.72



Checklist #14 - Resale - Residence Installation

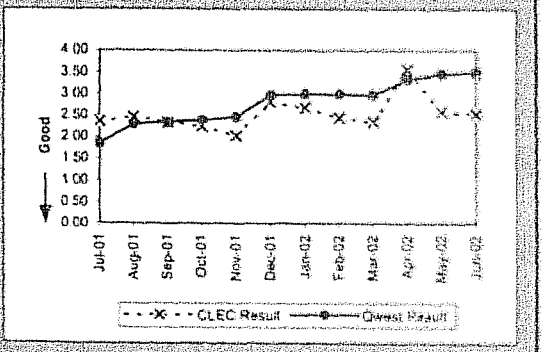
Installation Commitments Met (Percent) (OP-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	9552	9597	99.53%	6.83%	536366	538103	99.68%	2.5	0.52
Aug-01	13187	13312	99.06%	9.64%	234817	235953	99.52%	7.42	3.51
Sep-01	8228	8243	99.82%	4.26%	179781	180645	99.52%	-3.81	-3.32
Oct-01	10916	10944	99.76%	4.87%	181802	182720	99.50%	-3.81	-3.31
Nov-01	11527	11581	99.53%	6.81%	162926	163779	99.48%	-0.79	-1.48
Dec-01	13058	13114	99.57%	6.52%	136407	137746	99.03%	-6.08	-4.7
Jan-02	18499	18537	99.80%	4.52%	154617	156679	98.68%	-12.55	-8.63
Feb-02	10082	10104	99.78%	4.66%	142231	144090	98.71%	-9.23	-6.61
Mar-02	11920	11943	99.88%	3.42%	156585	158133	99.02%	-9.22	-6.61
Apr-02	10964	10974	99.91%	3.02%	158482	159452	99.39%	-6.74	-5.1
May-02	11056	11069	99.88%	3.43%	179263	180172	99.50%	-5.58	-4.39
Jun-02	9515	9533	99.81%	4.34%	170620	171575	99.44%	-4.7	-3.86



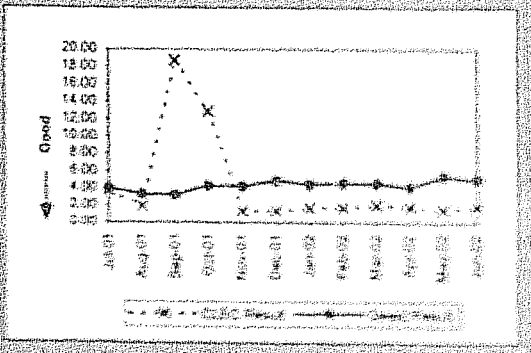
Installation Interval (Average Days) (OP-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	16973	7158	2.36	1.22	717464	387045	1.85	32.2	18.57
Aug-01	20503	8356	2.47	0.84	354067	153656	2.30	9.56	4.81
Sep-01	12091	5192	2.33	1.03	292791	124971	2.34	-0.7	-1.42
Oct-01	14922	6645	2.25	1.12	296943	124729	2.38	-7.14	-5.34
Nov-01	15024	7412	2.03	0.99	271396	110540	2.46	-29.93	-19.2
Dec-01	20565	7124	2.91	1.00	307001	103278	2.97	-8.21	-5.99
Jan-02	20535	7689	2.65	1.00	368263	122775	3.00	-15.01	-10.13
Feb-02	17705	7032	2.45	0.83	325378	108738	2.99	-27.25	-17.57
Mar-02	15459	6549	2.36	0.89	339444	113993	2.98	-27.21	-17.54
Apr-02	21021	5966	3.57	3.15	376335	112778	3.34	12.32	6.49
May-02	18254	6336	2.58	0.96	430866	124550	3.46	-51.45	-32.28
Jun-02	16778	6176	2.54	0.81	414523	118398	3.50	-48.78	-30.66



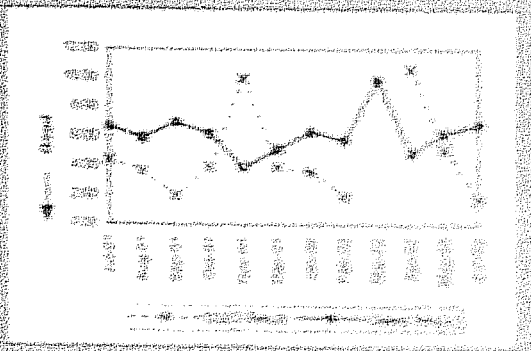
Installation Duration for Non-Facility Reasons (Average Days) (OP-5A-3) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	2	2	1.00	0.00	7464	1871	4.00	-2.15	-1.1
Aug-01	3	3	1.00	0.00	4078	1090	3.74	-1.24	-1.76
Sep-01	3	3	1.00	0.00	2939	957	3.07	2.2	0.34
Oct-01	3	3	1.00	0.00	4584	1055	4.34	-1.91	-0.16
Nov-01	1	1	1.00	0.00	3121	970	4.25	-1.15	-1.71
Dec-01	1	1	1.00	0.00	5291	1185	4.46	-1.55	-1.94
Jan-02	1	1	1.00	0.00	5991	1385	4.33	-2.85	-1.55
Feb-02	1	1	1.00	0.00	4584	1055	4.34	-1.74	-1.09
Mar-02	2	2	1.00	0.00	5121	1170	4.38	-2.79	-1.45
Apr-02	1	1	1.00	0.00	3121	970	4.25	-1.15	-1.71
May-02	1	1	1.00	0.00	4584	1055	4.34	-1.91	-0.16
Jun-02	1	1	1.00	0.00	4584	1055	4.34	-1.91	-0.16



Installation Duration for Facility Reasons (Average Days) (OP-5A-4) (Parity)-- No Dispatches

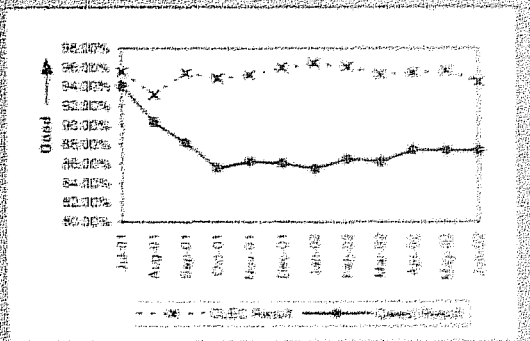
Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Aug-01	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Sep-01	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Oct-01	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Nov-01	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Dec-01	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Jan-02	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Feb-02	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Mar-02	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Apr-02	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
May-02	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00
Jun-02	1	1	1.00	0.00	1722	1722	1.00	0.00	0.00



Checklist #14 - Resale - Residence Installation

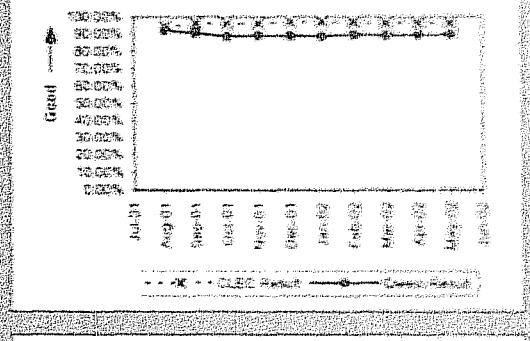
New Service Installation Quality (Percent) (OP-5) (Parity)

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
			95.56%	20.50%	715505	750661	94.06%	-7.99	-5.96
			93.17%	25.22%	468513	509795	90.33%	-11.10	-7.76
			95.46%	20.53%	309244	327933	88.20%	-25	-16.2
			94.67%	22.06%	249597	291733	85.56%	-27.85	-17.93
			95.25%	21.27%	241437	279860	86.27%	-29.29	-16.81
			85.99%	16.82%	210622	244754	86.05%	-33.13	-21.14
			90.49%	18.41%	204630	239332	85.50%	-40.28	-25.37
			96.14%	19.35%	207486	239844	86.50%	-34.73	-22.13
			95.27%	21.22%	205363	235915	86.20%	-29.07	-18.69
			95.47%	20.79%	210401	243963	87.47%	-27.07	-17.46
			95.60%	20.50%	220338	254445	87.36%	-27.25	-17.56
			96.46%	22.87%	226306	259104	87.34%	-23.01	-14.98



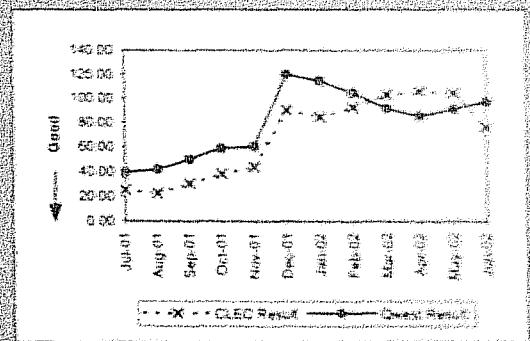
New Service Installation Quality (Percent) (OP-5) (Parity)

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
			94.54%	22.72%	472696	509795	92.73%	-9.51	-6.54
			96.47%	18.46%	297084	323933	91.71%	-22.38	-14.8
			95.64%	19.73%	258868	291733	88.73%	-23.96	-15.57
			96.34%	18.78%	249569	279860	89.19%	-25.52	-16.51
			96.90%	17.30%	218363	244754	89.22%	-29.62	-18.4
			97.38%	15.99%	213020	239332	89.01%	-34.36	-21.89
			96.99%	17.07%	215635	239844	89.91%	-29.07	-18.65
			96.38%	18.67%	211006	235915	89.44%	-24.96	-16.18
			96.46%	18.50%	219355	243963	89.93%	-24.31	-15.79
			96.49%	18.50%	226245	254445	89.72%	-24.44	-15.86



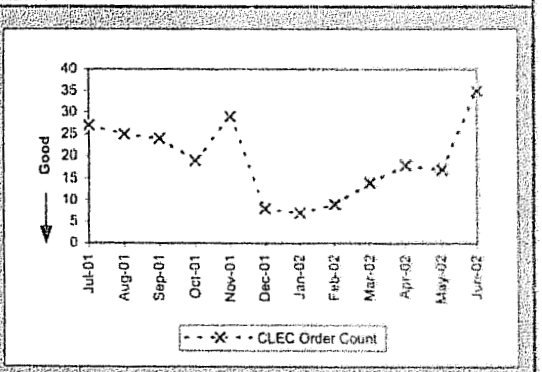
Interval for Provisioning Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
		90	25.52	36.01	350936	8909	39.39	-2.11	-2.29
		131	23.76	29.46	455054	10847	41.95	-3.45	-3.1
		178	30.53	30.33	517125	10311	50.15	-3.04	-2.85
		119	38.42	40.17	568664	9575	58.78	-2.62	-2.59
		124	44.24	45.82	567838	11050	60.44	-2.15	-2.31
		95	90.06	83.75	861548	7164	120.26	-1.99	-2.21
		97	84.62	76.68	781911	6816	114.72	-2.06	-2.27
		100	92.25	83.01	694774	6645	104.56	-0.92	-1.56
		139	103.03	89.23	742139	8132	91.26	0.95	-0.42
		117	105.98	99.42	756439	8869	85.29	1.91	0.16
		115	104.52	114.64	825459	9097	90.74	1.14	-0.31
		105	75.99	115.45	912540	9393	97.15	-1.97	-2.2



Checklist #14 - Resale - Residence Installation

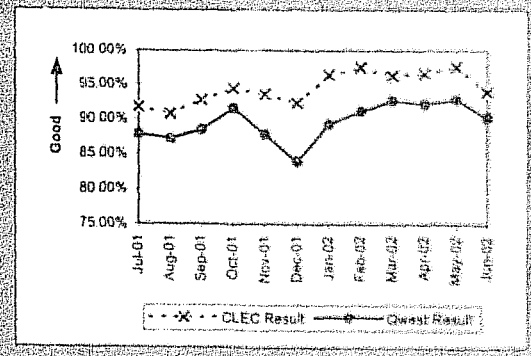
Count of Pending Orders Delayed for Facilities Reasons Residence (OP-15B) (Diagnostic)	
Date	CLEC Order Count
Jul-01	27
Aug-01	25
Sep-01	24
Oct-01	19
Nov-01	29
Dec-01	8
Jan-02	7
Feb-02	9
Mar-02	14
Apr-02	18
May-02	17
Jun-02	35



Checklist #14 - Resale - Residence Repair

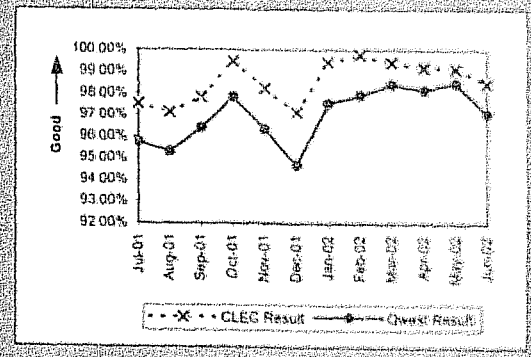
Out of Service Cleared within 24 hours (Percent) (MR-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	1428	1556	91.77%	27.46%	100786	114743	87.84%	-4.72	-3.87
Aug-01	1568	1726	90.85%	28.84%	100725	115603	87.13%	-4.58	-3.78
Sep-01	1091	1175	92.85%	25.76%	77474	87480	88.56%	-4.59	-3.79
Oct-01	981	1038	94.51%	22.78%	76964	84013	91.61%	-3.35	-3.04
Nov-01	858	916	93.67%	24.35%	68627	78159	87.80%	-5.39	-4.28
Dec-01	723	783	92.34%	26.60%	61117	72849	83.90%	-6.39	-4.89
Jan-02	677	702	96.44%	18.53%	57100	63972	89.26%	-6.11	-4.72
Feb-02	646	662	97.58%	15.36%	49698	54509	91.17%	-5.78	-4.51
Mar-02	691	717	96.37%	18.69%	54764	59084	92.69%	-3.77	-3.29
Apr-02	841	870	96.67%	17.95%	60040	65134	92.18%	-4.9	-3.98
May-02	907	929	97.63%	15.21%	64905	69899	92.86%	-5.62	-4.41
Jun-02	1063	1131	93.99%	23.77%	69085	76600	90.19%	-4.26	-3.59



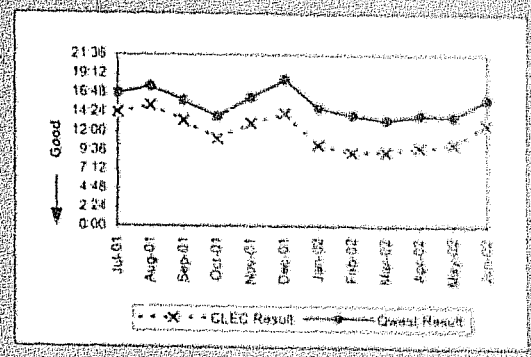
All Troubles Cleared within 48 hours (Percent) (MR-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	1858	1905	97.53%	15.51%	146768	153283	95.75%	-3.83	-3.33
Aug-01	2115	2177	97.15%	16.63%	150649	158054	95.31%	-4.03	-3.45
Sep-01	1456	1488	97.85%	14.51%	116064	120382	96.41%	-2.96	-2.6
Oct-01	1331	1338	99.48%	7.21%	114349	116853	97.86%	-4.07	-3.47
Nov-01	1161	1202	98.25%	13.10%	105177	109166	96.35%	-3.5	-3.13
Dec-01	989	1018	97.15%	16.64%	96922	102349	94.70%	-3.48	-3.11
Jan-02	901	906	99.45%	7.41%	87997	90197	97.56%	-3.66	-3.23
Feb-02	816	818	99.76%	4.94%	73654	75215	97.92%	-3.65	-3.22
Mar-02	884	889	99.44%	7.48%	78920	80185	98.42%	-2.42	-2.47
Apr-02	1115	1124	99.20%	8.91%	87689	89309	98.19%	-2.53	-2.54
May-02	1161	1171	99.15%	9.20%	93489	94911	98.50%	-1.8	-2.1
Jun-02	1359	1380	98.48%	12.24%	98550	101514	97.08%	-3.06	-2.86



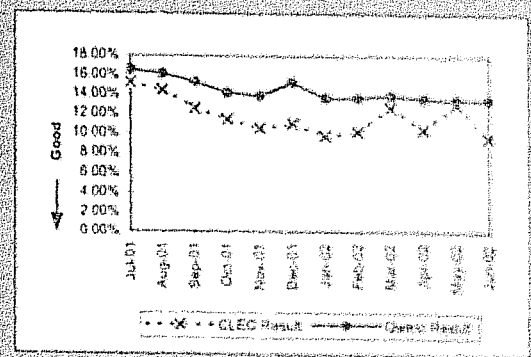
Mean Time to Restore (Hours:Minutes) (MR-6A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	27411:06	1905	14:23	13:41	2570424:49	153283	16:46	-5.85	-4.56
Aug-01	33255:46	2177	15:17	14:36	2786428:24	158054	17:38	-4.73	-3.87
Sep-01	19958:07	1488	13:25	12:22	1914737:36	120382	15:54	-5.93	-4.51
Oct-01	14944:28	1338	11:10	10:29	1622337:49	116853	13:53	-6.51	-4.96
Nov-01	15769:06	1202	13:07	12:31	1778701:11	109166	16:18	-5.97	-4.63
Dec-01	14509:47	1018	14:15	23:47	1889602:39	102349	18:28	-6.11	-4.72
Jan-02	9333:10	906	10:18	13:07	1353434:49	90197	15:00	-9.5	-6.78
Feb-02	7742:09	818	9:28	8:53	1059609:03	75215	14:05	-9.28	-6.64
Mar-02	8452:04	889	9:30	9:31	1079929:05	80185	13:28	-9	-6.47
Apr-02	11279:28	1124	10:02	10:39	1258319:08	89309	14:05	-9.35	-6.68
May-02	12228:50	1171	10:27	13:04	1320828:33	94911	13:55	-8.96	-6.45
Jun-02	17880:41	1380	12:57	13:02	1626951:14	101514	16:02	-7.82	-5.75



Repair Repeat Report Rate (Percent) (MR-7A) (Parity)-- Dispatches Within MSAs

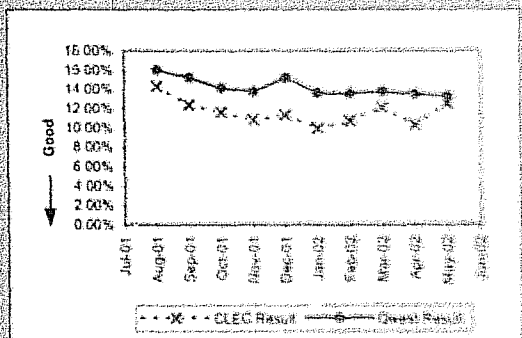
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	301	1975	15.24%	35.94%	26401	159248	16.58%	-1.59	-1.97
Aug-01	329	2271	14.49%	35.20%	26535	164971	16.15%	-2.13	-2.3
Sep-01	195	1542	12.65%	33.24%	19195	125158	15.34%	-2.91	-2.77
Oct-01	161	1396	11.53%	31.94%	17318	121534	14.25%	-2.09	-2.76
Nov-01	132	1247	10.59%	30.77%	15756	113332	13.90%	-3.37	-3.05
Dec-01	117	1056	11.06%	31.36%	16341	106883	15.29%	-3.8	-3.31
Jan-02	92	935	9.84%	29.78%	12846	93776	13.70%	-3.41	-3.08
Feb-02	86	840	10.24%	30.31%	10658	77907	13.68%	-2.89	-2.76
Mar-02	116	908	12.78%	33.38%	11566	82859	13.96%	-1.02	-1.62
Apr-02	121	1154	10.49%	30.64%	12563	92063	13.65%	-3.11	-2.89
May-02	157	1199	13.09%	33.73%	13213	97753	13.52%	-0.43	-1.26
Jun-02	138	1429	9.66%	29.54%	14224	104644	13.59%	-4.31	-3.62



Checklist #14 - Resale - Residence Repair

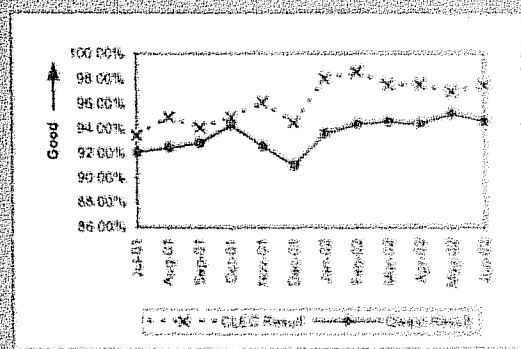
Repair Repeat Report Rate (Percent) (MR-7A*) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	294	2046	14.37%	35.08%	23731	147815	16.05%	-2.06	-2.25
Sep-01	174	1404	12.39%	32.95%	17149	112540	15.24%	-2.95	-2.79
Oct-01	149	1279	11.65%	32.08%	15369	108762	14.13%	-2.53	-2.54
Nov-01	123	1135	10.84%	31.08%	14051	101908	13.79%	-2.87	-2.74
Dec-01	110	969	11.35%	31.72%	14579	95816	15.22%	-3.33	-3.03
Jan-02	84	843	9.96%	29.95%	11444	83926	13.64%	-3.09	-2.88
Feb-02	82	763	10.75%	30.97%	9522	70242	13.56%	-2.25	-2.37
Mar-02	104	857	12.14%	32.65%	10470	75925	13.79%	-1.4	-1.85
Apr-02	113	1096	10.31%	30.41%	11615	86042	13.50%	-3.07	-2.87
May-02	142	1131	12.56%	33.13%	12247	91965	13.32%	-0.75	-1.46
Jun-02									



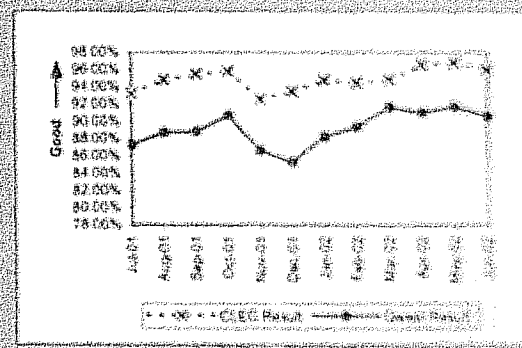
Repair Appointments Met (Percent) (MR-9A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	1846	1975	93.47%	24.71%	146641	159248	92.08%	-2.27	-2.38
Aug-01	2157	2271	94.98%	21.84%	152586	164971	92.49%	-4.47	-3.72
Sep-01	1451	1542	94.10%	23.57%	116173	125158	92.82%	-1.93	-2.17
Oct-01	1326	1396	94.99%	21.82%	114585	121534	94.28%	-1.13	-1.68
Nov-01	1199	1247	96.15%	19.24%	104931	113332	92.59%	-4.78	-3.9
Dec-01	1000	1058	94.52%	22.76%	97343	106883	91.07%	-3.91	-3.38
Jan-02	917	935	98.07%	13.74%	87793	93776	93.62%	-5.55	-4.37
Feb-02	828	840	98.57%	11.87%	73545	77907	94.40%	-5.23	-4.18
Mar-02	886	908	97.58%	15.38%	78404	82859	94.62%	-3.92	-3.33
Apr-02	1126	1154	97.57%	15.39%	86915	92063	94.41%	-4.55	-3.83
May-02	1163	1199	97.00%	17.07%	93119	97753	95.26%	-2.81	-2.71
Jun-02	1393	1429	97.48%	15.67%	98996	104644	94.60%	-4.78	-3.91



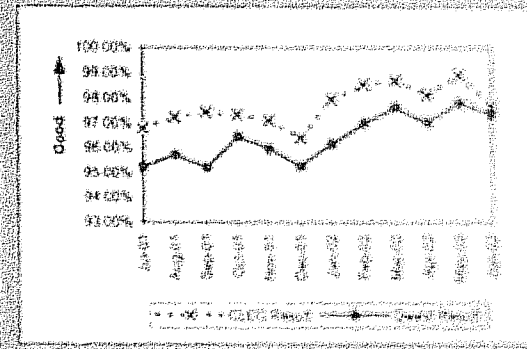
Out of Service Cleared within 24 hours (Percent) (MR-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	276	296	93.24%	25.10%	27781	31824	87.30%	-3.06	-2.86
Aug-01	387	408	94.85%	22.10%	28110	31679	88.73%	-3.88	-3.36
Sep-01	274	287	95.47%	20.80%	21066	23712	88.84%	-3.55	-3.16
Oct-01	256	267	95.88%	19.87%	19999	22040	90.74%	-2.88	-2.75
Nov-01	251	271	92.62%	26.14%	17846	20598	86.64%	-2.87	-2.75
Dec-01	217	232	93.53%	24.59%	15434	18085	85.34%	-3.51	-3.13
Jan-02	237	250	94.80%	22.20%	13816	15650	88.28%	-3.18	-2.93
Feb-02	195	201	94.53%	22.74%	12467	13941	89.43%	-2.33	-2.42
Mar-02	204	215	94.88%	22.03%	14235	15524	91.70%	-1.68	-2.02
Apr-02	285	295	96.61%	18.10%	16980	18647	91.06%	-3.31	-3.02
May-02	340	351	96.87%	17.42%	18279	19911	91.80%	-3.43	-3.08
Jun-02	461	480	96.04%	19.50%	21246	23456	90.58%	-4.06	-3.47



All Troubles Cleared within 48 hours (Percent) (MR-4B) (Parity)-- Dispatches Outside MSAs

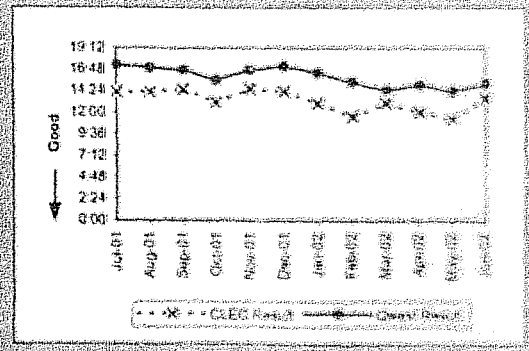
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	394	407	96.81%	17.58%	41292	43350	95.25%	-1.47	-1.89
Aug-01	532	547	97.26%	16.33%	42089	43959	95.75%	-1.74	-2.05
Sep-01	383	393	97.46%	15.75%	31501	33077	95.24%	-2.05	-2.25
Oct-01	370	380	97.37%	16.01%	30438	31547	96.48%	-0.93	-1.57
Nov-01	373	384	97.14%	16.68%	28471	29663	95.98%	-1.14	-1.7
Dec-01	325	337	96.44%	18.53%	24982	26214	95.30%	-0.98	-1.6
Jan-02	340	347	97.98%	14.05%	22447	23336	96.19%	-1.73	-2.05
Feb-02	273	277	98.56%	11.93%	19373	19972	97.00%	-1.51	-1.92
Mar-02	305	309	98.71%	11.30%	21478	21998	97.64%	-1.23	-1.75
Apr-02	419	427	98.13%	13.56%	25282	26050	97.05%	-1.3	-1.79
May-02	465	470	98.94%	10.26%	26876	27471	97.83%	-1.63	-1.99
Jun-02	596	610	97.70%	14.97%	30378	31194	97.38%	-0.49	-1.3



Checklist #14 - Resale - Residence Repair

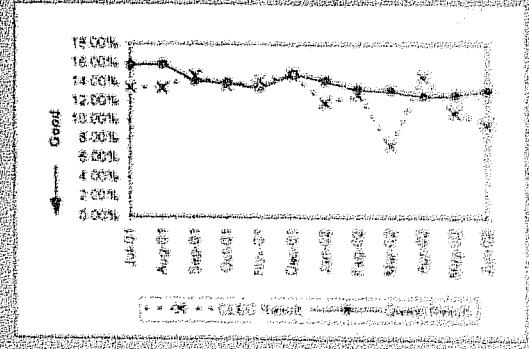
Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	5803:36	407	14:16	13:19	750116:52	43350	17:18	-3.21	-2.95
Aug-01	7797:44	547	14:15	12:44	743575:01	43959	16:55	-3.42	-3.08
Sep-01	5710:07	393	14:32	12:13	553449:36	33077	16:44	-2.3	-2.4
Oct-01	4992:11	380	13:08	13:01	492157:48	31547	15:36	-2.46	-2.49
Nov-01	5619:06	384	14:38	13:16	495193:41	29663	16:42	-2.44	-2.48
Dec-01	4038:02	337	14:21	12:49	449659:20	26214	17:09	-2.9	-2.76
Jan-02	4524:11	347	13:02	15:19	381807:35	23336	16:22	-3.39	-3.06
Feb-02	3203:56	277	11:34	10:37	307052:14	19972	15:22	-3.62	-3.2
Mar-02	4044:32	309	13:05	10:50	318666:54	21998	14:29	-0.99	-1.6
Apr-02	5183:08	427	12:05	10:53	392790:22	26050	15:05	-3.46	-3.11
May-02	5326:20	470	11:20	9:56	394390:06	27471	14:21	-4.52	-3.75
Jun-02	8270:43	610	13:34	11:38	472254:42	31194	15:08	-2.67	-2.62



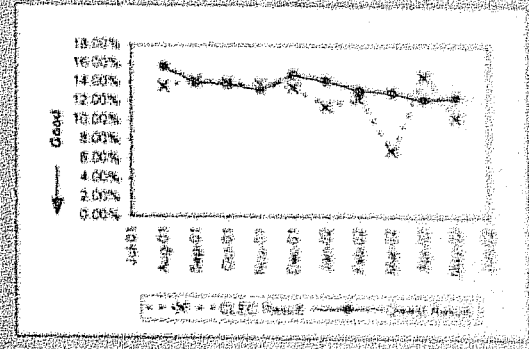
Repair Repeat Report Rate (Percent) (MR-7B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	56	415	13.49%	34.17%	7024	44356	15.84%	-1.3	-1.79
Aug-01	75	557	13.47%	34.13%	7223	45350	15.93%	-1.58	-1.96
Sep-01	59	399	14.79%	35.50%	4805	33838	14.20%	0.35	-0.79
Oct-01	53	387	13.70%	34.38%	4513	32276	13.98%	-0.15	-1.1
Nov-01	56	391	14.32%	35.03%	4074	30328	13.43%	0.52	-0.68
Dec-01	51	344	14.83%	35.54%	4030	26905	14.98%	-0.08	-1.05
Jan-02	42	352	11.93%	32.42%	3404	23908	14.24%	-1.23	-1.85
Feb-02	36	283	12.72%	33.32%	2726	20425	13.35%	-0.31	-1.15
Mar-02	23	314	7.32%	26.05%	2956	22448	13.17%	-3.04	-2.55
Apr-02	63	430	14.65%	35.36%	3345	26493	12.63%	1.24	-0.24
May-02	52	481	10.81%	31.05%	3552	27988	12.69%	-1.23	-1.15
Jun-02	59	619	9.53%	29.37%	4204	31812	13.22%	-2.68	-2.62



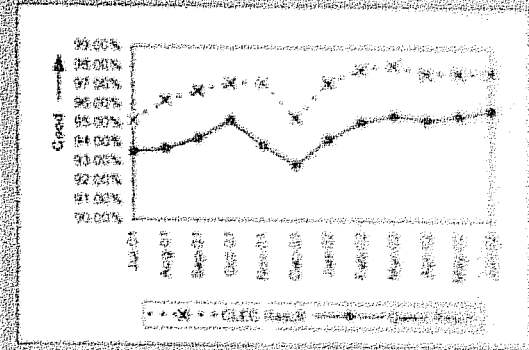
Repair Repeat Report Rate (Percent) (MR-7B*) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	66	484	13.64%	34.32%	6293	40085	15.70%	-1.74	-1.75
Sep-01	50	351	14.25%	34.95%	4227	30136	14.03%	0.13	-0.92
Oct-01	47	334	14.07%	34.77%	3969	28653	13.85%	0.13	-0.92
Nov-01	49	352	13.92%	34.62%	3563	26778	13.31%	0.35	-0.79
Dec-01	39	288	13.54%	34.22%	3533	23794	14.85%	-0.62	-1.38
Jan-02	35	304	11.51%	31.92%	2955	20763	14.23%	-1.35	-1.82
Feb-02	32	259	12.36%	32.91%	2392	18108	13.21%	-0.4	-1.25
Mar-02	20	288	6.94%	25.42%	2631	20223	13.01%	-3.04	-2.65
Apr-02	59	402	14.68%	35.39%	3013	24506	12.29%	1.42	-0.14
May-02	47	452	10.40%	30.52%	3254	26077	12.48%	-1.33	-1.81
Jun-02									



Repair Appointments Met (Percent) (MR-9B) (Parity)-- Dispatches Outside MSAs

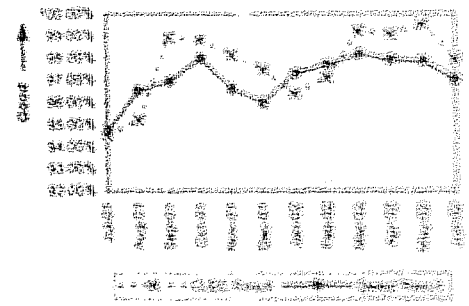
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	395	415	95.18%	21.42%	41494	44356	93.55%	-1.35	-1.82
Aug-01	536	557	96.23%	19.05%	42499	45350	93.71%	-2.43	-2.43
Sep-01	386	399	96.74%	17.75%	31891	33838	94.25%	-2.13	-2.29
Oct-01	376	387	97.16%	16.62%	30722	32276	95.19%	-1.8	-2.1
Nov-01	380	391	97.19%	16.54%	28482	30328	93.91%	-2.69	-2.64
Dec-01	328	344	95.35%	21.06%	24986	26905	92.87%	-1.78	-2.08
Jan-02	342	352	97.16%	16.61%	22525	23908	94.22%	-2.35	-2.43
Feb-02	277	283	97.88%	14.41%	19431	20425	95.13%	-2.13	-2.3
Mar-02	308	314	98.09%	13.69%	21433	22448	95.48%	-2.21	-2.34
Apr-02	420	430	97.67%	15.07%	25236	26493	95.26%	-2.34	-2.42
May-02	470	481	97.71%	14.95%	26716	27988	95.46%	-2.36	-2.43
Jun-02	605	619	97.74%	14.87%	30454	31812	95.73%	-2.45	-2.49



Checklist #14 - Resale - Residence Repair

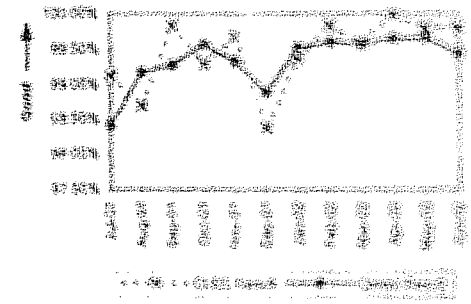
Out of Service Cleared within 24 hours (Percent) (MR-3C) (Parity)– No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	383	405	94.57%	22.67%	29684	31328	94.75%	0.2	-0.88
Aug-01	441	463	95.25%	21.27%	29037	30077	96.54%	1.46	-0.11
Sep-01	284	287	98.95%	10.17%	22765	23478	96.96%	-1.95	-2.19
Oct-01	335	339	98.82%	10.80%	26752	27302	97.99%	-1.05	-1.65
Nov-01	268	273	98.17%	13.41%	23133	23938	96.64%	-1.4	-1.85
Dec-01	273	280	97.50%	15.61%	21629	22529	96.01%	-1.27	-1.71
Jan-02	217	225	96.44%	18.52%	22687	23308	97.34%	0.84	-0.45
Feb-02	239	246	97.15%	16.63%	22318	22841	97.71%	0.61	-0.63
Mar-02	263	265	99.25%	8.65%	24292	24740	98.19%	-1.28	-1.78
Apr-02	223	225	99.11%	9.39%	18305	18690	97.95%	-1.23	-1.74
May-02	222	223	99.55%	6.68%	19105	19521	97.87%	-1.73	-2.03
Jun-02	244	249	97.99%	14.03%	18547	19115	97.03%	-0.89	-1.54



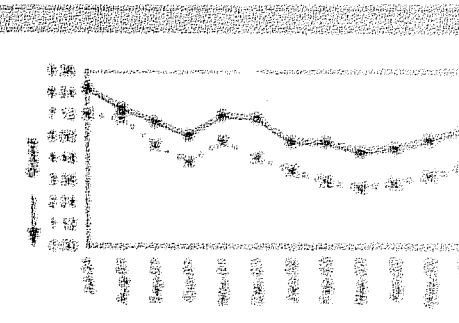
All Troubles Cleared within 48 hours (Percent) (MR-4C) (Parity)– No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	804	811	99.14%	9.25%	55590	56481	98.42%	-6.62	-5.99
Aug-01	912	924	98.70%	11.32%	55612	56078	99.17%	1.55	-0.38
Sep-01	645	646	99.85%	3.93%	43815	44134	99.28%	-1.58	-2.01
Oct-01	705	710	99.30%	8.36%	50981	51201	99.57%	1.11	-0.32
Nov-01	640	642	99.69%	5.57%	46444	46756	99.33%	-1.1	-1.58
Dec-01	609	619	98.38%	12.61%	42902	43385	98.89%	1.18	-0.28
Jan-02	633	637	99.37%	7.90%	48285	48515	99.53%	0.58	-0.06
Feb-02	640	641	99.84%	3.95%	46909	47094	99.61%	0.85	0.36
Mar-02	732	735	99.59%	6.38%	49720	49928	99.58%	0.04	-0.02
Apr-02	621	621	100.00%	0.00%	40994	41135	99.66%	0.45	0.06
May-02	520	521	99.81%	4.38%	40820	40956	99.67%	0.55	0.14
Jun-02	538	539	99.81%	4.30%	38325	38538	99.45%	-1.14	-0.65



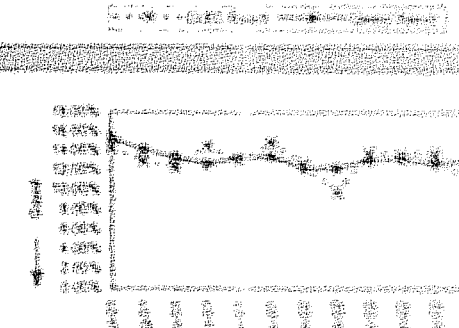
Mean Time to Restore (Hours:Minutes) (MR-6C) (Parity)– No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	5874:13	811	7:15	12:33	488734:03	56481	8:39	-5.95	-5.14
Aug-01	6504:28	924	7:02	11:26	426575:05	56078	7:36	-5.4	-4.73
Sep-01	3592:18	646	5:34	8:14	300554:55	44134	6:49	-2.68	-2.81
Oct-01	3299:24	710	4:39	7:53	312754:07	51201	6:07	-4.32	-3.85
Nov-01	3711:19	642	5:47	8:40	335327:16	46756	7:10	-5.43	-4.19
Dec-01	3020:58	619	4:53	9:43	304873:09	43385	7:02	-5.1	-4.43
Jan-02	2663:41	637	4:11	7:29	278097:05	48515	5:44	-3.8	-3.31
Feb-02	2304:31	641	3:36	7:01	268520:31	47094	5:42	-3.54	-3.46
Mar-02	2368:05	735	3:13	6:18	259169:55	49928	5:11	-3.23	-3.41
Apr-02	2156:47	621	3:28	5:54	221555:28	41135	5:23	-3.79	-4.01
May-02	2042:01	521	3:55	7:31	238662:17	40956	5:50	-4.68	-4.65
Jun-02	2351:35	539	4:22	7:12	244962:42	38538	6:21	-4.19	-3.54



Repair Repeat Report Rate (Percent) (MR-7C) (Parity)– No Dispatches

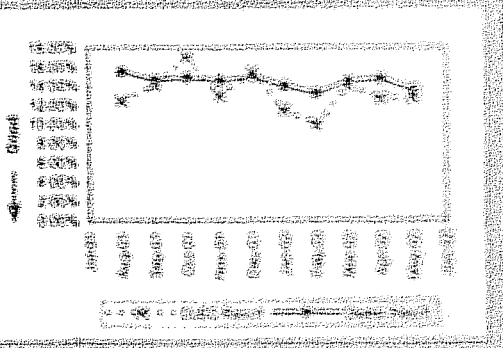
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	116	811	14.30%	35.01%	8663	56481	15.33%	0.6	-0.58
Aug-01	120	925	12.97%	33.60%	7894	56127	14.06%	-0.92	-1.58
Sep-01	80	646	12.38%	32.94%	5512	44137	12.38%	-0.75	-1.49
Oct-01	103	710	14.51%	35.22%	6495	51293	12.66%	1.42	-0.52
Nov-01	84	642	13.08%	33.72%	6211	46755	13.28%	-0.15	-1.09
Dec-01	92	619	14.86%	35.57%	5816	43385	13.41%	1.08	-0.35
Jan-02	81	637	12.72%	33.32%	5960	48515	12.28%	-0.32	-0.8
Feb-02	63	641	9.83%	29.77%	5762	47101	12.23%	-1.88	-2.12
Mar-02	102	735	13.88%	34.57%	6515	49944	13.04%	0.67	-0.2
Apr-02	85	621	13.69%	34.37%	5463	41138	13.28%	0.33	-0.4
May-02	72	521	13.82%	34.51%	5204	40956	12.71%	0.76	-0.04
Jun-02	57	540	10.56%	30.73%	5015	38538	13.01%	1.64	0.7



Checklist #14 - Resale - Residence Repair

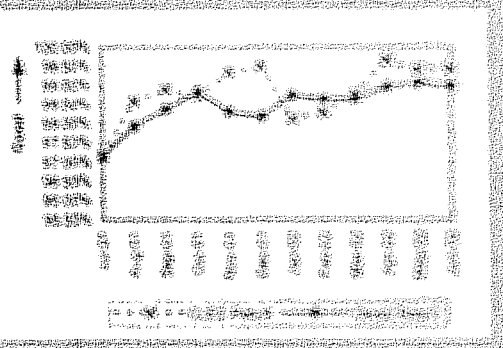
Repair Repeat Report Rate (Percent) (MR-7C*) (Parity) - No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Rate	Mod Z Stat	Parity Stat
Jul-01									
Aug-01	55	442	12.44%	33.01%	4164	28861	14.50%	-1.17	-0.07
Sep-01	39	275	14.18%	34.89%	3002	20522	14.63%	-0.21	-0.13
Oct-01	58	341	17.01%	37.57%	3329	22393	14.87%	1.1	0.33
Nov-01	37	285	12.98%	33.61%	2955	20297	14.56%	-0.75	-0.04
Dec-01	44	284	15.49%	36.18%	2693	17969	14.99%	0.25	0.05
Jan-02	32	280	11.43%	31.82%	2821	20197	13.97%	-1.22	-0.15
Feb-02	29	291	9.97%	29.95%	2510	19332	12.98%	-1.63	-0.06
Mar-02	43	307	14.01%	34.71%	3158	21768	14.50%	-0.24	-0.13
Apr-02	29	229	12.66%	33.26%	2570	17423	14.75%	-0.88	-0.14
May-02	29	227	12.78%	33.38%	2478	18249	13.58%	-0.35	-0.21
Jun-02									



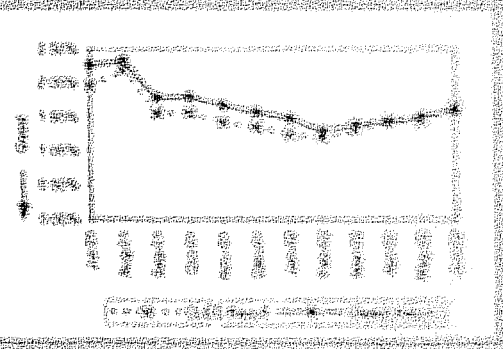
Repair Appointments Met (Percent) (MR-9C) (Parity) - No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Rate	Mod Z Stat	Parity Stat
Jul-01	788	811	97.16%	16.60%	54582	54483	97.16%	-0.01	-0.01
Aug-01	912	925	98.59%	11.77%	54968	56127	97.94%	1.1	0.66
Sep-01	639	646	98.92%	10.35%	43419	44133	98.37%	1.16	0.55
Oct-01	701	710	98.73%	11.19%	50611	51207	98.84%	0.58	0.45
Nov-01	638	642	99.38%	7.87%	45067	45758	98.51%	2.09	0.87
Dec-01	616	619	99.52%	6.94%	42591	43566	98.13%	-0.47	1.4
Jan-02	625	637	98.12%	13.60%	47900	48576	98.71%	1.38	0.59
Feb-02	630	641	98.28%	12.99%	46435	47501	98.63%	0.76	0.35
Mar-02	726	735	98.78%	11.00%	49264	49964	98.83%	0.3	0.19
Apr-02	619	621	99.68%	5.67%	40709	41138	99.69%	1.73	0.87
May-02	518	521	99.42%	7.57%	40574	40951	99.08%	-0.64	-0.42
Jun-02	537	540	99.44%	7.43%	38329	38732	98.96%	-0.5	-0.32



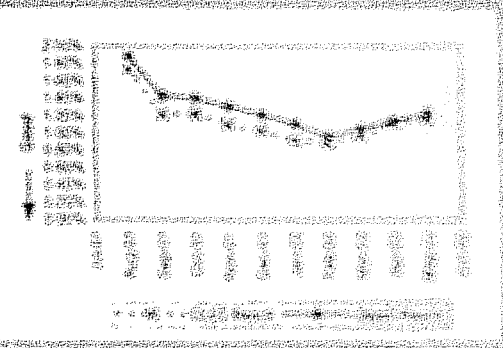
Trouble Rate (Percent) (MR-4) (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Rate	Mod Z Stat	Parity Stat
Jul-01	3201	162806	1.97%	13.88%	280693	11478244	2.21%	-6.04	-0.15
Aug-01	3753	171036	2.19%	14.65%	266448	11418511	2.33%	-5.47	-0.17
Sep-01	2587	166021	1.56%	12.39%	203133	11403648	1.78%	-6.82	-0.19
Oct-01	2493	159424	1.56%	12.41%	205013	11379523	1.80%	-7.09	-0.21
Nov-01	2280	160142	1.42%	11.85%	190418	11336459	1.68%	-7.61	-0.21
Dec-01	2021	149861	1.35%	11.53%	177173	11297861	1.57%	-8.3	-0.19
Jan-02	1924	155358	1.24%	11.06%	166290	11247317	1.48%	-8.38	-0.21
Feb-02	1764	147085	1.20%	10.89%	145401	11193539	1.30%	-8.38	-0.19
Mar-02	1957	147957	1.32%	11.42%	155251	11176531	1.39%	-8.11	-0.18
Apr-02	2205	151899	1.45%	11.96%	159694	11111203	1.44%	-6.44	-0.09
May-02	2201	153190	1.44%	11.90%	166192	11047269	1.51%	-6.31	-0.11
Jun-02	2588	155694	1.66%	12.79%	175188	10972411	1.60%	-3.94	-0.04



Trouble Rate (Percent) (MR-8*) (Parity)

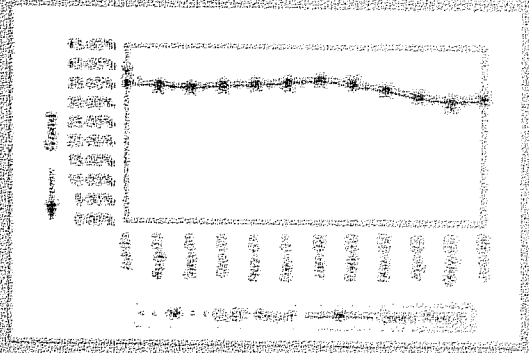
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Rate	Mod Z Stat	Parity Stat
Jul-01									
Aug-01	2972	171036	1.74%	13.07%	214761	11418511	1.88%	-4.54	-0.09
Sep-01	2030	166021	1.22%	10.99%	163192	11403648	1.43%	-5.1	-0.13
Oct-01	1954	159424	1.23%	11.00%	159808	11379523	1.40%	-5.68	-0.14
Nov-01	1772	160142	1.11%	10.46%	148983	11336459	1.31%	-7.15	-0.15
Dec-01	1541	149861	1.03%	10.09%	137579	11297861	1.22%	-8.04	-0.14
Jan-02	1427	155358	0.92%	9.54%	124886	11247317	1.11%	-9.13	-0.16
Feb-02	1313	147085	0.89%	9.41%	105082	11193539	0.94%	-9.84	-0.17
Mar-02	1452	147957	0.98%	9.86%	117934	11176531	1.06%	-9.75	-0.16
Apr-02	1727	151899	1.14%	10.66%	127971	11111203	1.15%	-8.94	-0.13
May-02	1810	153190	1.18%	10.81%	135291	11047269	1.23%	-8.64	-0.17
Jun-02									



Checklist #14 - Resale - Residence Retail

Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)

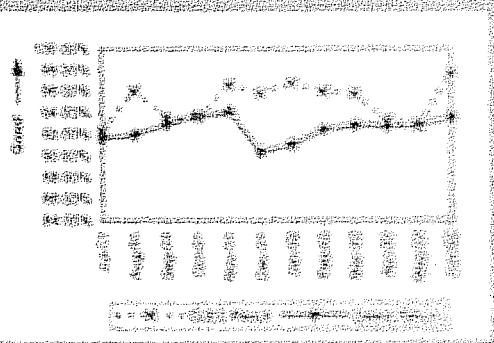
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	2002	5203	38.48%	48.65%	142213	402306	35.35%	4.60	Y
Aug-01	1951	5704	34.20%	47.44%	144296	410744	35.13%	-1.48	Y
Sep-01	1338	3925	34.09%	47.40%	107294	310337	34.57%	-0.6	Y
Oct-01	1305	3798	34.36%	47.49%	111145	316158	35.15%	-1.00	Y
Nov-01	1231	3511	35.06%	47.72%	104862	295280	35.51%	-0.84	Y
Dec-01	1084	3105	34.91%	47.67%	99899	277067	36.05%	-1.32	Y
Jan-02	1096	3020	36.29%	48.08%	96350	262756	36.67%	-0.53	Y
Feb-02	1013	2777	36.48%	48.14%	79327	224760	35.29%	1.3	Y
Mar-02	1008	2963	33.95%	47.35%	81224	236475	34.35%	-0.45	Y
Apr-02	1065	3270	32.57%	46.86%	75444	236138	31.97%	0.24	Y
May-02	952	3153	30.19%	45.91%	76430	243130	31.44%	-1.49	Y
Jun-02	1229	3817	32.20%	46.72%	81913	257101	31.86%	0.44	Y



Checklist #14 - Resale - Business Installation

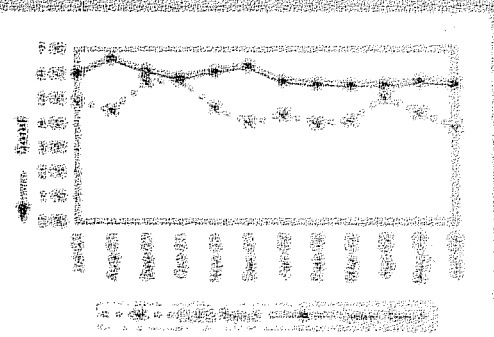
Installation Commitments Met (Percent) (OP-3A) (Parity – Dispatches Within OSAs)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Z Score	Parity Stat
Jul-01	134	145	92.41%	26.48%	16199	17684	91.60%	-0.35	
Aug-01	146	152	96.05%	19.47%	18068	19584	92.26%	-1.80	
Sep-01	132	141	93.62%	24.44%	16208	17430	92.99%	-0.35	
Oct-01	118	126	93.65%	24.38%	18396	19834	92.75%	-0.47	
Nov-01	114	118	96.61%	18.10%	15816	16815	94.06%	-1.15	
Dec-01	139	145	95.86%	19.92%	12972	14354	90.37%	-2.23	
Jan-02	122	126	96.83%	17.53%	15356	16856	91.10%	-3.15	
Feb-02	120	125	96.00%	19.60%	13944	15082	92.45%	-1.49	
Mar-02	92	96	95.83%	19.98%	14758	15925	92.67%	-1.10	
Apr-02	111	119	93.28%	25.04%	15290	16489	92.73%	-0.71	
May-02	103	111	92.79%	25.86%	15584	16785	92.84%	-0.63	
Jun-02	85	87	97.70%	14.99%	14205	15331	92.65%	-0.58	



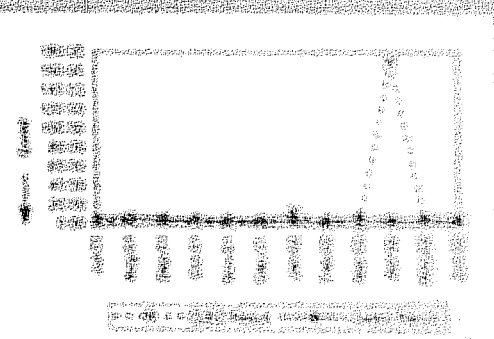
Installation Interval (Average Days) (OP-4A) (Parity – Dispatches Within OSAs)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Z Score	Parity Stat
Jul-01	722	147	4.91	4.11	108250	17871	6.06	-4.6	
Aug-01	715	156	4.58	3.19	131634	19812	6.64	-6.61	
Sep-01	814	142	5.73	6.36	108645	17823	6.09	-4.61	
Oct-01	742	128	5.80	8.20	116606	19862	5.87	-0.11	
Nov-01	558	119	4.69	4.93	104418	17662	5.91	-4.84	
Dec-01	595	146	4.08	3.16	97316	14450	6.73	-9.7	
Jan-02	569	130	4.38	4.36	97580	17023	5.73	-6.84	
Feb-02	504	125	4.03	3.95	85821	15221	5.64	-6.45	
Mar-02	403	97	4.15	3.92	89945	15759	5.71	-6.4	
Apr-02	613	120	5.11	7.46	93361	15668	5.96	-3.59	
May-02	495	111	4.46	4.18	97296	16958	5.74	-5.64	
Jun-02	342	88	3.89	2.77	89064	15429	5.77	-7.33	



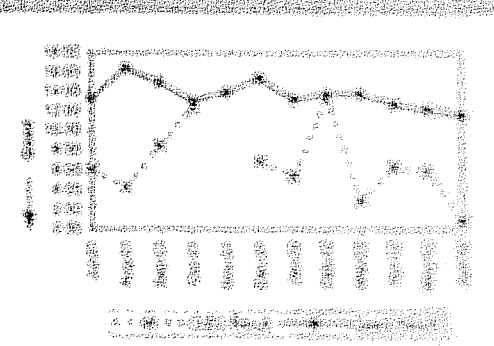
Delayed Days for Non-Facility Reasons (Average Days) (OP-4A-1) (Parity – Dispatches Within OSAs)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Z Score	Parity Stat
Jul-01	11	6	1.83	3.06	4382	706	6.21	-5.56	
Aug-01	24	6	4.00	4.29	5691	771	7.38	-4.21	
Sep-01	27	4	6.75	5.32	3557	651	5.46	1.1	
Oct-01	12	6	2.00	1.26	3790	695	5.45	-4.81	
Nov-01	10	5	2.00	1.58	3542	646	5.48	-4.3	
Dec-01	9	3	3.00	3.46	3682	734	5.02	-3.15	
Jan-02	28	2	14.00	18.38	5723	956	5.99	5.82	
Feb-02	2	2	1.00	0.00	3038	709	4.28	-4.81	
Mar-02	2	2	1.00	0.00	4923	661	7.45	-4.38	
Apr-02	512	3	170.67	293.87	3345	720	4.65	3.64	
May-02	24	6	4.00	4.15	4279	648	6.6	-4.15	
Jun-02	9	2	4.50	2.12	3183	605	5.27	-4.51	



Delayed Days for Facility Reasons (Average Days) (OP-4A-1) (Parity – Dispatches Within OSAs)

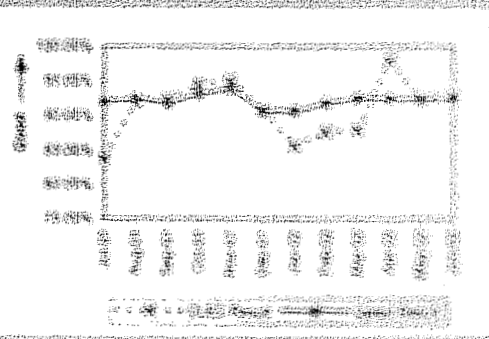
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Z Score	Parity Stat
Jul-01	43	7	6.14	3.39	10120	903	11.21	-4.91	
Aug-01	13	3	4.33	1.15	15212	829	18.35	-4.91	
Sep-01	51	6	8.50	14.47	10350	697	14.85	-0.4	
Oct-01	37	3	12.33	17.10	9581	733	13.07	-0.65	
Nov-01					8476	492	17.23		
Dec-01	21	3	7.00	3.61	7815	619	12.62	-5.75	
Jan-02	11	2	5.50	2.12	7858	991	7.93	-0.44	
Feb-02	40	3	13.33	17.21	6171	443	13.93	-0.24	
Mar-02	6	2	3.00	1.41	6584	497	13.25	-5.1	
Apr-02	32	5	6.40	6.73	6491	555	11.69	-5.22	
May-02	12	2	6.00	1.41	7101	562	12.63	-4.64	
Jun-02	1	1	1.00		4557	454	10.04	-5.47	



Checklist #14 - Resale - Business Interaction

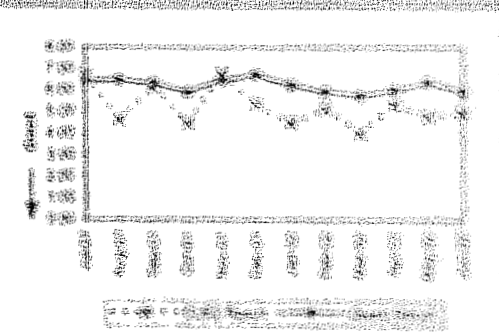
Installation Commitments Met (Percent) (OP-3) (Parity - Dispatches Outside MSA)

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Hist Z Sc	Parity Sta
Jul-01	73	87	83.91%	36.75%	4402	4783	92.03%	2.40	61
Aug-01	69	75	92.00%	27.13%	4757	5143	92.49%	0.67	61
Sep-01	62	67	92.54%	26.28%	4068	4429	91.85%	0.9	61
Oct-01	89	94	94.68%	22.44%	4584	4917	93.23%	0.56	61
Nov-01	82	86	95.35%	21.06%	3940	4191	94.01%	0.52	61
Dec-01	50	55	90.91%	28.75%	3274	3609	90.72%	0.65	61
Jan-02	48	56	85.71%	34.99%	3987	4283	93.09%	1.25	61
Feb-02	50	57	87.72%	32.82%	3646	3972	91.84%	0.9	61
Mar-02	37	42	88.10%	32.38%	3757	4058	92.58%	0.56	61
Apr-02	52	53	98.11%	13.61%	3973	4291	92.56%	0.74	61
May-02	50	54	92.59%	26.19%	4406	4758	92.61%	0.55	61
Jun-02	41	44	93.18%	25.21%	3867	4171	92.69%	0.71	61



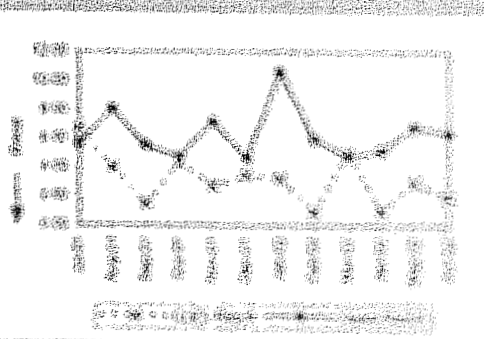
Installation Interval (Average Days) (OP-4) (Parity - Dispatches Outside MSA)

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Hist Z Sc	Parity Sta
Jul-01	593	88	6.74	7.76	31283	4853	6.45	1.63	61
Aug-01	359	77	4.66	4.81	33662	5208	6.47	-5.8	61
Sep-01	419	68	6.16	7.81	28382	4479	6.34	-0.55	61
Oct-01	439	97	4.53	4.08	29374	4900	5.99	-5.38	61
Nov-01	598	88	6.80	6.81	27381	4058	6.75	2.1	61
Dec-01	301	56	5.38	4.87	22415	3629	6.18	-4	61
Jan-02	258	57	4.53	4.87	27328	4336	6.3	-4.24	61
Feb-02	295	57	5.18	4.80	23581	3963	5.95	-3.61	61
Mar-02	170	42	4.05	4.11	22446	4065	5.52	-3.58	61
Apr-02	289	54	5.35	5.36	25041	4361	5.74	-3.53	61
May-02	261	54	4.83	4.78	32818	4852	6.76	-5.12	61
Jun-02	235	47	5.00	3.34	35504	4277	8.3	-8.61	61



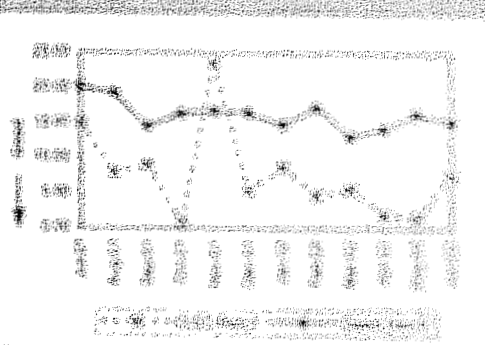
Delayed Days for Non-Facility Reasons (Average Days) (OP-5) (Parity - Dispatches Outside MSA)

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Hist Z Sc	Parity Sta
Jul-01	54	8	6.75	6.50	321	153	2.1	1.47	61
Aug-01	24	6	4.00	4.60	1453	180	8.07	-6.55	61
Sep-01	3	2	1.50	0.71	351	155	2.26	-0.53	61
Oct-01	26	6	4.33	3.44	712	156	4.56	-0.17	61
Nov-01	11	4	2.75	2.99	960	191	5.02	-4.08	61
Dec-01	7	2	3.50	0.71	610	156	3.91	-0.53	61
Jan-02	13	4	3.25	3.30	2301	255	9.02	-6.31	61
Feb-02	2	2	1.00	0.00	964	167	5.77	-4.53	61
Mar-02	10	2	5.00	0.00	736	153	4.81	-0.61	61
Apr-02	1	1	1.00		733	167	4.39	-4.01	61
May-02	6	2	3.00	2.83	1201	191	6.29	-4.07	61
Jun-02	4	2	2.00	0.00	941	183	5.14	-4.61	61



Delayed Days for Facility Reasons (Average Days) (OP-5) (Parity - Dispatches Outside MSA)

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Hist Z Sc	Parity Sta
Jul-01	90	6	15.00	14.56	3723	285	13.06	0.29	61
Aug-01	8	1	8.00		4534	234	19.38	-0.22	61
Sep-01	27	3	9.00	6.08	3483	234	14.88	-0.57	61
Oct-01	1	1	1.00		3454	208	16.6	-0.52	61
Nov-01	47	2	23.50	19.09	2832	183	15.48	0.14	61
Dec-01	16	3	5.33	5.86	3411	208	16.4	-0.3	61
Jan-02	35	4	8.75	5.85	2515	170	14.79	-0.4	61
Feb-02	24	5	4.80	4.15	2412	157	15.36	-1.16	61
Mar-02	17	3	5.67	4.62	1964	143	13.73	-0.73	61
Apr-02	2	1	2.00		2126	143	14.87	-0.67	61
May-02	3	2	1.50	0.71	2260	183	12.35	-0.29	61
Jun-02	23	3	7.67	6.66	2553	183	13.95	-0.44	61



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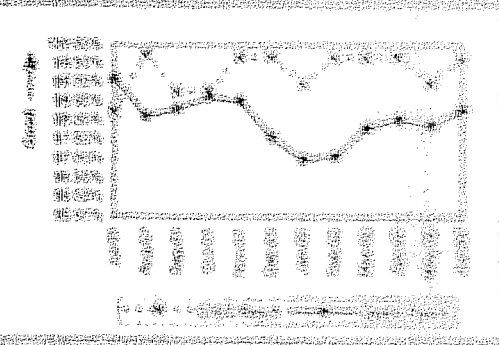
Checklist #14 - Resale - Business Migration

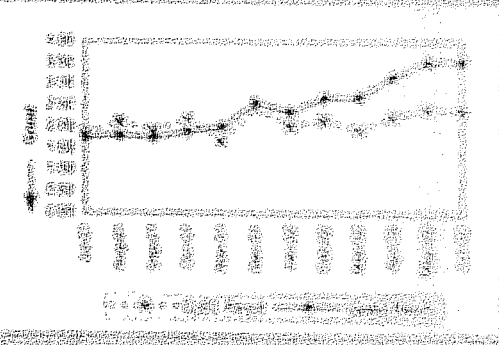
Installation Commitments Met (Percent) (CR-3) (Parity - No Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Z Score	Parity Stat
Jul-01	454	462	98.27%	13.04%	18922	19164	98.74%	1.11	0.00
Aug-01	436	437	99.77%	4.78%	5367	5408	99.24%	2.46	0.00
Sep-01	246	249	98.80%	10.91%	4043	4111	98.35%	0.98	0.00
Oct-01	580	587	98.81%	10.85%	5125	5175	99.03%	0.25	0.00
Nov-01	318	319	99.69%	5.59%	4513	4563	98.84%	1.44	0.00
Dec-01	652	654	99.69%	5.52%	4490	4552	98.64%	1.50	0.00
Jan-02	686	693	98.99%	10.00%	5263	5423	97.05%	4.39	0.00
Feb-02	602	604	99.67%	5.74%	4489	4621	97.15%	4.04	0.00
Mar-02	616	618	99.68%	5.68%	5156	5271	97.82%	2.89	0.00
Apr-02	706	708	99.72%	5.31%	5310	5443	97.56%	3.49	0.00
May-02	604	610	99.02%	9.87%	5306	5505	96.39%	5.93	0.00
Jun-02	554	556	99.64%	5.95%	4861	4931	98.58%	2.31	0.00



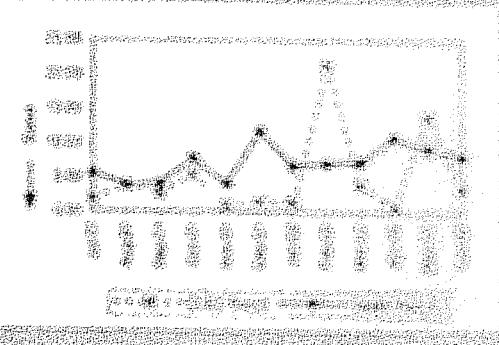
Installation Interval (Average Days) (CR-1) (Parity - No Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Z Score	Parity Stat
Jul-01	639	348	1.84	1.06	60083	54236	1.11	3.91	0.00
Aug-01	689	323	2.13	1.09	6553	5844	1.12	5.11	0.00
Sep-01	347	181	1.92	1.12	5083	4560	1.11	1.01	0.00
Oct-01	639	290	2.20	2.05	6455	5466	1.18	1.98	0.00
Nov-01	345	203	1.70	1.24	5827	5088	1.15	1.65	0.00
Dec-01	1258	511	2.46	1.56	7713	6931	1.11	6.08	0.00
Jan-02	1145	560	2.04	1.53	8140	7355	1.11	3.51	0.00
Feb-02	928	430	2.16	1.57	6883	5974	1.15	3.84	0.00
Mar-02	986	506	1.95	1.28	8477	7572	1.12	4.36	0.00
Apr-02	990	442	2.24	1.80	10268	9201	1.12	6.37	0.00
May-02	1105	457	2.42	3.60	10234	9127	1.12	4.91	0.00
Jun-02	1001	419	2.39	1.88	11056	9866	1.12	6.01	0.00



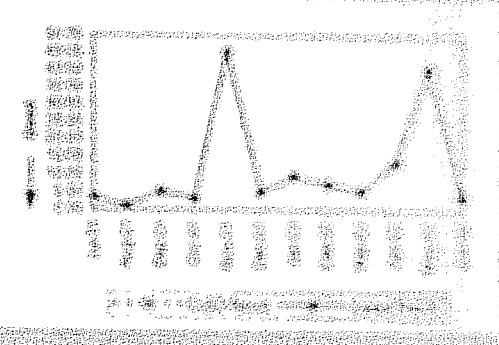
Delayed Days for Non-Facility Reasons (Average Days) (CR-4) (Parity - No Diagnostic)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Z Score	Parity Stat
Jul-01	18	9	2.00	1.32	1151	209	5.51	4.28	0.00
Aug-01	4	1	4.00		463	92	5.03	0.88	0.00
Sep-01	11	4	2.75	0.96	283	65	4.35	2.24	0.00
Oct-01	39	7	5.57	12.09	575	98	5.87	0.31	0.00
Nov-01	1	1	1.00		295	71	4.15	4.08	0.00
Dec-01	3	2	1.50	0.71	1153	91	12.67	8.03	0.00
Jan-02	10	7	1.43	1.13	1053	242	4.35	4.58	0.00
Feb-02	43	2	21.50	27.58	925	108	8.56	1.91	0.00
Mar-02	8	2	4.00	1.41	394	108	3.65	0.41	0.00
Apr-02	2	2	1.00	0.00	1334	99	13.47	9.41	0.00
May-02	84	6	14.00	29.85	999	138	7.24	1.77	0.00
Jun-02	7	2	3.50	0.71	669	82	8.16	3.01	0.00



Delayed Days for Facility Reasons (Average Days) (CR-4) (Parity - No Diagnostic)

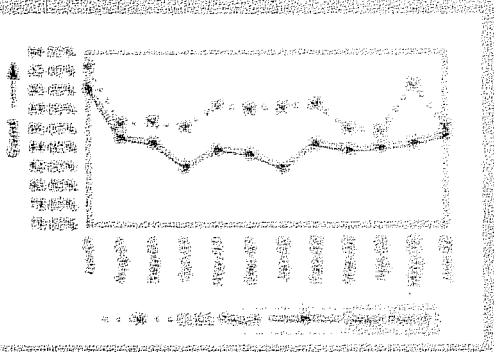
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Z Score	Parity Stat
Jul-01					27	3	9.00		
Aug-01					18	10	1.80		
Sep-01					40	4	10.00		
Oct-01					74	7	10.57		
Nov-01					591	12	49.25		
Dec-01					71	11	6.45		
Jan-02					126	21	6.00		
Feb-02					57	6	9.50		
Mar-02					35	5	7.00		
Apr-02					36	1	36.00		
May-02					437	10	43.70		
Jun-02					21	2	10.50		



Checklist #14 - Resale - Business Installation

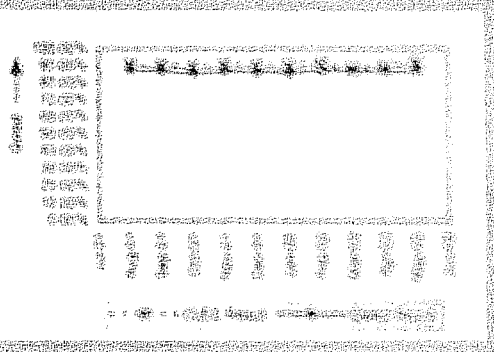
New Service Installation Quality (Percent OOS) (Parity)

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Test Stat	Parity Ind
Jul-01	955	1032	92.54%	26.28%	47101	52184	90.26%	-4.46	-4.46
Aug-01	593	685	86.57%	34.10%	30764	35192	87.42%	1.14	1.14
Sep-01	490	565	86.73%	33.93%	23944	28353	84.45%	-5.48	1.14
Oct-01	548	636	86.16%	34.53%	23058	28125	81.96%	-8.31	-5.48
Nov-01	592	669	88.49%	31.91%	23392	27920	83.78%	-4.20	-4.20
Dec-01	609	691	88.13%	32.34%	23188	27823	83.33%	-4.34	-4.20
Jan-02	767	869	88.26%	32.19%	26248	31411	83.56%	-4.75	-4.34
Feb-02	739	834	88.61%	31.77%	21549	25865	83.32%	-4.54	-4.34
Mar-02	664	772	86.01%	34.69%	20612	24662	83.58%	-3.67	-3.67
Apr-02	703	820	85.73%	34.97%	21784	25966	83.90%	-4.34	-3.67
May-02	751	829	90.59%	29.20%	22761	26580	85.63%	-4.6	-4.34
Jun-02	633	733	86.36%	34.32%	22156	25971	85.31%	-0.77	-4.34



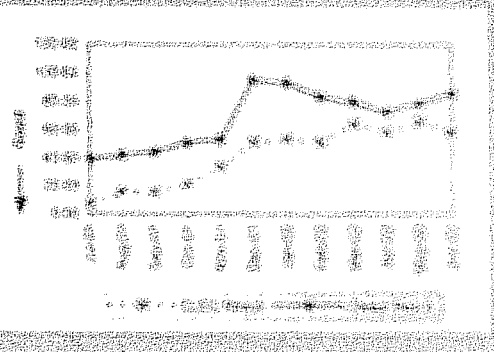
New Service Installation Quality (Percent OOS) (Parity)

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Test Stat	Parity Ind
Jul-01									
Aug-01	624	685	91.09%	28.48%	31923	35192	90.71%	-1.32	-1.32
Sep-01	512	565	90.62%	29.16%	24904	28353	87.84%	-4	-4.24
Oct-01	572	636	89.94%	30.08%	24327	28125	86.51%	-4.84	-4.84
Nov-01	611	669	91.33%	28.14%	24456	27920	87.57%	-3.94	-3.94
Dec-01	629	691	91.03%	28.58%	24328	27823	87.45%	-3.7	-3.94
Jan-02	792	869	91.14%	28.42%	27974	31411	89.05%	-3.93	-3.93
Feb-02	761	834	91.25%	28.26%	23327	25865	90.19%	-2.6	-3.93
Mar-02	684	772	88.60%	31.78%	21560	24662	87.43%	-4.44	-4.44
Apr-02	734	820	89.51%	30.64%	22794	25966	87.78%	-3.77	-4.44
May-02	769	829	92.76%	25.91%	23573	26580	88.68%	-4.88	-4.88
Jun-02									



Interval for Pending Orders Delayed Past Due Date (Average Days) (Parity)

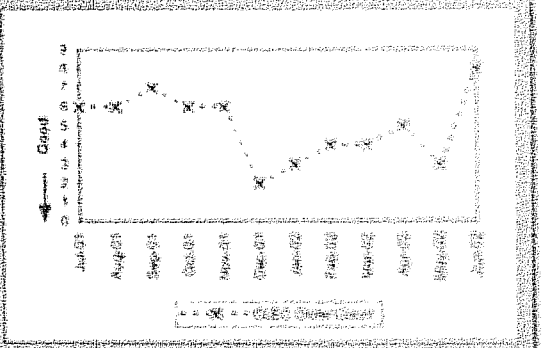
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Test Stat	Parity Ind
Jul-01	110	14	7.86	7.70	102748	1597	64.34	-8.25	-8.25
Aug-01	207	13	15.92	16.25	132743	1726	76.92	-5.19	-8.25
Sep-01	267	16	16.69	16.88	136869	1740	78.67	-5.19	-8.25
Oct-01	437	20	21.85	24.75	151727	2043	74.27	-6.71	-8.25
Nov-01	757	22	34.41	29.73	177193	1965	90.18	5.37	-8.25
Dec-01	472	9	52.44	50.93	188349	1973	95.47	9	-8.25
Jan-02	652	12	54.33	56.10	180464	1994	90.51	-1.19	-8.25
Feb-02	727	14	51.93	66.05	196217	2369	82.83	-3.57	-8.25
Mar-02	907	14	64.79	72.28	215979	2597	83.17	-3.34	-8.25
Apr-02	1128	19	59.37	75.52	240146	3258	73.71	-6.43	-8.25
May-02	1333	20	66.65	83.38	254306	3228	78.78	-4.93	-8.25
Jun-02	1298	22	59.00	86.56	275960	3183	86.71	-1.91	-8.25



Checklist #14 - Resale - Business Installation

Count of Pending Orders Delayed for Facilities Reasons Business (OP-15B) (Diagnostic)

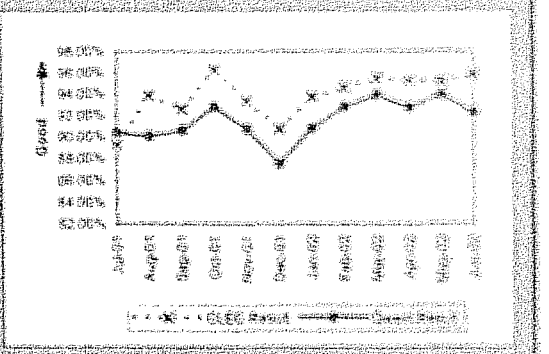
Date	CLEC Order Count
Jul-01	6
Aug-01	6
Sep-01	7
Oct-01	6
Nov-01	6
Dec-01	2
Jan-02	3
Feb-02	4
Mar-02	4
Apr-02	5
May-02	3
Jun-02	6



Checklist #14 - Resale - Business Repair

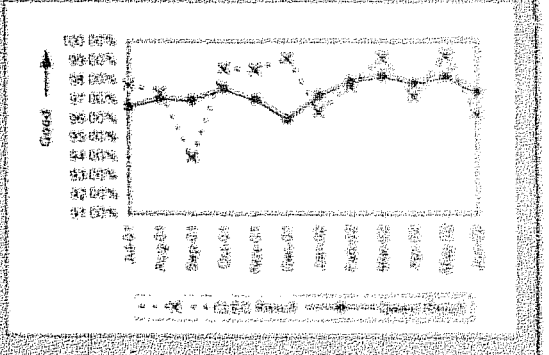
Out of Service Cleared within 24 hours (Percent) (MR-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	225	252	89.29%	30.93%	11729	12980	90.36%	-0.59	-0.64
Aug-01	230	245	93.88%	23.97%	11907	13217	90.09%	-1.97	-2.2
Sep-01	138	149	92.62%	26.15%	9212	10173	90.55%	-0.86	-1.52
Oct-01	157	163	96.32%	18.83%	9645	10394	92.79%	-1.73	-2.05
Nov-01	141	151	93.38%	24.87%	8266	9110	90.74%	-1.11	-1.68
Dec-01	78	86	90.70%	29.05%	7348	8398	87.50%	-0.89	-1.54
Jan-02	90	96	93.75%	24.21%	7564	8333	90.77%	-1	-1.61
Feb-02	88	93	94.62%	22.56%	6472	6975	92.79%	-0.68	-1.41
Mar-02	85	89	95.51%	20.72%	6999	7453	93.91%	-0.63	-1.34
Apr-02	100	105	95.24%	21.30%	7540	8132	92.72%	-0.99	-1.6
May-02	99	104	95.19%	21.39%	7991	8508	93.92%	-0.54	-1.33
Jun-02	116	121	95.87%	19.90%	7889	8552	92.25%	-1.48	-1.9



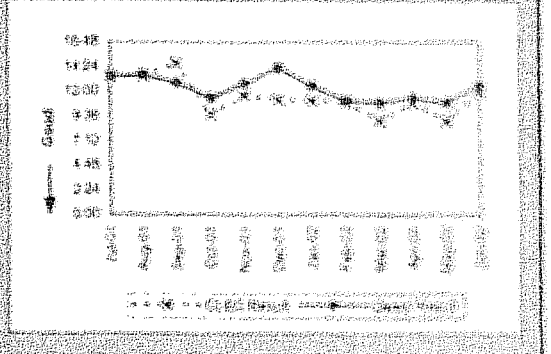
All Troubles Cleared within 48 hours (Percent) (MR-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	306	313	97.76%	14.79%	16203	16771	96.61%	-1.11	-1.68
Aug-01	295	303	97.36%	16.03%	16869	17381	97.05%	-0.31	-1.19
Sep-01	172	183	93.99%	23.77%	13020	13428	96.96%	2.1	0.23
Oct-01	214	217	98.62%	11.68%	13459	13793	97.58%	-0.99	-1.6
Nov-01	203	206	98.54%	11.98%	11918	12284	97.02%	-1.28	-1.78
Dec-01	110	111	99.10%	9.45%	10816	11270	95.97%	-1.67	-2.01
Jan-02	133	138	96.38%	18.69%	11022	11340	97.20%	0.85	-0.63
Feb-02	128	131	97.71%	14.96%	9224	9420	97.92%	0.24	-0.86
Mar-02	119	120	99.17%	9.09%	9737	9914	98.21%	-0.78	-1.48
Apr-02	139	143	97.20%	16.49%	10507	10738	97.85%	0.57	-0.65
May-02	133	134	99.25%	8.61%	11060	11266	98.17%	-0.93	-1.57
Jun-02	154	160	96.25%	19.00%	10774	11066	97.36%	0.87	-0.47



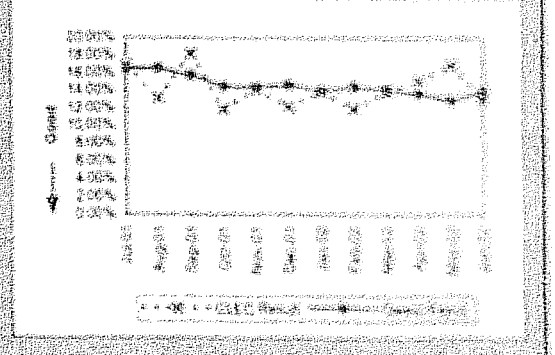
Mean Time to Restore (Hours:Minutes) (MR-6A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	4216:59	313	13:28	18:28	225255:14	16771	13:26	0.01	-0.09
Aug-01	4098:11	303	13:32	15:34	236401:24	17381	13:36	-0.07	-1.04
Sep-01	2701:30	183	14:46	20:51	172578:50	13428	12:51	1.5	0.39
Oct-01	2124:15	217	9:47	12:45	156709:39	13793	11:22	-1.65	-2.08
Nov-01	2398:35	206	11:39	12:14	156972:46	12284	12:47	-1.07	-1.66
Dec-01	1239:15	111	11:10	10:44	160749:09	11270	14:16	-1.92	-2.13
Jan-02	1533:03	138	11:07	13:52	142302:20	11340	12:33	-0.54	-1.08
Feb-02	1443:16	131	11:01	12:26	104484:16	9420	11:06	-0.06	-0.64
Mar-02	1105:15	120	9:13	9:26	108314:30	9914	10:56	-1.35	-1.81
Apr-02	1571:19	143	10:59	16:48	122522:57	10738	11:25	-0.34	-0.9
May-02	1230:51	134	9:11	10:23	123636:03	11266	10:58	-1.56	-1.95
Jun-02	1922:09	160	12:01	13:12	136996:27	11066	12:34	-0.43	-1.23



Repair Repeat Report Rate (Percent) (MR-7A) (Parity)-- Dispatches Within MSAs

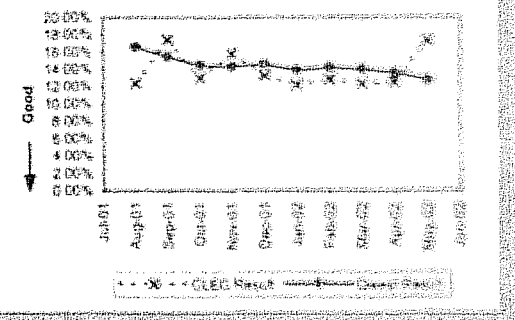
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	55	325	16.92%	37.50%	2861	17355	16.49%	0.23	-0.66
Aug-01	41	312	13.14%	33.78%	2976	17985	16.55%	-1.61	1.98
Sep-01	35	192	18.23%	38.61%	2181	13857	15.74%	0.94	-0.43
Oct-01	26	219	11.87%	32.35%	2061	14209	14.50%	-1.1	-1.67
Nov-01	30	211	14.22%	34.92%	1819	12647	14.38%	-0.07	-1.04
Dec-01	14	115	12.17%	32.70%	1713	11628	14.67%	-0.75	-1.46
Jan-02	20	143	13.99%	34.68%	1640	11706	14.01%	-0.01	-1
Feb-02	16	134	11.94%	32.43%	1397	9566	14.45%	-0.82	-1.5
Mar-02	17	122	13.93%	34.63%	1426	10127	14.08%	-0.05	-1.03
Apr-02	22	145	15.17%	35.88%	1510	10989	13.74%	0.52	-0.49
May-02	23	136	16.91%	37.49%	1488	11513	12.92%	1.39	-0.18
Jun-02	21	162	12.96%	33.59%	1590	11326	14.04%	-0.39	-1.04



Checklist #14 - Resale - Business Repair

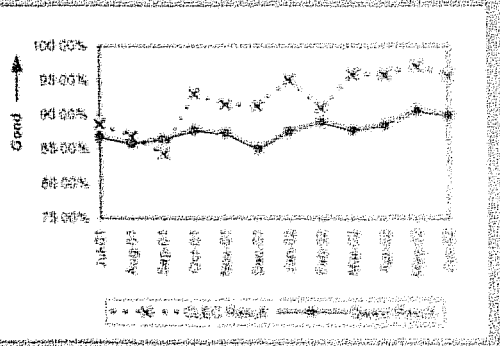
Repair Repeat Report Rate (Percent) (MR-7A*) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	35	282	12 41%	32 97%	2588	15566	16 63%	-1 88	-2 15
Sep-01	29	166	17 47%	37 97%	1853	11946	15 51%	0 7	-0 57
Oct-01	25	192	13 02%	33 65%	1753	12120	14 46%	-0 56	-1 34
Nov-01	29	183	15 85%	36 52%	1564	10921	14 32%	0 6	-0 64
Dec-01	14	105	13 33%	33 99%	1469	10071	14 59%	-0 36	-1 22
Jan-02	16	131	12 21%	32 74%	1395	10047	13 88%	-0 55	-1 33
Feb-02	14	109	12 84%	33 46%	1194	8396	14 22%	-0 41	-1 25
Mar-02	13	105	12 38%	32 94%	1255	8928	14 06%	-0 49	-1 3
Apr-02	16	127	12 60%	33 18%	1343	9852	13 63%	-0 34	-1 21
May-02	22	127	17 32%	37 84%	1334	10462	12 75%	1 49	-0 09
Jun-02									



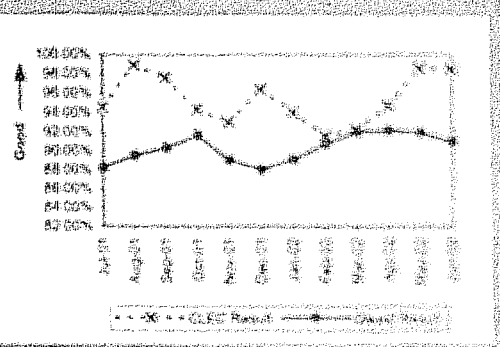
Repair Appointments Met (Percent) (MR-9A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	288	325	88 62%	31 76%	15044	17355	86 68%	-1 02	-1 62
Aug-01	271	312	86 86%	33 78%	15432	17985	85 80%	-0 53	-1 32
Sep-01	162	192	84 38%	36 31%	11971	13857	86 39%	0 81	-0 5
Oct-01	204	219	93 15%	25 26%	12470	14209	87 76%	-2 42	-2 47
Nov-01	193	211	91 47%	27 93%	11035	12647	87 25%	-1 82	-2 15
Dec-01	105	115	91 30%	28 18%	9931	11678	85 04%	-1 87	-2 14
Jan-02	136	143	95 10%	21 58%	10243	11706	87 50%	-2 73	-2 66
Feb-02	122	134	91 04%	28 55%	8593	9656	88 99%	-0 79	-1 48
Mar-02	117	122	95 90%	19 83%	8877	10127	87 66%	-2 75	-2 67
Apr-02	139	145	95 86%	19 92%	9722	10989	88 47%	-2 72	-2 68
May-02	132	136	97 06%	16 90%	10420	11513	90 51%	-2 59	-2 55
Jun-02	155	162	95 68%	20 33%	10179	11326	89 87%	-2 43	-2 48



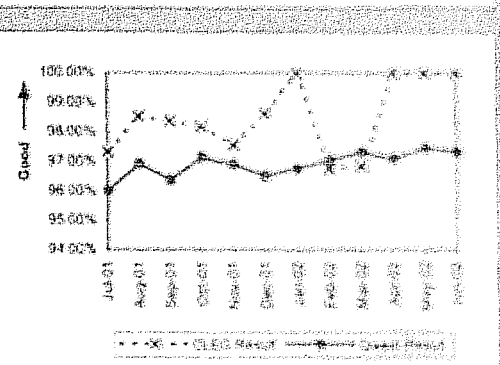
Out of Service Cleared within 24 hours (Percent) (MR-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	105	111	94 59%	22 61%	3625	4107	88 26%	-2 04	-2 24
Aug-01	98	99	98 99%	10 00%	3768	4205	89 61%	-3 62	-2 84
Sep-01	84	86	97 67%	15 07%	2752	3044	90 41%	-2 25	-2 37
Oct-01	85	90	94 44%	22 91%	2792	3042	91 78%	-0 91	-1 55
Nov-01	54	58	93 10%	25 34%	2421	2719	89 04%	-0 98	-1 6
Dec-01	54	56	96 43%	18 56%	2123	2410	88 09%	-1 9	-2 16
Jan-02	48	51	94 12%	23 53%	2047	2295	89 19%	-1 12	-1 68
Feb-02	44	48	91 67%	27 64%	1859	2047	90 82%	-0 2	-1 12
Mar-02	36	39	92 31%	26 65%	1962	2130	92 11%	-0 04	-1 03
Apr-02	55	58	94 83%	22 15%	2264	2454	92 26%	-0 72	-1 44
May-02	72	73	98 63%	11 62%	2432	2643	92 02%	-2 06	-2 25
Jun-02	70	71	98 59%	11 78%	2710	2975	91 09%	-2 19	-2 33



All Troubles Cleared within 48 hours (Percent) (MR-4B) (Parity)-- Dispatches Outside MSAs

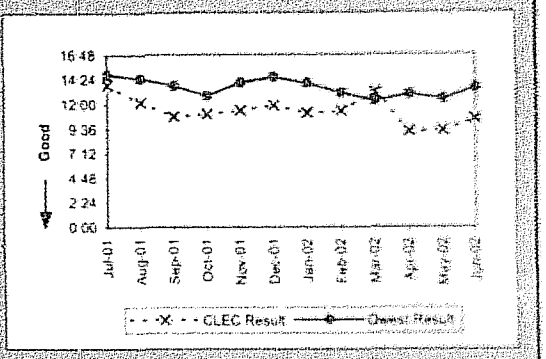
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	146	150	97 33%	16 11%	5216	5433	96 01%	-0 82	-1 5
Aug-01	134	136	98 53%	12 04%	5441	5613	96 94%	-1 07	-1 65
Sep-01	122	124	98 39%	12 60%	3903	4049	96 39%	-1 17	-1 71
Oct-01	110	112	98 21%	13 24%	3996	4113	97 16%	-0 67	-1 4
Nov-01	80	82	97 56%	15 43%	3720	3839	96 90%	-0 34	-1 21
Dec-01	72	73	98 63%	11 62%	3230	3346	96 53%	-0 97	-1 59
Jan-02	67	67	100 00%	0 00%	3149	3254	96 77%	-1 48	-1 9
Feb-02	60	62	96 77%	17 67%	2783	2667	97 07%	0 21	-0 83
Mar-02	62	64	96 88%	17 40%	2860	2938	97 35%	0 3	-0 82
Apr-02	79	79	100 00%	0 00%	3330	3429	97 11%	-1 52	-1 92
May-02	100	100	100 00%	0 00%	3469	3559	97 47%	-1 59	-1 93
Jun-02	83	83	100 00%	0 00%	3792	3895	97 36%	-1 49	-1 9



Checklist #14 - Resale - Business Repair

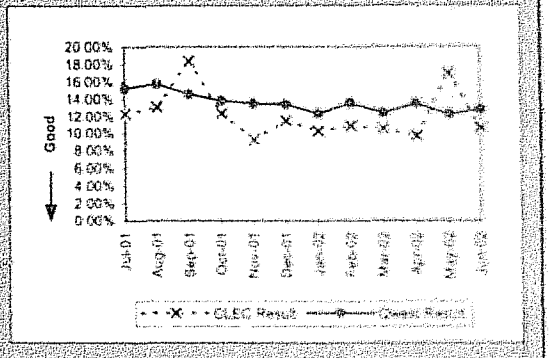
Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	2884.54	150	13:54	14:01	80819:50	5433	14:53	-0.65	-1.4
Aug-01	1683.59	136	12:13	11:33	81272:57	5613	14:29	-1.25	-1.76
Sep-01	1946.01	124	10:51	12:44	55947:32	4049	13:49	-2.06	-2.25
Oct-01	1342.15	112	11:05	11:56	52921:00	4113	12:52	-1.13	-1.69
Nov-01	937.08	82	11:26	12:38	54210:31	3839	14:07	-1.57	-1.95
Dec-01	849.30	73	11:57	10:18	49019:21	3346	14:39	-1.45	-1.88
Jan-02	750.46	67	11:12	9:35	45751:28	3254	14:04	-1.24	-1.76
Feb-02	708.44	62	11:23	13:40	37686:37	2867	13:09	-0.68	-1.41
Mar-02	943.13	84	13:11	13:15	36261:41	2938	12:21	0.54	-0.67
Apr-02	744.56	79	9:24	8:13	44546:21	3429	12:59	-1.36	-1.83
May-02	953.11	100	9:32	8:19	44741:29	3559	12:34	-1.88	-2.14
Jun-02	879.47	83	10:36	8:09	52893:48	3895	13:35	-1.91	-2.16



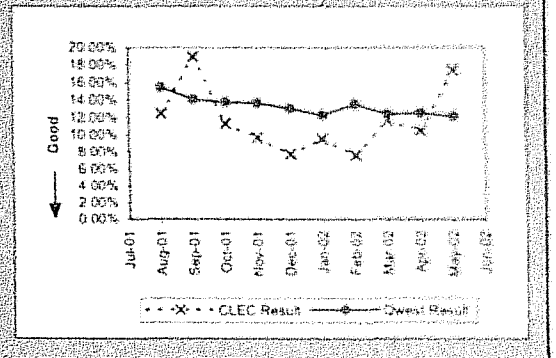
Repair Repeat Report Rate (Percent) (MR-7B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	19	154	12.34%	32.89%	848	5532	15.27%	-1	-1.61
Aug-01	18	137	13.14%	33.78%	902	5717	15.78%	-0.84	-1.51
Sep-01	23	125	18.40%	38.75%	602	4117	14.62%	1.16	-0.29
Oct-01	14	113	12.39%	32.95%	578	4180	13.83%	-0.44	-1.27
Nov-01	8	86	9.30%	29.05%	526	3891	13.52%	-1.13	-1.69
Dec-01	9	78	11.54%	31.95%	459	3415	13.44%	-0.49	-1.3
Jan-02	7	68	10.29%	30.39%	408	3302	12.36%	-0.51	-1.31
Feb-02	7	64	10.94%	31.21%	396	2913	13.59%	-0.61	-1.37
Mar-02	7	66	10.61%	30.79%	372	2998	12.41%	-0.44	-1.27
Apr-02	6	62	9.76%	29.67%	469	3473	13.50%	-0.98	-1.6
May-02	17	100	17.00%	37.56%	443	3617	12.25%	1.39	-0.16
Jun-02	9	84	10.71%	30.93%	508	3959	12.83%	-0.57	-1.35



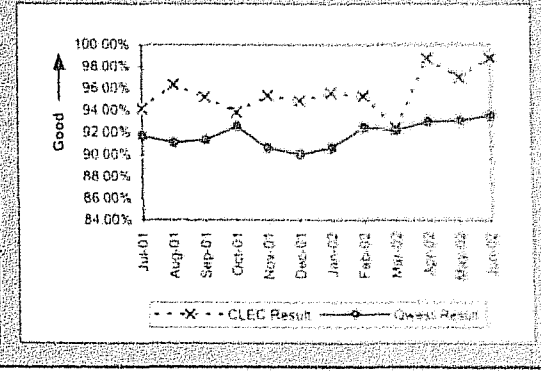
Repair Repeat Report Rate (Percent) (MR-7B*) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	14	112	12.50%	33.07%	742	4797	15.47%	-0.66	-1.52
Sep-01	18	95	18.95%	39.19%	486	3455	14.07%	1.32	-0.2
Oct-01	10	88	11.36%	31.74%	482	3496	13.79%	-0.65	-1.4
Nov-01	7	72	9.72%	29.63%	446	3262	13.67%	-0.97	-1.59
Dec-01	5	64	7.81%	26.84%	372	2844	13.08%	-1.24	-1.75
Jan-02	5	52	9.62%	29.48%	335	2723	12.30%	-0.56	-1.36
Feb-02	4	52	7.69%	26.65%	335	2467	13.58%	-1.23	-1.75
Mar-02	3	60	11.67%	32.10%	325	2616	12.42%	-0.18	-1.11
Apr-02	6	76	10.53%	30.69%	382	3042	12.56%	-0.53	-1.32
May-02	16	92	17.39%	37.90%	390	3209	12.15%	1.46	-0.11
Jun-02									



Repair Appointments Met (Percent) (MR-9B) (Parity)-- Dispatches Outside MSAs

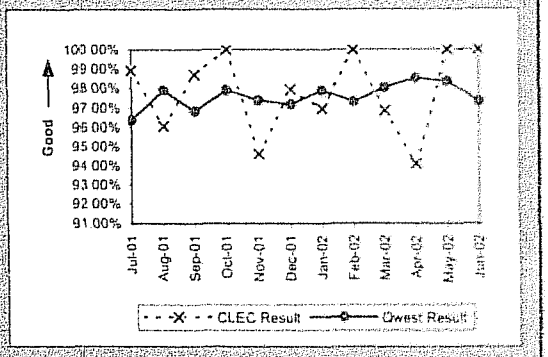
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	145	154	94.16%	23.46%	5070	5532	91.65%	-1.11	-1.67
Aug-01	130	137	96.35%	18.75%	5206	5717	91.06%	-2.14	-2.3
Sep-01	119	125	95.20%	21.38%	3760	4117	91.33%	-1.52	-1.92
Oct-01	106	113	93.81%	24.11%	3868	4180	92.54%	-0.51	-1.31
Nov-01	82	86	95.35%	21.06%	3525	3891	90.59%	-1.49	-1.91
Dec-01	74	78	94.87%	22.06%	3075	3415	90.04%	-1.41	-1.86
Jan-02	65	68	95.59%	20.54%	2992	3302	90.61%	-1.39	-1.85
Feb-02	61	64	95.31%	21.14%	2693	2913	92.45%	-0.86	-1.52
Mar-02	61	66	92.42%	26.46%	2763	2998	92.16%	-0.08	-1.05
Apr-02	51	52	98.78%	10.98%	3229	3473	92.97%	-2.03	-2.24
May-02	97	100	97.00%	17.06%	3367	3617	93.09%	-1.52	-1.92
Jun-02	83	84	98.81%	10.85%	3702	3959	93.51%	-1.95	-2.19



Checklist #14 - Resale - Business Repair

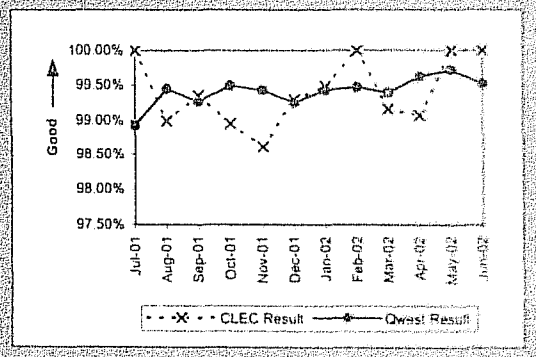
Out of Service Cleared within 24 hours (Percent) (MR-3C) (Parity)-- No Dispatches

			CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	92	93	98 92%	10 31%	4411	4575	96 42%	-1 29	-1 78
	90	92	96 68%	19 41%	4489	4585	97 91%	1 2	-0 27
	74	77	96 20%	11 32%	3520	3635	96 84%	-0 93	-1 56
	72	72	100 00%	0 00%	4059	4145	97 93%	-1 27	-1 77
	85	85	94 64%	22 52%	3360	3450	97 39%	1 18	-0 28
	49	49	97 96%	14 14%	3319	3415	97 19%	-0 32	-1 2
	66	66	96 97%	17 14%	3710	3789	97 92%	0 57	-0 65
	60	60	100 00%	0 00%	3221	3309	97 34%	-1 3	-1 79
	64	64	96 88%	17 40%	3435	3504	98 03%	0 68	-0 59
	51	54	94 12%	23 53%	2951	2995	98 53%	2	0 22
	97	97	100 00%	0 00%	2989	3039	98 35%	-0 97	-1 59
	56	56	100 00%	0 00%	2652	2725	97 32%	-1 21	-1 73



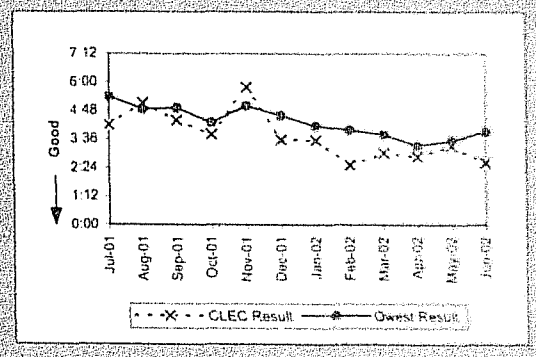
All Troubles Cleared within 48 hours (Percent) (MR-4C) (Parity)-- No Dispatches

		CLEC Dem	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	207	207	100 00%	0 00%	8574	8667	98 93%	-1 48	-1 9
	190	190	99 66%	9 97%	8879	8928	99 45%	0 84	-0 49
	135	136	99 26%	7 98%	7061	7113	99 27%	-0 13	-1 08
	191	191	98 95%	10 18%	8052	8093	99 49%	0 97	-0 41
	144	144	98 61%	11 70%	7297	7339	99 43%	1 14	-0 3
	142	142	99 30%	8 36%	6752	6803	99 25%	-0 06	-1 04
	193	193	99 48%	7 14%	8018	8064	99 43%	-0 11	-1 06
	205	205	100 00%	0 00%	7109	7147	99 47%	-1 03	-1 63
	207	207	99 16%	9 15%	7717	7764	99 39%	0 51	-0 69
	215	215	99 07%	9 60%	7181	7208	99 63%	1 16	-0 3
	168	168	100 00%	0 00%	6955	6975	99 71%	-0 73	-1 44
	197	197	100 00%	0 00%	5987	6016	99 52%	-0 96	-1 58



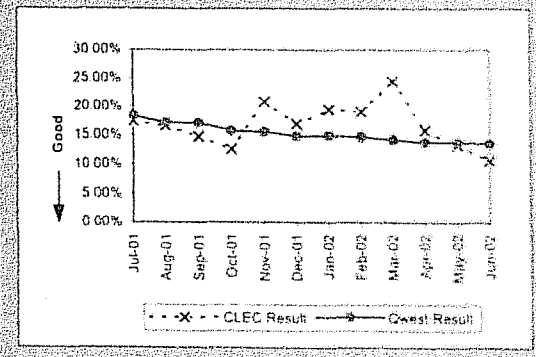
Mean Time to Restore (Hours:Minutes) (MR-6C) (Parity)-- No Dispatches

		CLEC Dem	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	207	207	4 13	5 44	46638 50	8667	5 23	-1 33	-1 81
	190	190	5 05	11 41	43404 09	8928	4 52	0 31	-0 81
	135	136	4 24	12 16	34956 46	7113	4 55	-0 63	-1 38
	191	191	7 49	7 49	34992 41	8093	4 19	-0 76	-1 46
	144	144	5 47	10 56	36738 11	7339	5 00	0 96	-0 41
	142	142	5 35	7 33	31252 36	6803	4 36	-0 74	-1 45
	193	193	5 34	9 39	33642 58	8064	4 10	-0 71	-1 43
	205	205	2 32	4 46	28576 45	7147	4 00	-2 37	-2 44
	207	207	3 02	7 24	20464 15	7764	3 48	-1 28	-1 78
	215	215	2 53	7 18	23973 46	7208	3 20	-0 91	-1 56
	168	168	3 20	5 32	24713 13	6975	3 33	-0 37	-1 22
	197	197	2 38	4 44	23635 50	6016	3 56	-2 19	-2 33



Repair Repeat Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

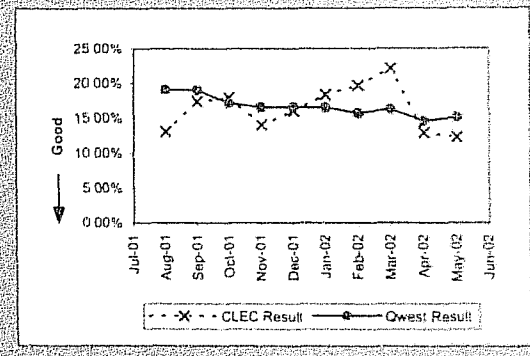
		CLEC Dem	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	96	207	17 39%	37 90%	1588	8668	18 32%	-0 34	-1 21
	93	190	16 58%	37 19%	1530	8930	17 13%	-0 2	-1 12
	26	135	14 74%	35 45%	1219	7113	17 14%	-0 78	-1 48
	24	191	12 57%	33 15%	1268	8093	15 67%	-1 17	-1 71
	30	144	20 83%	40 61%	1146	7339	15 53%	1 69	0 03
	24	142	16 90%	37 48%	1007	6803	14 80%	0 71	-0 57
	28	193	19 49%	39 61%	1200	8065	14 88%	1 74	0 06
	29	205	15 02%	35 75%	1044	7147	14 61%	1 72	0 04
	50	207	24 47%	42 99%	1103	7764	14 21%	4 12	1 5
	34	215	15 81%	36 49%	994	7208	13 79%	0 85	-0 48
	25	168	13 30%	33 96%	962	6975	13 79%	-0 19	-1 12
	27	197	10 66%	30 86%	817	6020	13 57%	-1 17	-1 71



Checklist #14 - Resale - Business Repair

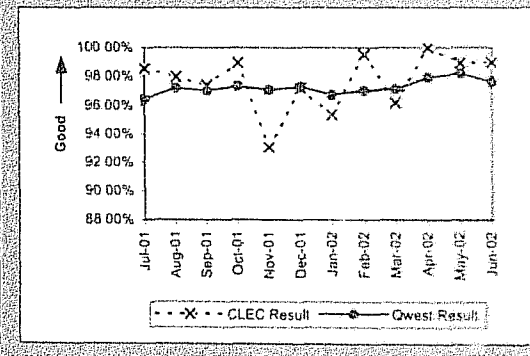
Trouble Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

				Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					974	5102	19.09%	-1.49	-1.91
					761	4034	19.01%	-0.37	-1.22
					762	4426	17.22%	0.23	-0.86
					652	3931	16.59%	-0.56	-1.36
					590	3558	16.58%	-0.13	-1.08
					711	4296	16.55%	0.52	-0.69
					590	3764	15.67%	1.18	-0.28
					673	4134	16.28%	1.84	0.12
					542	3729	14.53%	-0.51	-1.31
					509	3898	15.11%	-0.87	-1.49



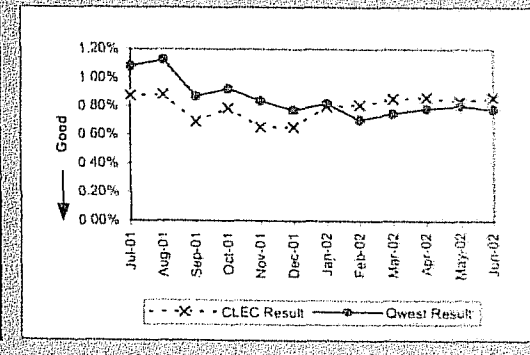
Trouble Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

				Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					8363	8668	96.47%	-1.6	-1.97
					8680	8930	97.23%	-0.64	-1.39
					6902	7113	97.03%	-0.29	-1.18
					7879	8093	97.36%	-1.36	-1.83
					7125	7339	97.08%	2.46	0.49
					6619	6803	97.30%	0.15	-0.91
					7804	8065	96.76%	1.06	-0.36
					6935	7147	97.03%	-2.06	-2.25
					7542	7764	97.14%	0.86	-0.48
					7060	7208	97.95%	-2.09	-2.27
					6851	6975	98.22%	-0.73	-1.44
					5878	6020	97.64%	-1.22	-1.74



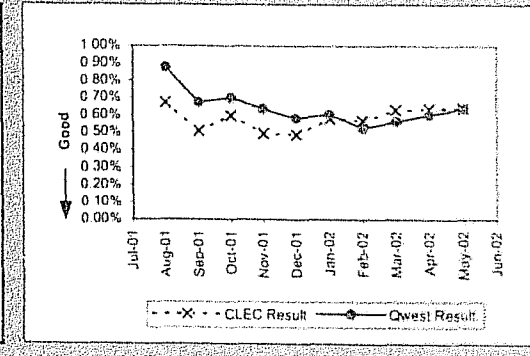
Trouble Rate (Percent) (MR-8) (Parity)

				Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					31555	2919270	1.08%	-5.47	-4.32
					32632	2898887	1.13%	-6.13	-4.73
					25087	2881397	0.87%	-4.91	-3.99
					26482	2865288	0.92%	-3.62	-3.2
					23877	2846137	0.84%	-5.17	-4.15
					21896	2830721	0.77%	-3.05	-2.85
					23073	2817331	0.82%	-0.4	-1.24
					19726	2791474	0.71%	2.74	0.67
					20889	2779438	0.75%	2.64	0.6
					21670	2760738	0.78%	1.98	0.2
					22105	2746633	0.80%	0.8	-0.52
					21305	2735697	0.78%	2.12	0.29



Trouble Rate (Percent) (MR-8) (Parity)

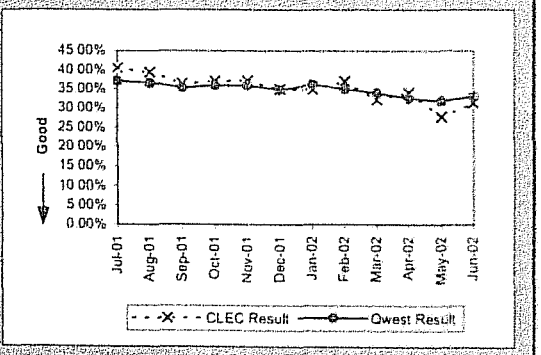
				Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					25465	2898887	0.88%	-5.9	-4.59
					19435	2881397	0.67%	-5.22	-4.17
					20042	2865288	0.70%	-3.09	-2.88
					18114	2846137	0.64%	-4.58	-3.78
					16473	2830721	0.58%	-2.76	-2.68
					17066	2817331	0.61%	-0.82	-1.5
					14627	2791474	0.52%	1.38	-0.16
					15678	2779438	0.56%	1.99	0.21
					16623	2760738	0.60%	1.05	-0.36
					17569	2746633	0.64%	0.05	-0.97



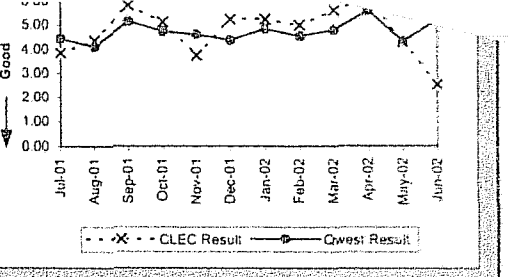
Checklist #14 - Resale - Business Repair

Trouble Reports (Percent) (MR-10) (Diagnostic)

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					18507	50162	37.09%	2.41	0.46
					18836	51470	36.60%	1.87	0.14
					13781	38868	35.46%	0.55	-0.67
					14894	41376	36.00%	0.63	-0.61
					13433	37310	36.00%	0.69	-0.58
					11729	33625	34.88%	0.09	-0.94
					13131	36204	36.27%	-0.63	-1.39
					10631	30357	35.02%	1.11	-0.33
					10807	31696	34.10%	-0.93	-1.56
					10442	32112	32.52%	0.88	-0.46
					10350	32455	31.89%	-2.12	-2.29
					10539	31844	33.10%	-0.89	-1.54

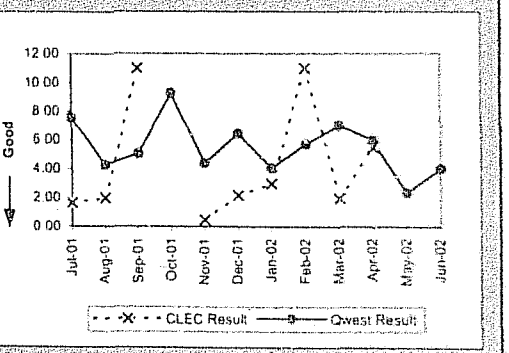


			5437	1324	4 11	1 45	-0.12
			4561	965	5 14	1 49	-0.09
			4279	905	4 73	1 34	-0.18
			3734	813	4 59	-1 04	-1.63
			2166	500	4 37	1 06	-0 36
			3814	790	4 83	0 44	-0 73
			2900	641	4 52	0 77	-0 53
			3268	691	4 76	0 81	-0 51
			3621	650	5 57	0 43	-0 74
			3455	808	4 28	-0 01	-1 01
			3202	818	5 18	-0 58	-1 35



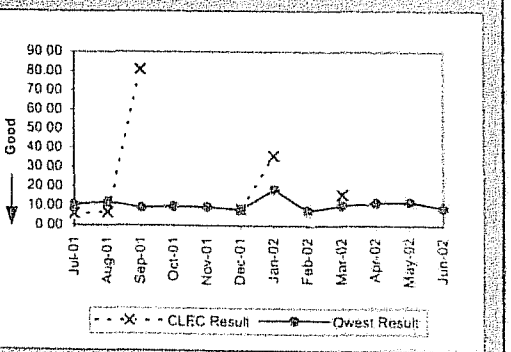
Provisioning Average Days (OP-6/A-1) (Parity)- Dispatches Within MSAs

			302	40	7 55	-1 11	-1 67
			234	55	4 25	-0 6	-1 36
			356	70	5 09	1 63	-0 01
			444	48	9 25		
			225	51	4 41	-0 6	-1 37
			181	28	6 46	-0 84	-1 51
			225	55	4 09	-0 16	-1 1
			196	22	5 73	1 17	-0 29
			295	42	7 02	-0 3	-1 18
			157	33	5 97	-0 07	-1 04
			92	23	2 36		
			81	20	4 05		



Provisioning Average Days (OP-6/A-1) (Parity)- Dispatches Within MSAs

			232	22	10 55	-1 16	-1 7
			213	18	11 83	-1 27	-1 77
			265	29	9 14	1 81	0 1
			497	51	9 75		
			283	30	9 43		
			236	29	8 21	0 18	-0 89
			637	34	18 74	0 74	-0 55
			345	46	7 50		
			187	18	10 39	0 4	-0 75
			209	18	11 61		
			207	17	12 18		
			174	19	9 16		

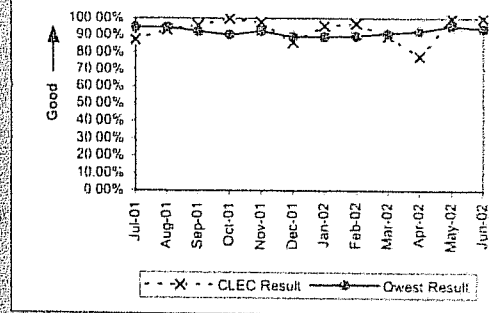


Checklist #14 - Resale - Centrex Installation

Parity - Disparities Within MSAs

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				1050	1108	94.77%	2.33	0.42
				1240	1307	94.87%	0.61	-0.63
				863	935	92.30%	-1.18	-1.72
				801	886	90.41%	-2.64	-2.61
				753	813	92.62%	-1.31	-1.8
				449	503	89.26%	0.71	-0.57
				699	784	89.16%	-1.41	-1.86
				604	674	89.59%	-1.35	-1.82
				672	682	91.20%	0.31	-0.81
				555	644	92.39%	1.37	-0.17
				773	811	95.31%	-0.44	-1.27
				573	614	93.81%	-0.36	-1.22

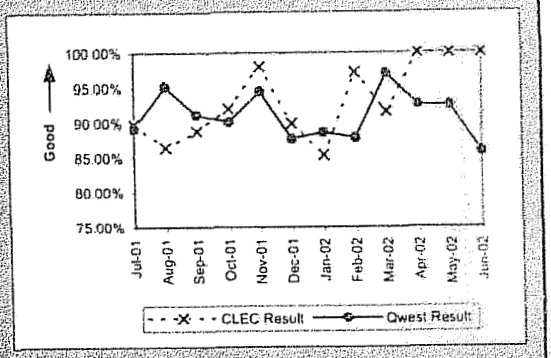
Parity - Disparities Within MSAs



Checklist #14 - Resale - Centrex Installation

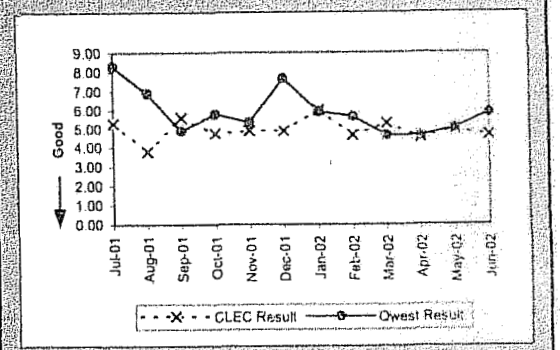
Provisioning Timeliness (Average Days) (OP-4B) (Parity) -- Dispatches Outside MSAs

				Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				125	140	89.29%	-0.14	-1.08
				156	168	95.24%	2.37	0.44
				124	136	91.18%	0.51	-0.69
				110	122	90.16%	-0.41	-1.25
				86	91	94.51%	-0.89	-1.54
				79	96	87.78%	-0.38	-1.23
				78	88	88.64%	0.53	-0.68
				80	91	87.91%	-1.45	-1.88
				99	102	97.06%	1.08	-0.34
				88	95	92.63%	-1.04	-1.63
				99	107	92.52%	-0.49	-1.3
				67	78	85.90%	-1.35	-1.82



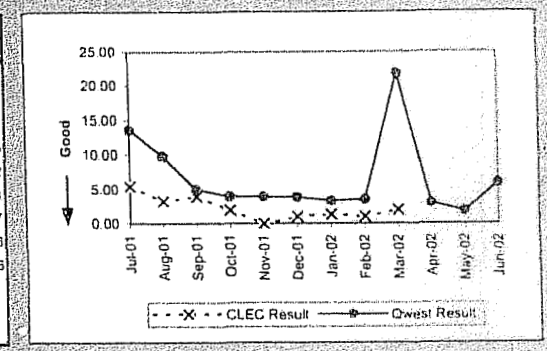
Provisioning Timeliness (Average Days) (OP-4B) (Parity) -- Dispatches Outside MSAs

				Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				1179	142	8.30	-1.76	-2.07
				1181	171	6.91	-3.69	-3.24
				669	136	4.92	0.48	-0.71
				714	123	5.80	-1.17	-1.71
				493	92	5.36	-0.44	-1.27
				714	93	7.68	-1.44	-1.87
				527	89	5.92	0.04	-0.97
				516	91	5.67	-1.05	-1.64
				485	104	4.66	0.78	-0.52
				445	96	4.64	-0.05	-1.03
				546	108	5.06	-0.01	-1.01
				466	84	5.89	-0.69	-1.42



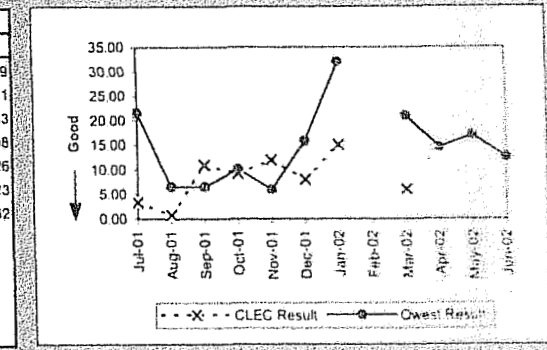
Provisioning Timeliness (Average Days) (OP-6A-2) (Parity) -- Dispatches Outside MSAs

				Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				82	6	13.67	-0.61	-1.37
				69	7	9.86	-1.25	-1.76
				40	8	5.00	-0.21	-1.13
				12	3	4.00	-1.73	-2.05
				16	4	4.00	-0.69	-1.42
				27	7	3.86	-0.56	-1.34
				20	6	3.33	-0.94	-1.57
				39	11	3.55	-0.76	-1.46
				87	4	21.75	-0.43	-1.26
				15	5	3.00		
				9	5	1.80		
				36	6	6.00		



Provisioning Timeliness (Average Days) (OP-6B-2) (Parity) -- Dispatches Outside MSAs

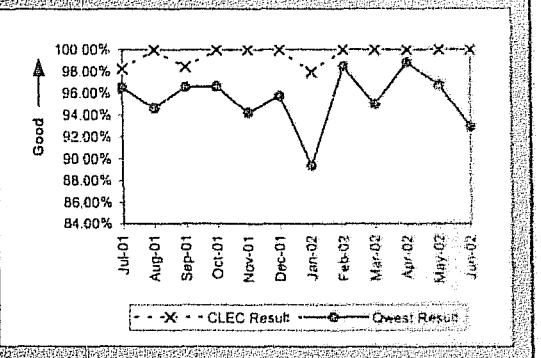
				Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				195	9	21.67	-1.14	-1.69
				13	2	6.50	-3.45	-3.1
				26	4	6.50	1.09	-0.33
				91	9	10.11	-0.14	-1.08
				12	2	6.00	3.72	1.26
				79	5	15.80	-0.38	-1.23
				128	4	32.00	-1.03	-1.62
				21	1	21.00		
				29	2	14.50		
				34	2	17.00		
				63	5	12.60		



Checklist #14 - Resale - Centrex Installation

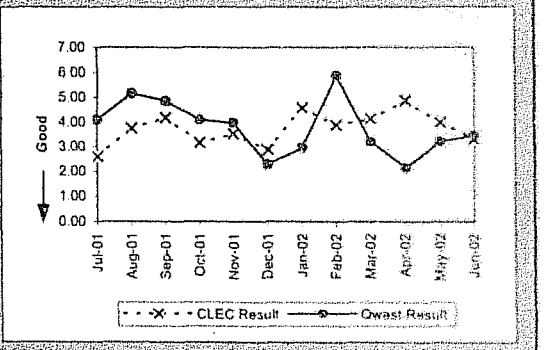
Installation Commitments Met (Percent) (OP-3C) (Parity)-- No Dispatches

		CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	113	114	98.25%	13.13%	583	583	96.57%	-0.9	-1.55
	65	65	100.00%	0.00%	407	430	94.65%	-1.72	-2.05
	61	61	98.44%	12.40%	425	440	96.59%	-0.76	-1.46
	56	56	100.00%	0.00%	231	239	96.65%	-1.25	-1.76
	51	51	100.00%	0.00%	131	139	94.24%	-1.51	-1.92
	62	62	100.00%	0.00%	45	47	95.74%	-1.09	-1.66
	47	48	97.92%	14.28%	59	66	89.39%	-1.46	-1.89
	36	36	100.00%	0.00%	64	65	98.46%	-0.54	-1.33
	14	14	100.00%	0.00%	38	40	95.00%	-0.74	-1.45
	9	9	100.00%	0.00%	83	84	98.81%	-0.31	-1.19
	6	6	100.00%	0.00%	119	123	96.75%	-0.44	-1.27
	3	3	100.00%	0.00%	79	85	92.94%	-0.47	-1.29



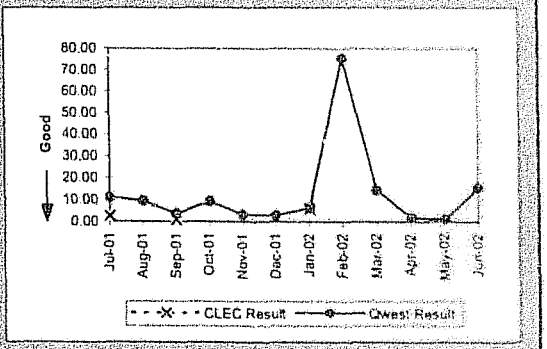
Installation Interval (Average Days) (OP-4C) (Parity)-- No Dispatches

		CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	113	113	2.61	1.83	2356	573	4.11	-2.79	-2.7
	65	65	3.75	1.72	2160	422	5.17	-2.37	-2.44
	61	61	4.20	1.27	2107	433	4.87	-2.52	-2.53
	56	56	3.16	1.56	933	228	4.09	-2.2	-2.33
	51	51	3.54	1.25	524	132	3.97	-1.15	-1.7
	62	62	2.89	1.54	103	45	2.29	1.41	-0.14
	47	47	4.60	1.81	190	64	2.97	0.97	-0.41
	36	36	3.88	1.66	382	65	5.88	-0.49	-1.3
	14	14	4.14	2.41	128	40	3.20	0.62	-0.62
	9	9	4.89	0.33	181	84	2.15	3.72	1.26
	5	5	4.05	2.24	396	123	3.22	1.3	-0.21
	3	3	3.33	2.89	291	84	3.46	-0.04	-1.02



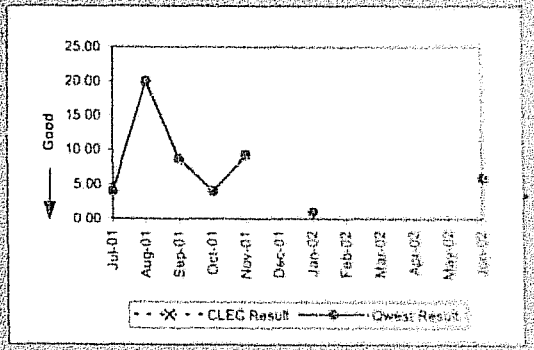
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-3) (Parity)-- No Dispatches

		CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	4	2	2.50	2.12	232	21	11.05	-0.53	-1.32
					218	23	9.48		
	1	1	1.00		47	13	3.62	-0.44	-1.27
					94	10	9.40		
					23	7	3.29		
					6	2	3.00		
	6	1	6.00		57	9	6.33	-0.03	-1.02
					151	2	75.50		
					29	2	14.50		
					2	1	2.00		
					4	3	1.33		
					78	5	15.60		



Delayed Days for Facility Reasons (Average Days) (OP-6B-3) (Parity)-- No Dispatches

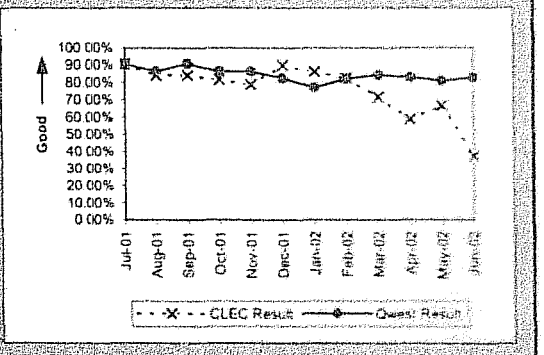
		CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
					4	1	4.00		
					20	1	20.00		
					26	3	8.67		
					4	1	4.00		
					28	3	9.33		
					1	1	1.00		
					6	1	6.00		



Checklist #14 - Resale - Centrex Installation

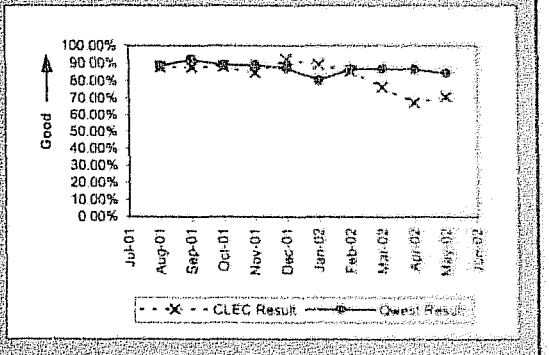
New Service Installation Quality (Percent) (OP-5) (Parity)

			CLEC Res	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
		182	93.96%	23.24%	1966	2171	90.56%	0	-1
		254	84.25%	36.43%	1639	1894	86.54%	0.99	-0.4
		215	84.30%	36.38%	1561	1741	90.81%	2.88	0.75
		198	91.62%	28.57%	1219	1411	86.39%	1.69	0.03
		171	78.95%	40.77%	1010	1169	86.40%	2.48	0.51
		157	89.81%	30.25%	707	858	82.40%	-2.24	-2.36
		152	86.27%	34.41%	617	801	77.03%	-2.49	-2.51
		129	82.50%	38.00%	723	878	82.35%	-0.04	-1.03
		92	71.43%	45.18%	690	820	84.15%	2.67	0.63
		46	56.70%	49.24%	693	835	82.99%	3.74	1.28
		24	66.67%	47.14%	761	941	80.87%	1.64	0
		16	87.50%	46.41%	763	923	82.67%	3.95	1.4



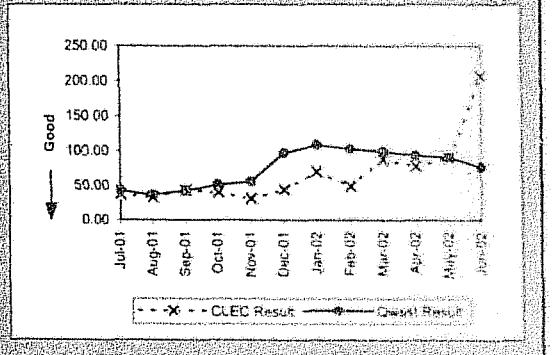
New Service Installation Quality (Percent) (OP-5*) (Parity)

			CLEC Res	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
		254	86.19%	32.27%	1679	1894	88.65%	0.23	-0.86
		225	87.89%	32.62%	1606	1741	92.25%	2.13	0.29
		198	86.36%	32.94%	1255	1411	88.94%	0.25	-0.85
		171	84.80%	35.91%	1042	1169	89.14%	1.62	-0.01
		157	92.36%	26.57%	748	858	87.18%	-1.78	-2.08
		152	89.54%	30.60%	645	801	80.52%	-2.58	-2.57
		129	86.83%	34.87%	762	878	86.79%	0.31	-0.81
		93	76.62%	42.32%	714	820	87.07%	2.38	0.45
		46	67.39%	46.88%	723	835	86.59%	3.23	0.96
		24	79.60%	45.45%	795	941	84.48%	1.69	0.02



Average for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

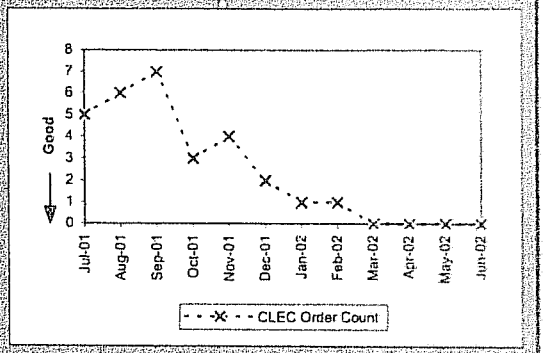
			CLEC Res	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
		11	37.45	47.48	7103	167	42.53	-0.32	-1.2
		22	33.14	43.15	9565	264	36.23	-0.29	-1.18
		11	43.36	59.06	12158	282	43.11	1.65	0.01
		9	40.22	62.27	14411	281	51.28	-0.59	-1.36
		14	31.50	59.37	16257	290	56.06	-1.51	-1.92
		7	44.71	85.01	7115	73	97.47	-1.83	-2.11
		5	70.60	106.86	7863	72	109.21	-1.06	-1.64
		9	49.44	99.57	8663	84	103.13	-1.71	-2.04
		6	88.00	108.89	9564	96	99.62	-0.29	-1.18
		6	78.83	122.79	11447	122	93.83	-0.37	-1.22
		5	90.80	142.32	10764	118	91.22	-0.01	-1.01
		3	208.00	219.20	10507	136	77.26	1.56	-0.05



Checklist #14 - Resale - Centrex Installation

Percent of Missing Orders Delayed for Facilities Reasons Centrex (OP-15B) (Diagnostic)

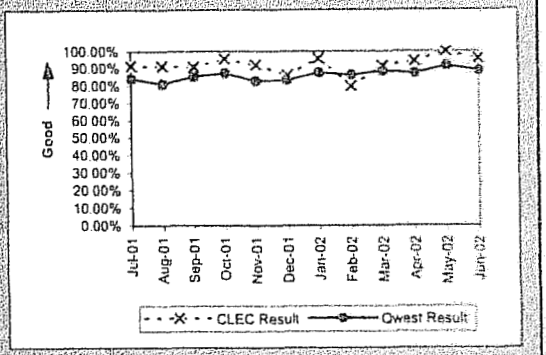
	CLEC Order Count
	5
	6
	7
	3
	4
	2
	1
	1
	0
	0
	0
	0



Checklist #14 - Resale - Centrex Repair

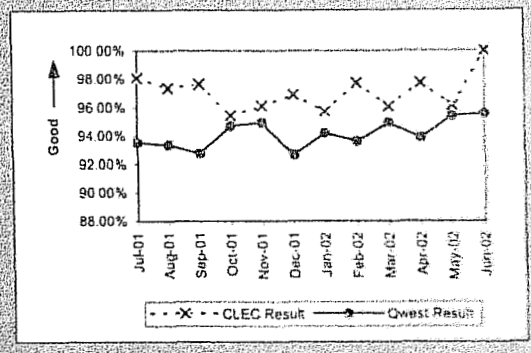
Repair Service Cleared within 24 Hours (Percent) (MR-3A) (Parity)-- Dispatches Within MSAs

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
			91.60%	27.74%	495	586	84.47%	-1.96	-2.19
			91.59%	27.85%	619	763	81.13%	-2.69	-2.63
			90.91%	28.75%	455	532	85.53%	-1.4	-1.85
			95.56%	20.61%	482	552	87.32%	-2.18	-2.32
			93.22%	26.78%	396	478	82.85%	-2.16	-2.32
			86.36%	34.32%	352	422	83.41%	-0.5	-1.3
			92.62%	19.79%	424	484	87.60%	-1.68	-2.02
			80.00%	40.00%	367	426	86.15%	0.98	-0.4
			91.43%	27.99%	371	419	88.54%	-0.51	-1.31
			94.29%	23.21%	383	439	87.24%	-1.2	-1.73
			100.00%	0.00%	405	443	91.42%	-1.24	-1.75
			95.83%	19.98%	366	413	88.62%	-1.08	-1.66



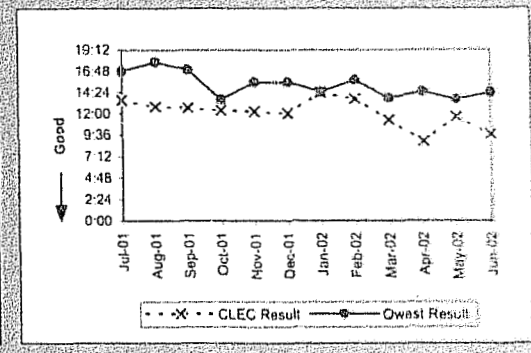
All Troubles Cleared within 48 Hours (Percent) (MR-4A) (Parity)-- Dispatches Within MSAs

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
			98.10%	13.65%	710	759	93.54%	-2.12	-2.29
			97.39%	15.96%	873	935	93.37%	-1.85	-2.13
			97.66%	15.13%	655	706	92.78%	-1.96	-2.19
			99.45%	20.83%	678	716	94.69%	-0.36	-1.22
			98.12%	19.30%	582	613	94.94%	-0.56	-1.34
			96.92%	17.27%	517	558	92.65%	-1.25	-1.76
			95.71%	20.25%	583	619	94.18%	-0.52	-1.32
			97.73%	14.90%	498	532	93.61%	-1.07	-1.65
			96.08%	19.41%	503	530	94.91%	-0.36	-1.22
			97.73%	14.90%	537	572	93.88%	-1.03	-1.62
			96.15%	19.23%	560	587	95.40%	-0.18	-1.11
			100.00%	0.00%	536	561	95.54%	-1.08	-1.65



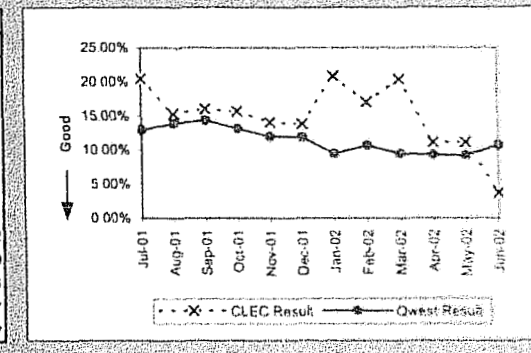
Mean Time to Restore (Hours:Minutes) (MR-6A) (Parity)-- Dispatches Within MSAs

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
			13:32	19:02	12748:50	759	16:48	-1.33	-1.81
			12:49	16:52	16668:16	935	17:50	-1.85	-2.13
			12:39	14:58	11966:58	706	16:57	-1.46	-1.89
			12:23	19:00	9751:47	716	13:37	-0.66	-1.4
			12:13	19:29	9519:49	613	15:32	-1.35	-1.82
			12:02	14:31	8686:03	558	15:34	-1.42	-1.86
			14:21	21:08	8960:28	619	14:29	-0.04	-1.02
			13:41	14:01	8394:54	532	15:47	-0.52	-1.32
			11:19	12:44	7287:57	530	13:45	-0.75	-1.45
			8:53	12:08	8299:23	572	14:31	-1.38	-1.84
			11:39	13:48	7981:51	587	13:36	-0.53	-1.32
			9:42	8:07	8052:48	561	14:21	-0.89	-1.54



Repair Request Report Rate (Percent) (MR-7A) (Parity)-- Dispatches Within MSAs

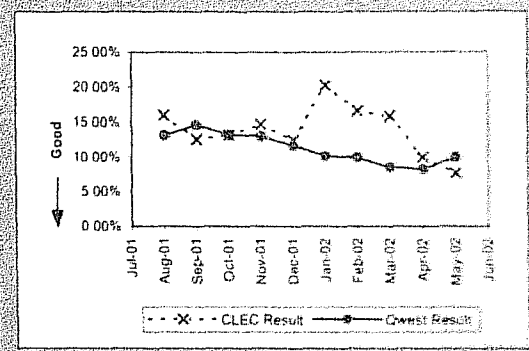
			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
			20.50%	40.37%	102	788	12.94%	2.41	0.46
			15.29%	35.99%	134	966	13.87%	0.48	-0.71
			16.03%	36.69%	105	732	14.34%	0.51	-0.69
			15.67%	36.35%	98	746	13.14%	0.79	-0.52
			14.07%	34.78%	76	634	11.99%	0.68	-0.59
			13.85%	34.54%	68	573	11.87%	0.48	-0.71
			26.83%	46.61%	60	632	9.49%	2.7	0.64
			17.02%	37.56%	59	553	10.67%	1.28	-0.22
			20.37%	40.28%	52	548	9.49%	2.28	0.39
			11.11%	31.43%	55	591	9.31%	0.43	-0.74
			11.11%	31.43%	55	597	9.21%	0.38	-0.77
			3.70%	18.89%	62	581	10.67%	-1.15	-1.7



Checklist #14 - Resale - Centrex Repair

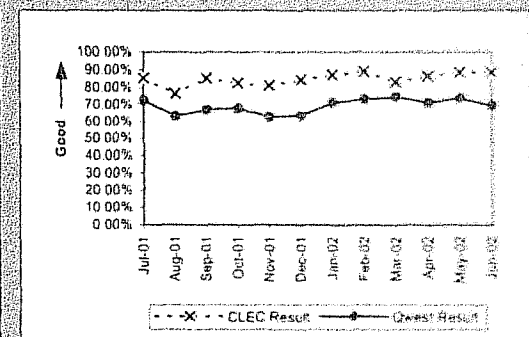
Repair Repeat Report Rate (Percent) (MR-7A*) (Parity)-- Dispatches Within MSAs

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	17	131	16.03%	36.69%	106	804	13.18%	0.88	-0.46
	12	95	12.63%	33.22%	88	599	14.69%	-0.53	-1.32
	13	98	13.27%	33.92%	83	627	13.24%	0.03	-0.98
	19	115	14.78%	35.49%	66	506	13.04%	0.5	-0.69
	7	56	12.50%	33.07%	56	477	11.74%	0.2	-0.88
	12	59	20.34%	40.25%	55	539	10.20%	2.17	0.32
	7	42	16.67%	37.27%	46	462	9.96%	1.3	-0.21
	7	44	15.91%	36.58%	39	457	8.53%	1.52	-0.07
	3	40	10.00%	30.00%	42	506	8.30%	0.41	-0.75
	2	26	7.69%	26.65%	52	518	10.04%	-0.39	-1.24



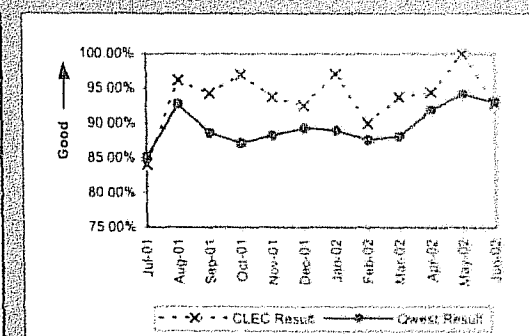
Repair Appointments Met (Percent) (MR-9A) (Parity)-- Dispatches Within MSAs

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	131	160	85.63%	35.08%	556	764	72.77%	-3.32	-3.02
	119	155	76.77%	42.23%	582	919	63.33%	-3.21	-2.95
	112	131	85.50%	35.21%	464	693	66.96%	-4.14	-3.52
	131	134	82.84%	37.71%	477	702	67.95%	-3.38	-3.06
	109	134	81.34%	38.96%	384	612	62.75%	-4.03	-3.45
	55	65	84.62%	36.08%	353	555	63.60%	-3.33	-3.03
	49	72	87.50%	33.07%	424	597	71.02%	-2.91	-2.77
	42	47	89.36%	30.83%	383	522	73.37%	-2.38	-2.44
	45	54	83.33%	37.27%	390	523	74.57%	-1.41	-1.86
	38	45	86.67%	33.99%	399	560	71.25%	-2.2	-2.34
	24	27	88.89%	31.43%	416	582	74.02%	-1.72	-2.05
	24	27	88.89%	31.43%	386	555	69.55%	-2.13	-2.3



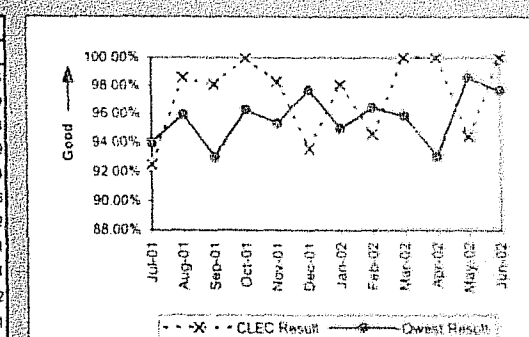
Trouble Reports Cleared within 24 hours (Percent) (MR-3B) (Parity)-- Dispatches Outside MSAs

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	37	44	84.09%	36.58%	126	148	85.14%	0.18	-0.89
	50	52	96.15%	19.23%	179	193	92.75%	-0.84	-1.51
	33	35	94.29%	23.21%	132	149	88.59%	-0.95	-1.58
	32	33	96.97%	17.14%	109	125	87.20%	-1.49	-1.91
	30	32	93.75%	24.21%	75	85	88.24%	-0.83	-1.5
	25	27	92.59%	26.19%	92	103	89.32%	-0.49	-1.3
	33	34	97.06%	16.90%	81	91	89.01%	-1.28	-1.78
	18	20	90.00%	30.00%	71	81	87.65%	-0.29	-1.17
	30	32	93.75%	24.21%	97	110	88.18%	-0.86	-1.52
	17	18	94.44%	22.91%	80	87	91.95%	-0.35	-1.21
	16	16	100.00%	0.00%	97	103	94.17%	-0.93	-1.56
	13	14	92.86%	25.75%	93	100	93.00%	0.04	-0.98



All Trouble Cleared within 48 hours (Percent) (MR-4B) (Parity)-- Dispatches Outside MSAs

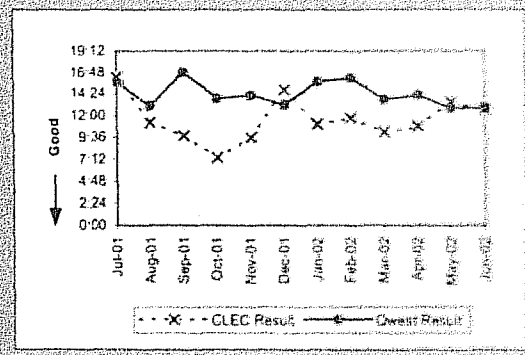
	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	62	67	92.54%	26.28%	187	199	93.97%	0.42	-0.75
	68	75	90.67%	29.07%	238	248	95.97%	-0.98	-1.59
	57	58	98.11%	13.61%	174	187	93.05%	-1.28	-1.78
	42	42	100.00%	0.00%	156	162	96.30%	-1.13	-1.69
	57	58	98.28%	13.02%	123	129	95.35%	-0.88	-1.53
	44	47	93.62%	24.44%	127	130	97.69%	1.22	-0.26
	51	52	98.08%	13.73%	114	120	95.00%	-0.85	-1.52
	33	37	94.59%	22.61%	108	112	96.43%	0.48	-0.71
	49	49	100.00%	0.00%	139	145	95.86%	-1.16	-1.71
	31	31	100.00%	0.00%	108	116	93.10%	-1.35	-1.82
	17	18	94.44%	22.91%	139	141	98.58%	0.96	-0.41
	19	19	100.00%	0.00%	124	127	97.64%	-0.62	-1.38



Checklist #14 - Resale - Centrex Repair

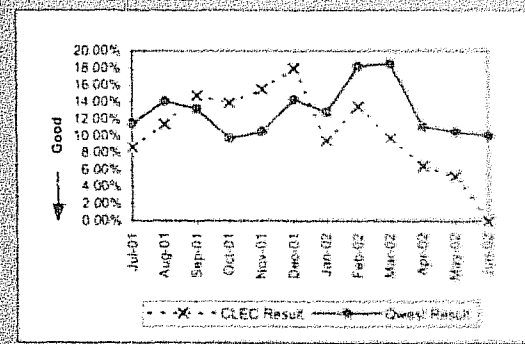
Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	[illegible]	67	16:18	16:42	3124:55	199	15:42	0.71	-0.57
[illegible]	[illegible]	70	11:14	10:52	3240:40	248	13:04	-0.93	-1.57
[illegible]	[illegible]	53	9:49	9:39	3152:39	187	16:52	-0.96	-1.58
[illegible]	[illegible]	42	7:25	8:44	2251:29	162	13:54	-2.05	-2.24
[illegible]	[illegible]	58	9:35	11:54	1832:55	129	14:13	-2.12	-2.29
[illegible]	[illegible]	47	14:51	17:21	1711:22	130	13:10	0.82	-0.5
[illegible]	[illegible]	52	11:03	11:03	1891:10	120	15:46	-0.73	-1.44
[illegible]	[illegible]	37	11:44	16:54	1812:44	112	16:11	-1.62	-1.96
[illegible]	[illegible]	46	10:12	8:34	1995:54	145	13:46	-0.98	-1.6
[illegible]	[illegible]	31	10:50	8:55	1650:56	116	14:14	-1.01	-1.61
[illegible]	[illegible]	18	13:29	16:13	1806:58	141	12:49	0.34	-0.8
[illegible]	[illegible]	18	12:38	11:28	1632:26	127	12:51	-0.07	-1.04



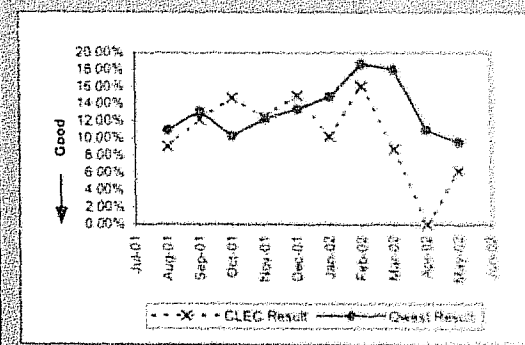
Repair Repeat Report Rate (Percent) (MR-7B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	6	69	8.70%	28.18%	23	200	11.50%	-0.63	-1.38
[illegible]	8	70	11.43%	31.82%	36	255	14.12%	-0.57	-1.35
[illegible]	8	54	14.81%	35.52%	25	189	13.23%	0.3	-0.82
[illegible]	6	43	13.95%	34.65%	16	164	9.76%	0.78	-0.52
[illegible]	9	58	15.52%	36.21%	14	133	10.53%	0.96	-0.42
[illegible]	9	50	18.00%	38.42%	19	133	14.29%	0.62	-0.62
[illegible]	5	53	9.43%	29.23%	16	125	12.80%	-0.61	-1.37
[illegible]	5	37	13.51%	34.19%	21	115	18.26%	-0.65	-1.4
[illegible]	4	41	9.76%	29.67%	27	146	18.49%	-1.27	-1.77
[illegible]	2	31	6.45%	24.57%	13	117	11.11%	-0.73	-1.45
[illegible]	1	19	5.26%	22.33%	15	143	10.49%	-0.7	-1.42
[illegible]	0	18	0.00%	0.00%	13	130	10.00%	-1.33	-1.81



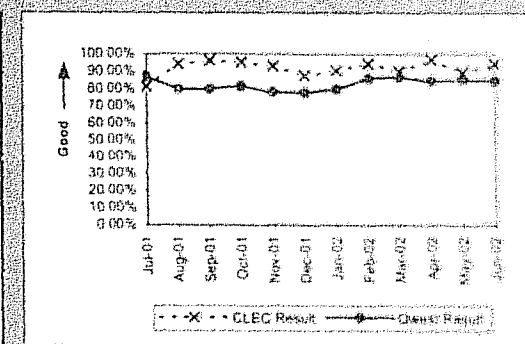
Repair Repeat Report Rate (Percent) (MR-7B*) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]									
[illegible]	5	55	9.09%	28.75%	22	201	10.95%	-0.39	-1.24
[illegible]	5	41	12.20%	32.72%	20	152	13.16%	-0.16	-1.1
[illegible]	5	34	14.71%	35.42%	14	136	10.29%	0.69	-0.58
[illegible]	6	48	12.50%	33.07%	13	106	12.26%	0.04	-0.97
[illegible]	6	40	15.00%	35.71%	15	112	13.39%	0.25	-0.85
[illegible]	4	39	10.26%	30.34%	16	108	14.81%	-0.69	-1.42
[illegible]	5	31	16.13%	36.78%	17	91	18.68%	-0.31	-1.19
[illegible]	3	34	8.82%	28.36%	22	122	18.03%	-1.24	-1.75
[illegible]	0	19	0.00%	0.00%	11	100	11.00%	-1.4	-1.85
[illegible]	1	16	6.25%	24.21%	12	125	9.60%	-0.43	-1.26
[illegible]									



Repair Appointments Met (Percent) (MR-9B) (Parity)-- Dispatches Outside MSAs

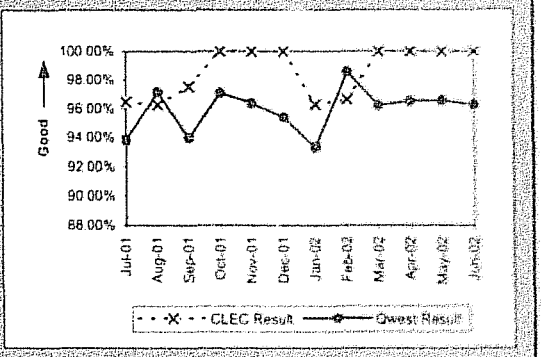
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	56	69	81.16%	39.10%	173	199	86.93%	1.15	-0.3
[illegible]	68	70	94.29%	23.21%	202	253	79.84%	-2.67	-2.62
[illegible]	52	54	96.30%	18.89%	150	188	79.79%	-2.66	-2.62
[illegible]	41	43	95.35%	21.06%	133	163	81.60%	-2.07	-2.26
[illegible]	54	58	93.10%	25.34%	104	133	78.20%	-2.29	-2.30
[illegible]	44	50	88.00%	32.50%	102	131	77.86%	-1.47	-1.89
[illegible]	48	53	90.57%	29.23%	99	124	79.84%	-1.63	-1.99
[illegible]	35	37	94.59%	22.61%	99	115	86.09%	-1.3	-1.79
[illegible]	37	41	90.24%	29.67%	125	144	86.81%	-0.57	-1.35
[illegible]	30	31	96.77%	17.67%	98	116	84.48%	-1.68	-2.02
[illegible]	17	19	89.47%	30.69%	122	143	85.31%	-0.48	-1.29
[illegible]	17	18	94.44%	22.91%	109	129	84.50%	-1.09	-1.66



Checklist #14 - Resale - Centrex Repair

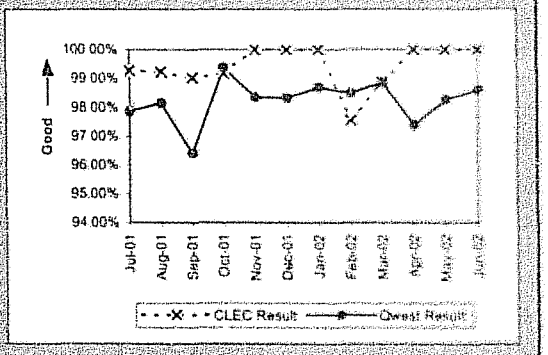
Out of Service Cleared within 24 hours (Percent) (MR-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	55	57	96.49%	18.40%	304	324	93.83%	-0.77	-1.47
Aug-01	52	54	96.30%	18.89%	377	388	97.16%	0.39	-0.76
Sep-01	40	41	97.56%	15.43%	202	215	93.95%	-0.89	-1.54
Oct-01	46	46	100.00%	0.00%	235	242	97.11%	-1.09	-1.66
Nov-01	48	48	100.00%	0.00%	240	249	96.39%	-1.23	-1.75
Dec-01	34	34	100.00%	0.00%	186	195	95.38%	-1.18	-1.72
Jan-02	27	27	96.30%	18.89%	223	239	93.31%	-0.59	-1.36
Feb-02	29	30	96.67%	17.95%	208	211	98.58%	0.67	-0.59
Mar-02	33	33	100.00%	0.00%	230	239	96.23%	-1.07	-1.65
Apr-02	31	31	100.00%	0.00%	222	230	96.52%	-0.99	-1.6
May-02	13	13	100.00%	0.00%	226	234	96.58%	-0.66	-1.4
Jun-02	24	24	100.00%	0.00%	182	189	96.30%	-0.91	-1.55



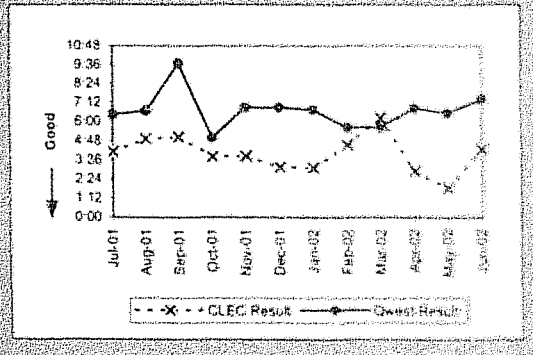
All Troubles Cleared within 48 hours (Percent) (MR-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	138	139	99.28%	8.45%	551	563	97.87%	-1.03	-1.63
Aug-01	130	131	99.24%	8.70%	641	653	98.16%	-0.84	-1.51
Sep-01	102	103	99.03%	9.81%	405	420	96.43%	-1.27	-1.77
Oct-01	121	122	99.18%	9.02%	473	476	99.37%	0.23	-0.86
Nov-01	149	149	100.00%	0.00%	476	484	98.35%	-1.38	-1.84
Dec-01	97	97	100.00%	0.00%	353	359	98.33%	-1.14	-1.69
Jan-02	86	86	100.00%	0.00%	452	458	98.69%	-0.98	-1.6
Feb-02	80	82	97.56%	15.43%	394	400	98.50%	0.61	-0.63
Mar-02	88	89	98.88%	10.54%	430	435	98.85%	-0.02	-1.01
Apr-02	60	60	100.00%	0.00%	451	463	97.41%	-1.35	-1.82
May-02	51	51	100.00%	0.00%	453	461	98.26%	-0.9	-1.55
Jun-02	50	50	100.00%	0.00%	352	357	98.60%	-0.79	-1.48



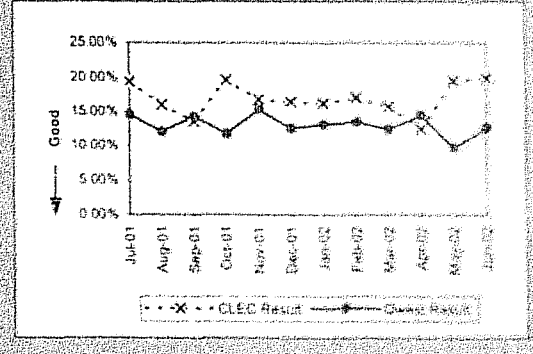
Mean Time to Restore (Hours:Minutes) (MR-8C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	573:27	139	4:08	7:23	3626:28	563	6:26	-1.83	-2.11
Aug-01	648:07	131	4:57	8:49	4355:19	653	6:40	-0.71	-1.43
Sep-01	520:03	103	5:03	10:56	4080:09	420	9:43	-0.77	-1.47
Oct-01	467:59	122	3:50	7:47	2383:26	476	5:00	-0.96	-1.58
Nov-01	576:07	149	3:52	6:11	3323:09	484	6:52	-1.25	-1.76
Dec-01	308:48	97	3:11	5:32	2476:27	359	6:54	-2.49	-2.51
Jan-02	208:54	86	3:08	5:15	3085:55	458	6:44	-2.03	-2.24
Feb-02	372:54	82	4:33	10:51	2254:56	400	5:38	-0.44	-1.27
Mar-02	554:44	89	6:14	10:34	2464:39	435	5:40	0.51	-0.69
Apr-02	233:53	60	3:55	6:23	3160:44	463	6:50	-1.29	-1.78
May-02	94:26	51	1:51	3:25	3011:44	461	6:32	-1.57	-1.96
Jun-02	214:16	50	4:17	6:28	2650:03	357	7:25	-0.95	-1.58



Repair Repeat Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

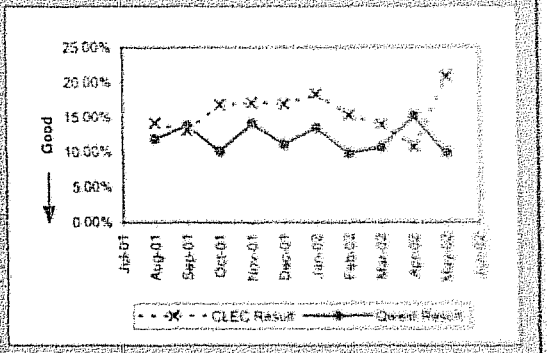
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	27	139	19.42%	39.56%	82	563	14.56%	1.39	-0.15
Aug-01	21	131	16.03%	36.69%	79	653	12.10%	1.21	-0.26
Sep-01	14	103	13.59%	34.27%	60	420	14.29%	-0.18	-1.11
Oct-01	24	122	19.67%	39.75%	56	476	11.76%	2.2	0.34
Nov-01	25	149	16.78%	37.37%	74	484	15.29%	0.44	-0.73
Dec-01	16	97	16.49%	37.11%	45	359	12.53%	1.01	-0.39
Jan-02	14	86	16.28%	36.92%	60	458	13.10%	0.79	-0.52
Feb-02	14	82	17.07%	37.63%	54	400	13.50%	0.84	-0.49
Mar-02	14	89	15.73%	36.41%	54	435	12.41%	0.85	-0.49
Apr-02	10	60	16.50%	33.07%	67	463	14.47%	-0.46	-1.28
May-02	10	51	19.61%	39.70%	45	461	9.76%	2	0.21
Jun-02	10	50	20.00%	40.00%	45	357	12.61%	1.38	-0.16



Checklist #14 - Resale - Centrex Repair

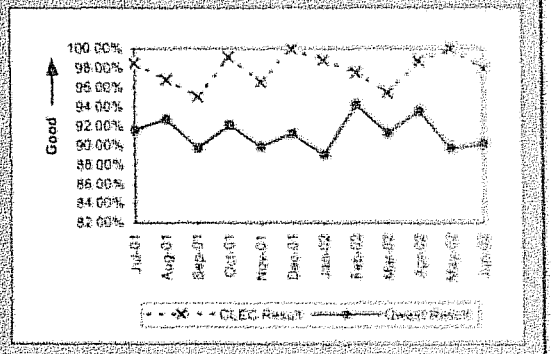
Repair Repeat Report Rate (Percent) (MR-7C*) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	12	84	14.29%	34.99%	55	462	11.90%	0.62	-0.63
Sep-01	8	61	13.11%	33.76%	41	296	13.85%	-0.15	-1.09
Oct-01	12	71	16.90%	37.48%	35	347	10.09%	1.59	-0.03
Nov-01	12	99	17.17%	37.71%	50	352	14.20%	0.73	-0.55
Dec-01	9	53	16.98%	37.55%	25	226	11.06%	1.16	-0.3
Jan-02	9	49	18.37%	38.72%	43	318	13.52%	0.9	-0.45
Feb-02	6	39	15.38%	36.08%	23	234	9.83%	1	-0.39
Mar-02	7	50	14.00%	34.70%	30	281	10.68%	0.69	-0.58
Apr-02	4	37	10.81%	31.05%	46	302	15.23%	-0.71	-1.43
May-02	5	24	20.83%	40.61%	28	286	9.79%	1.55	-0.06
Jun-02									



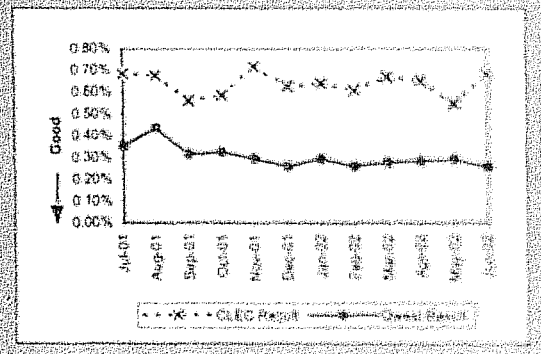
Repair Appointments Met (Percent) (MR-9C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	135	137	98.54%	11.99%	469	512	91.60%	-2.6	-2.58
Aug-01	124	128	96.88%	17.40%	526	567	92.77%	-1.62	-1.98
Sep-01	97	102	95.10%	21.59%	333	371	89.76%	-1.58	-1.96
Oct-01	121	122	99.18%	9.02%	376	408	92.16%	-2.53	-2.54
Nov-01	143	148	96.62%	18.07%	375	417	89.93%	-2.32	-2.41
Dec-01	97	97	100.00%	0.00%	301	330	91.21%	-2.69	-2.63
Jan-02	85	86	98.84%	10.72%	351	394	89.09%	-2.63	-2.6
Feb-02	80	82	97.56%	15.43%	328	348	94.25%	-1.16	-1.7
Mar-02	85	89	95.51%	20.72%	346	379	91.29%	-1.27	-1.77
Apr-02	79	80	98.75%	11.11%	396	423	93.62%	-1.72	-2.05
May-02	51	51	100.00%	0.00%	367	409	89.73%	-2.28	-2.38
Jun-02	49	50	98.00%	14.00%	283	314	90.13%	-1.73	-2.05



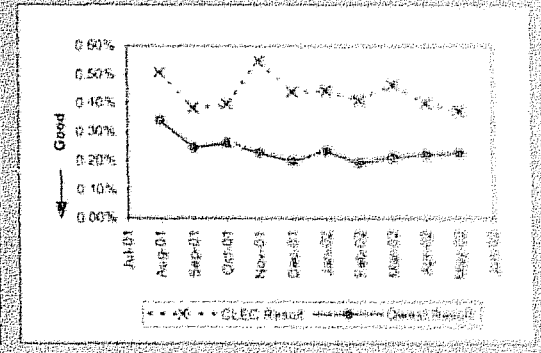
Trouble Rate (Percent) (MR-8) (Parity)

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	369	54673	0.68%	8.23%	1551	436656	0.36%	12.06	6.33
Aug-01	358	53010	0.68%	8.19%	1874	430212	0.44%	7.91	3.81
Sep-01	288	51462	0.56%	7.46%	1341	426464	0.31%	9.38	4.71
Oct-01	299	50984	0.59%	7.64%	1386	424339	0.33%	9.72	4.91
Nov-01	342	47654	0.72%	8.44%	1251	421670	0.30%	16.02	8.74
Dec-01	212	33875	0.63%	7.89%	1065	410554	0.26%	12.74	6.75
Jan-02	211	33016	0.64%	7.97%	1215	410648	0.30%	11.05	5.72
Feb-02	166	27272	0.61%	7.78%	1056	406850	0.26%	10.82	5.58
Mar-02	184	27540	0.67%	8.15%	1129	404607	0.28%	11.84	6.2
Apr-02	156	23944	0.65%	8.05%	1171	407787	0.29%	10.24	5.23
May-02	97	17753	0.55%	7.37%	1201	410864	0.29%	6.14	2.73
Jun-02	95	13949	0.68%	8.22%	1068	412560	0.25%	9.65	4.87



Trouble Rate (Percent) (MR-8*) (Parity)

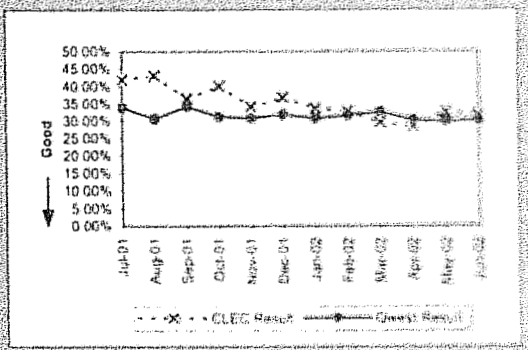
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	270	53010	0.51%	7.12%	1467	430212	0.34%	6.27	2.81
Sep-01	197	51462	0.38%	6.18%	1047	426464	0.25%	5.95	2.61
Oct-01	203	50984	0.40%	6.30%	1110	424339	0.26%	5.7	2.47
Nov-01	262	47654	0.55%	7.39%	964	421670	0.23%	13.92	7.46
Dec-01	149	33875	0.44%	6.62%	815	410554	0.20%	9.59	4.83
Jan-02	147	33016	0.45%	6.66%	965	410648	0.24%	7.59	3.61
Feb-02	112	27272	0.41%	6.40%	787	406850	0.19%	7.9	3.81
Mar-02	128	27540	0.46%	6.80%	860	404607	0.21%	8.79	4.35
Apr-02	96	23944	0.40%	6.32%	908	407787	0.22%	5.69	2.46
May-02	66	17753	0.37%	6.09%	929	410864	0.23%	4	1.43
Jun-02									



Checklist #14 - Resale - Centrex Repair

Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)

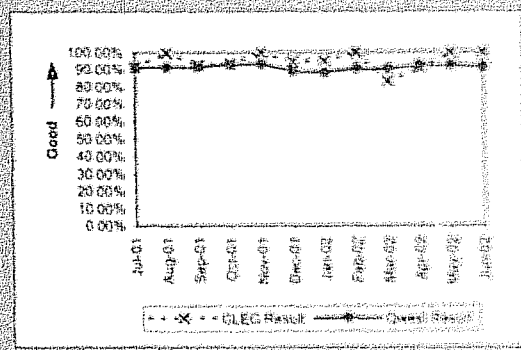
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	267	636	41 98%	49 35%	795	2346	33.89%	3 82	1 33
Aug-01	272	630	43 17%	49 53%	827	2701	30.62%	6 16	2 74
Sep-01	166	454	36 56%	48 16%	696	2037	34 17%	0 97	-0 41
Oct-01	201	500	40 20%	49 03%	630	2016	31 25%	3 76	1 29
Nov-01	177	519	34 10%	47 41%	555	1806	30 73%	1 47	-0 11
Dec-01	124	336	36 90%	48 25%	498	1563	31 86%	1 78	0 08
Jan-02	107	318	33 65%	47 25%	539	1754	30 73%	1 03	-0 37
Feb-02	81	247	32 79%	46 95%	493	1561	31 58%	0 38	-0 77
Mar-02	77	261	29 50%	45 61%	546	1675	32 60%	-0 99	-1 6
Apr-02	62	218	28 44%	45 11%	507	1678	30 21%	-0 54	-1 33
May-02	47	144	32 64%	46 89%	511	1712	29 85%	0 7	-0 57
Jun-02	44	139	31 65%	46 51%	465	1533	30 33%	0 33	-0 8



Checklist #14 - Resale - Centrex 21 Installation

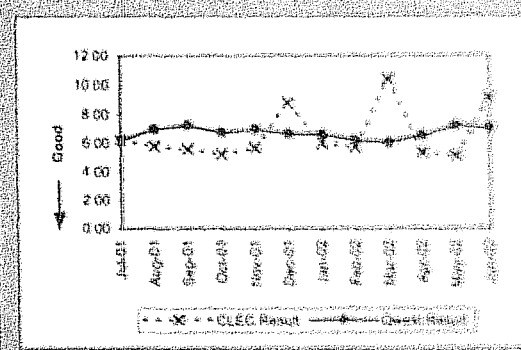
Installation Commitments Met (Percent) (OP-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	33	36	91.67%	27.64%	1466	1607	91.23%	-0.09	-1.05
Aug-01	27	27	100.00%	0.00%	1506	1643	91.66%	-1.55	-1.95
Sep-01	13	14	92.86%	25.75%	1296	1414	91.65%	-0.16	-1.1
Oct-01	29	31	93.55%	24.57%	1569	1685	93.12%	-0.09	-1.06
Nov-01	23	23	100.00%	0.00%	1321	1413	93.49%	-1.26	-1.76
Dec-01	19	20	95.00%	21.79%	1133	1271	89.14%	-0.84	-1.51
Jan-02	21	22	95.45%	20.83%	1209	1366	88.51%	-1.01	-1.62
Feb-02	25	25	100.00%	0.00%	1203	1329	90.52%	-1.6	-1.97
Mar-02	10	12	83.33%	37.27%	1262	1395	90.47%	0.81	-0.51
Apr-02	10	11	90.91%	28.75%	1269	1376	92.22%	0.23	-0.86
May-02	14	14	100.00%	0.00%	1280	1384	92.49%	-1.06	-1.65
Jun-02	17	17	100.00%	0.00%	1153	1263	91.29%	-1.27	-1.77



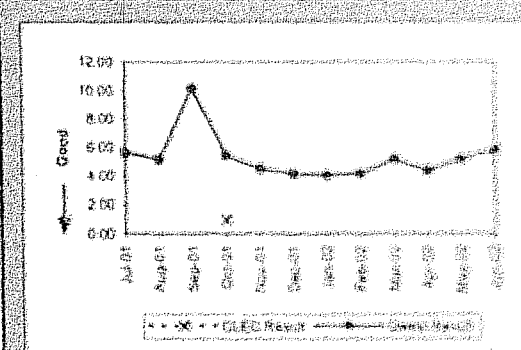
Installation Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	224	36	6.22	3.31	10076	1633	6.17	1.51	-0.08
Aug-01	157	27	5.81	2.86	11689	1669	7.00	-0.65	-1.4
Sep-01	84	15	5.60	2.06	10425	1436	7.26	-0.62	-1.38
Oct-01	162	31	5.23	3.10	11535	1710	6.75	-0.87	-1.53
Nov-01	131	23	5.70	5.37	10025	1437	6.98	-0.66	-1.4
Dec-01	176	20	8.80	12.15	8590	1284	6.69	1.17	-0.29
Jan-02	133	22	6.05	2.68	9239	1393	6.63	-0.27	-1.18
Feb-02	138	24	5.75	2.86	8378	1346	6.22	-0.28	-1.17
Mar-02	125	12	10.42	11.09	8549	1411	6.06	1.85	0.13
Apr-02	59	11	5.36	2.50	9163	1397	6.56	-0.41	-1.25
May-02	72	14	5.14	1.83	10134	1401	7.23	-0.78	-1.48
Jun-02	155	17	9.12	8.94	9101	1289	7.06	0.99	-0.4



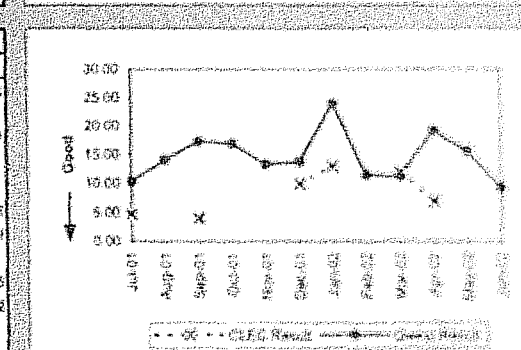
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-1) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01					493	87	5.67		
Aug-01					394	76	5.18		
Sep-01					791	78	10.14		
Oct-01	2	2	1.00	0.00	383	70	5.47	-0.68	-1.41
Nov-01					348	77	4.52		
Dec-01					345	83	4.16		
Jan-02					503	124	4.06		
Feb-02					364	87	4.18		
Mar-02					507	98	5.17		
Apr-02					351	80	4.39		
May-02					385	74	5.20		
Jun-02					422	72	5.86		



Delayed Days for Facility Reasons (Average Days) (OP-6B-1) (Parity)-- Dispatches Within MSAs

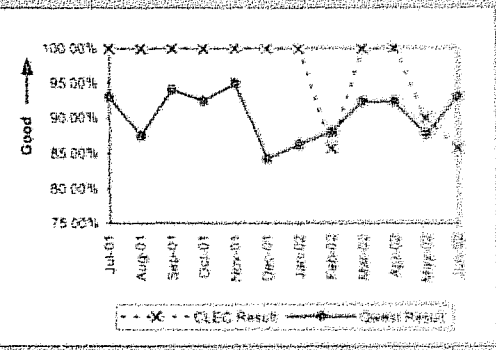
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	14	3	4.67	3.79	695	67	10.37	-0.78	-1.43
Aug-01					1031	73	14.12		
Sep-01	4	1	4.00		1091	58	17.26	-0.62	-1.37
Oct-01					1047	62	16.89		
Nov-01					533	40	13.32		
Dec-01	10	1	10.00		840	61	13.77	-0.25	-1.18
Jan-02	13	1	13.00		934	39	23.95	-0.31	-1.19
Feb-02					483	42	11.50		
Mar-02	24	2	12.00	2.83	438	39	11.23	0.41	-0.75
Apr-02	7	1	7.00		616	32	19.25	-0.37	-1.22
May-02					514	33	15.58		
Jun-02					387	42	9.21		



Checklist #14 - Resale - Centrex 21 Installation

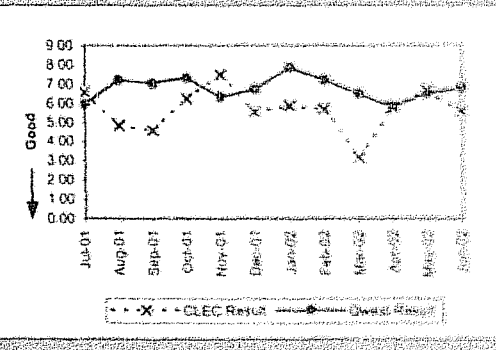
Installation Commitments Met (Percent) (OP-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	10	10	100.00%	0.00%	226	243	93.00%	-0.65	-1.52
Aug-01	5	5	100.00%	0.00%	176	201	87.56%	-0.83	-1.51
Sep-01	5	5	100.00%	0.00%	190	202	94.06%	-0.55	-1.34
Oct-01	12	12	100.00%	0.00%	233	252	92.46%	-0.97	-1.55
Nov-01	2	2	100.00%	0.00%	207	218	94.95%	-0.32	-1.2
Dec-01	7	7	100.00%	0.00%	145	172	84.30%	-1.12	-1.68
Jan-02	10	10	100.00%	0.00%	195	226	86.28%	-1.23	-1.75
Feb-02	6	7	85.71%	34.99%	176	200	88.00%	0.22	-0.87
Mar-02	8	8	100.00%	0.00%	203	220	92.27%	-0.7	-1.43
Apr-02	11	11	100.00%	0.00%	203	220	92.27%	-0.94	-1.57
May-02	9	10	90.00%	30.00%	192	219	87.67%	-0.22	-1.13
Jun-02	6	7	85.71%	34.99%	158	170	92.94%	0.65	-0.6



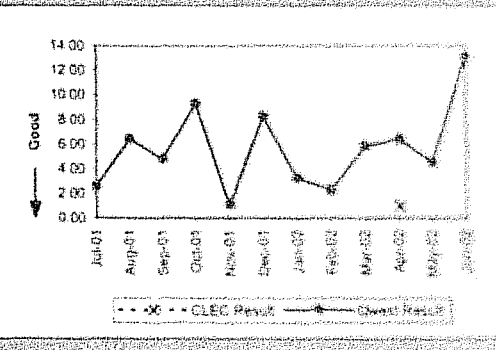
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	66	10	6.60	3.03	1457	244	5.97	1.7	0.03
Aug-01	29	5	4.83	0.41	1473	204	7.22	-0.51	-1.31
Sep-01	23	5	4.60	0.89	1438	204	7.05	-0.58	-1.36
Oct-01	76	12	6.25	3.52	1866	255	7.32	-0.34	-1.21
Nov-01	15	2	7.50	3.54	1398	220	6.35	1.51	-0.08
Dec-01	39	7	5.57	2.51	1173	174	6.74	-0.38	-1.23
Jan-02	59	10	5.90	3.25	1793	228	7.86	-0.49	-1.3
Feb-02	40	7	5.71	1.98	1459	202	7.22	-0.37	-1.22
Mar-02	19	6	3.17	1.72	1435	220	6.52	-0.67	-1.41
Apr-02	70	12	5.83	3.24	1294	222	5.83	0.11	-0.93
May-02	67	10	6.70	4.69	1447	222	6.52	0.27	-0.83
Jun-02	39	7	5.57	3.41	1174	173	6.79	-0.34	-1.2



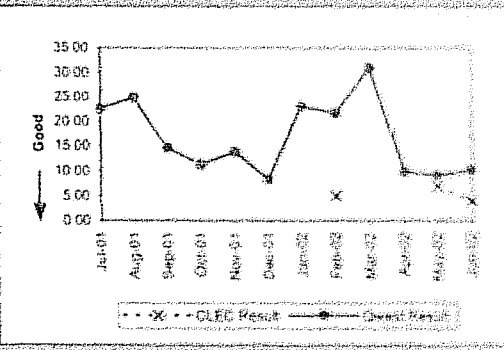
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					26	10	2.60		
Aug-01					71	11	6.45		
Sep-01					29	6	4.83		
Oct-01					121	13	9.31		
Nov-01					8	7	1.14		
Dec-01					116	14	8.29		
Jan-02					59	18	3.28		
Feb-02					30	13	2.31		
Mar-02					53	9	5.89		
Apr-02	1	1	1.00		77	12	6.42	-1.01	-1.61
May-02					69	15	4.60		
Jun-02					92	7	13.14		



Delayed Days for Facility Reasons (Average Days) (OP-6B-2) (Parity)-- Dispatches Outside MSAs

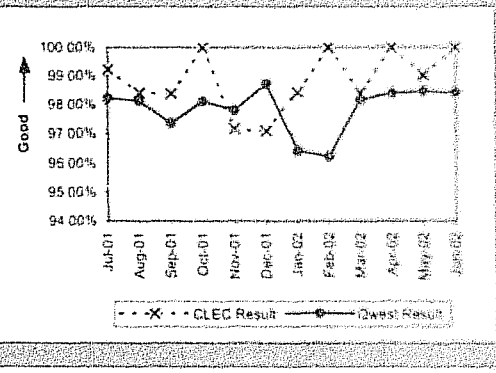
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					158	7	22.57		
Aug-01					373	15	24.87		
Sep-01					87	6	14.50		
Oct-01					90	8	11.25		
Nov-01					83	6	13.83		
Dec-01					108	13	8.31		
Jan-02					301	13	23.15		
Feb-02	5	1	5.00		260	12	21.67	-0.6	-1.37
Mar-02					248	8	31.00		
Apr-02					49	5	9.80		
May-02	7	1	7.00		110	12	9.17	-0.27	-1.16
Jun-02	4	1	4.00		61	6	10.17	-0.92	-1.55



Checklist #14 - Resale - Centrex 21 Installation

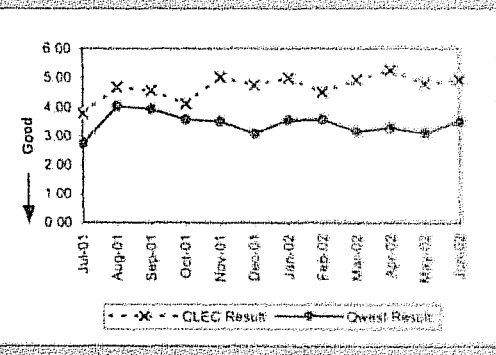
Installation Commitments Met (Percent) (OP-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	130	131	99.24%	8.70%	3788	3856	98.24%	-0.86	-1.52
Aug-01	62	63	98.41%	12.50%	1465	1493	98.12%	-0.17	-1.1
Sep-01	61	62	98.39%	12.60%	1182	1214	97.36%	-0.49	-1.3
Oct-01	75	75	100.00%	0.00%	1660	1692	98.11%	-1.18	-1.72
Nov-01	69	71	97.18%	16.55%	1203	1230	97.80%	0.4	-0.76
Dec-01	67	69	97.10%	16.78%	935	947	98.73%	1.03	-0.37
Jan-02	63	64	98.44%	12.40%	892	925	96.43%	-0.84	-1.51
Feb-02	55	55	100.00%	0.00%	1049	1090	96.24%	-1.47	-1.89
Mar-02	62	63	98.41%	12.50%	967	985	98.17%	-0.14	-1.08
Apr-02	76	76	100.00%	0.00%	796	809	98.39%	-1.07	-1.65
May-02	102	103	99.03%	9.81%	1029	1045	98.47%	-0.44	-1.27
Jun-02	98	98	100.00%	0.00%	871	885	98.42%	-1.19	-1.72



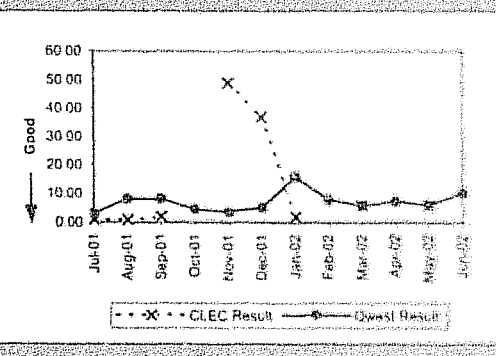
Installation Interval (Average Days) (OP-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	452	119	3.80	1.59	9047	3294	2.75	6.37	2.87
Aug-01	256	55	4.69	0.94	4884	1206	4.05	1.71	0.04
Sep-01	215	47	4.57	1.06	3038	767	3.96	1.17	-0.29
Oct-01	240	58	4.14	1.32	3709	1033	3.59	1.64	0
Nov-01	337	67	5.03	6.19	3162	896	3.53	1.46	-0.11
Dec-01	300	63	4.76	1.57	2130	692	3.08	3.72	1.26
Jan-02	255	51	5.00	1.04	2117	593	3.57	1.73	0.05
Feb-02	203	45	4.51	1.14	2859	799	3.58	1.43	-0.13
Mar-02	230	47	4.94	1.24	2081	657	3.17	1.6	-0.03
Apr-02	303	59	5.24	2.92	1898	579	3.28	3.72	1.26
May-02	403	84	4.80	1.21	2444	783	3.12	3.72	1.26
Jun-02	452	92	4.91	0.99	2105	601	3.50	1.09	-0.34



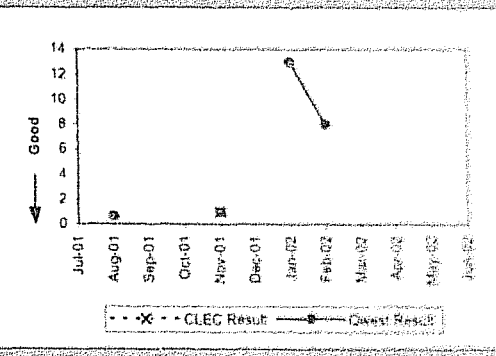
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-3) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	1	1	1.00		222	72	3.08	-0.59	-1.36
Aug-01	1	1	1.00		245	30	8.17	-0.51	-1.31
Sep-01	2	1	2.00		327	40	8.18	-0.59	-1.36
Oct-01					154	34	4.53		
Nov-01	49	1	49.00		111	31	3.58	3.72	1.26
Dec-01	111	3	37.00	53.02	71	14	5.07	1.62	-0.02
Jan-02	2	1	2.00		639	40	15.98	-0.34	-1.21
Feb-02					313	39	8.03		
Mar-02	6	1	6.00		108	18	6.00	0	-1
Apr-02					95	13	7.31		
May-02	6	1	6.00		105	17	6.18	-0.02	-1.01
Jun-02					143	14	10.21		



Delayed Days for Facility Reasons (Average Days) (OP-6B-3) (Parity)-- No Dispatches

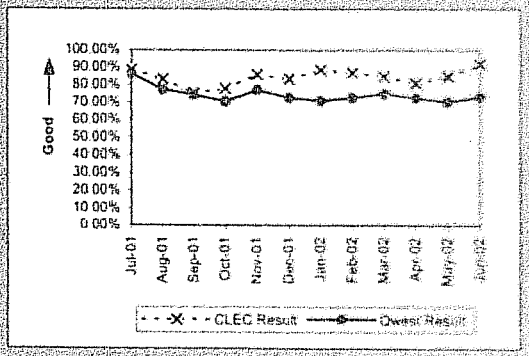
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					2	3	0.67		
Sep-01									
Oct-01									
Nov-01	1	1	1.00		2	2	1.00		
Dec-01									
Jan-02					13	1	13.00		
Feb-02					16	2	8.00		
Mar-02									
Apr-02									
May-02									
Jun-02									



Checklist #14 - Resale - Centrex 21 Installation

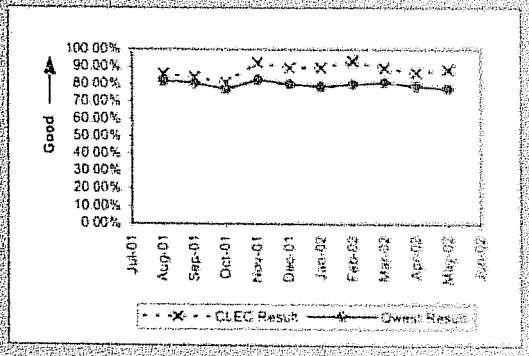
New Service Installation Quality (Percent) (OP-5) (Parity)

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	210	237	88.61%	31.77%	5744	6666	86.17%	-1.07	-1.65
Aug-01	114	137	83.21%	37.38%	3517	4564	77.06%	-1.69	-2.03
Sep-01	65	69	75.28%	43.14%	2322	3123	74.35%	-0.2	-1.12
Oct-01	78	100	78.00%	41.42%	2303	3263	70.58%	-1.6	-1.98
Nov-01	92	107	85.98%	34.72%	2528	3278	77.12%	-2.15	-2.31
Dec-01	81	97	83.51%	37.11%	1928	2652	72.70%	-2.35	-2.43
Jan-02	86	97	88.66%	31.71%	1760	2483	70.88%	-3.78	-3.3
Feb-02	81	93	87.10%	33.52%	1891	2601	72.70%	-3.06	-2.86
Mar-02	73	86	84.88%	35.82%	1972	2632	74.92%	-2.1	-2.27
Apr-02	73	90	81.11%	39.14%	1832	2527	72.50%	-1.8	-2.09
May-02	96	113	84.96%	35.75%	1796	2554	70.32%	-3.33	-3.03
Jun-02	115	125	92.00%	27.13%	1640	2512	73.25%	-4.62	-3.81



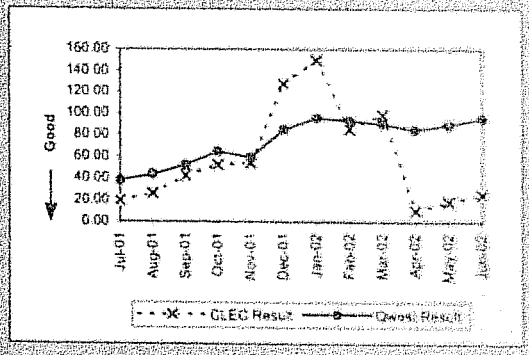
New Service Installation Quality (Percent) (OP-5) (Parity)

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	118	137	86.13%	34.56%	3731	4564	81.75%	-1.31	-1.8
Sep-01	75	69	84.27%	36.41%	2517	3123	80.60%	-0.86	-1.53
Oct-01	81	100	81.00%	39.23%	2519	3263	77.20%	-0.89	-1.54
Nov-01	99	107	92.52%	26.30%	2711	3278	82.70%	-2.64	-2.61
Dec-01	87	97	89.69%	30.41%	2124	2652	80.09%	-2.33	-2.41
Jan-02	87	97	89.69%	30.41%	1954	2483	78.70%	-2.59	-2.58
Feb-02	87	93	93.55%	24.57%	2081	2601	80.01%	-3.21	-2.95
Mar-02	77	86	89.53%	30.61%	2131	2632	80.97%	-1.99	-2.21
Apr-02	78	90	86.67%	33.99%	1996	2527	78.99%	-1.76	-2.07
May-02	100	113	88.50%	31.91%	1980	2554	77.53%	-2.73	-2.66
Jun-02									



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

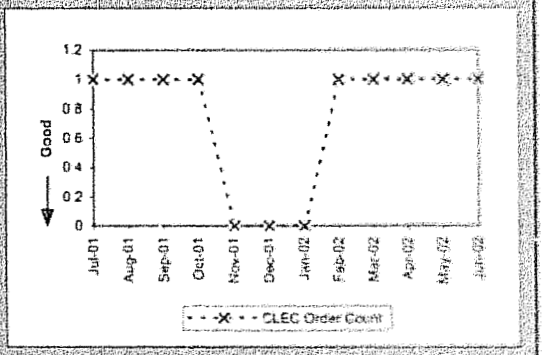
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	96	5	19.20	12.87	11797	312	37.81	-0.95	-1.58
Aug-01	334	9	26.00	21.44	15746	363	43.38	-1	-1.61
Sep-01	213	5	42.60	26.73	16397	316	51.89	-0.37	-1.22
Oct-01	315	6	52.50	35.89	18233	282	64.66	-0.48	-1.29
Nov-01	269	5	53.80	40.03	21621	366	59.07	-0.18	-1.11
Dec-01	128	1	128.00		19400	229	84.72	0.62	-0.62
Jan-02	150	1	150.00		21701	227	95.60	0.71	-0.57
Feb-02	171	2	85.50	119.50	24170	260	92.96	-0.12	-1.07
Mar-02	198	2	99.00	130.11	28393	315	90.14	0.14	-0.91
Apr-02	32	3	10.67	6.11	31352	369	84.96	-1.39	-1.85
May-02	57	3	19.00	6.56	34267	384	89.24	-1.22	-1.74
Jun-02	152	6	25.33	15.62	34877	366	95.29	-1.63	-1.89



Checklist #14 - Resale - Centrex 21 Installation

Count of Pending Orders Delayed for Facilities Reasons Centrex 21 (OP-15B) (Diagnostic)

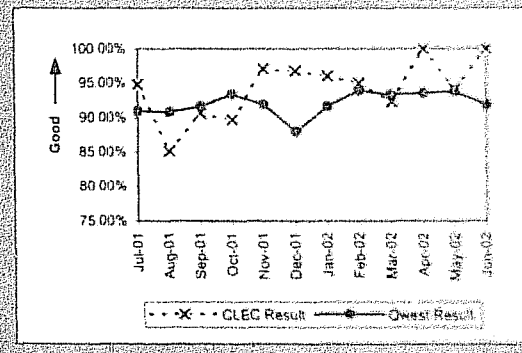
Date	CLEC Order Count
Jul-01	1
Aug-01	1
Sep-01	1
Oct-01	1
Nov-01	0
Dec-01	0
Jan-02	0
Feb-02	1
Mar-02	1
Apr-02	1
May-02	1
Jun-02	1



Checklist #14 - Resale - Centrex 21 Repair

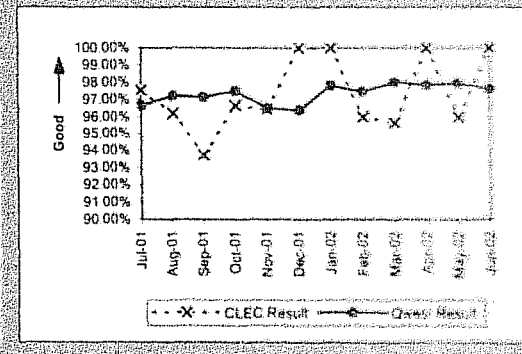
Out of Service Cleared within 24 hours (Percent) (MR-3A) (Parity)-- Dispatches Within MSAs

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	55	58	94.83%	22.15%	2612	2872	90.95%	-1.02	-1.62
Aug-01	46	54	85.19%	35.52%	2816	3100	90.84%	1.36	-0.17
Sep-01	39	43	90.70%	29.05%	2272	2478	91.69%	0.29	-0.83
Oct-01	35	39	89.74%	30.34%	2135	2286	93.39%	0.9	-0.45
Nov-01	33	34	97.06%	16.90%	1836	1998	91.89%	-1.09	-1.67
Dec-01	30	31	96.77%	17.67%	1702	1933	88.05%	-1.49	-1.9
Jan-02	24	25	96.00%	19.60%	1650	1800	91.67%	-0.78	-1.47
Feb-02	19	20	95.00%	21.79%	1579	1682	93.88%	-0.21	-1.13
Mar-02	12	13	97.31%	26.65%	1551	1662	93.32%	0.22	-0.86
Apr-02	13	17	100.00%	0.00%	1561	1669	93.53%	-1.08	-1.66
May-02	16	17	94.12%	23.53%	1815	1935	93.80%	-0.05	-1.03
Jun-02	21	21	100.00%	0.00%	1760	1917	91.81%	-1.36	-1.83



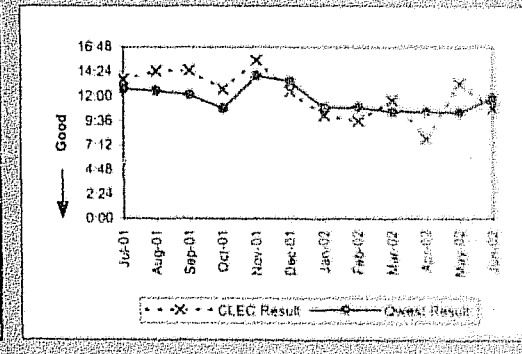
All Trouble Cleared within 48 hours (Percent) (MR-4A) (Parity)-- Dispatches Within MSAs

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	80	82	97.56%	15.43%	3616	3742	96.63%	-0.46	-1.28
Aug-01	76	79	96.20%	19.11%	3982	4096	97.22%	0.58	-0.65
Sep-01	60	64	93.75%	24.21%	3172	3265	97.15%	1.45	-0.12
Oct-01	58	60	96.67%	17.95%	3036	3114	97.50%	0.46	-0.72
Nov-01	54	56	96.43%	18.56%	2602	2696	96.51%	0.11	-0.93
Dec-01	45	45	100.00%	0.00%	2479	2572	96.38%	-1.29	-1.78
Jan-02	31	31	100.00%	0.00%	2379	2432	97.82%	-0.83	-1.5
Feb-02	24	25	96.00%	19.60%	2147	2203	97.46%	0.49	-0.7
Mar-02	22	23	95.65%	20.39%	2173	2217	98.02%	0.75	-0.55
Apr-02	26	26	100.00%	0.00%	2238	2287	97.86%	-0.75	-1.46
May-02	24	25	96.00%	19.60%	2543	2598	97.96%	0.67	-0.59
Jun-02	24	24	100.00%	0.00%	2493	2553	97.65%	-0.76	-1.46



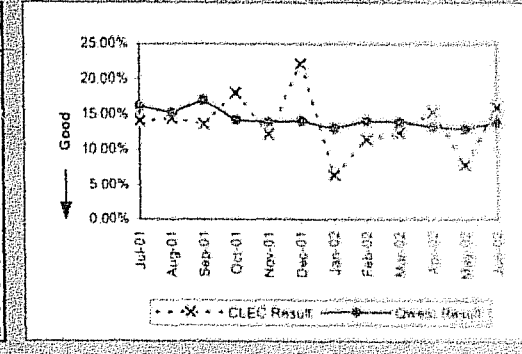
Mean Time to Restore (Hours:Minutes) (MR-6A) (Parity)-- Dispatches Within MSAs

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	1119:37	82	13:39	14:17	47662:04	3742	12:44	1.63	-0.01
Aug-01	1143:31	79	14:28	14:48	51432:06	4096	12:33	1.93	0.17
Sep-01	929:44	64	14:32	16:22	39747:01	3265	12:10	2.14	0.3
Oct-01	762:12	60	12:42	14:52	33760:50	3114	10:50	2.17	0.32
Nov-01	869:35	56	15:32	15:58	37726:43	2696	14:00	1.67	0.02
Dec-01	563:01	45	12:31	11:24	34644:44	2572	13:28	-0.39	-1.23
Jan-02	314:33	31	10:09	8:30	26584:51	2432	10:56	-0.31	-1.19
Feb-02	240:20	25	9:37	14:28	24155:54	2203	10:58	-0.42	-1.26
Mar-02	260:50	23	11:39	14:12	23334:14	2217	10:32	0.42	-0.74
Apr-02	206:51	26	7:55	8:04	24097:57	2287	10:32	-0.93	-1.57
May-02	331:23	25	13:15	11:20	27276:46	2596	10:30	1.11	-0.32
Jun-02	266:49	24	10:52	11:06	30124:40	2553	11:48	-0.33	-1.2



Repair Repeat Report Rate (Percent) (MR-7A) (Parity)-- Dispatches Within MSAs

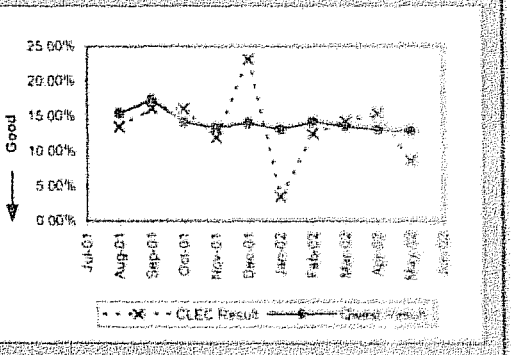
	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	12	85	14.12%	34.82%	621	3862	16.08%	-0.49	-1.3
Aug-01	12	83	14.46%	35.17%	640	4207	15.21%	-0.19	-1.12
Sep-01	9	66	13.64%	34.32%	569	3348	17.00%	-0.72	-1.44
Oct-01	11	61	18.03%	38.45%	456	3204	14.23%	0.84	-0.49
Nov-01	7	57	12.28%	32.82%	384	2757	13.93%	-0.36	-1.22
Dec-01	10	45	22.22%	41.57%	374	2655	14.09%	1.48	-0.1
Jan-02	2	31	6.45%	24.57%	327	2506	13.05%	-1.08	-1.66
Feb-02	3	26	11.54%	31.95%	317	2246	14.11%	-0.38	-1.23
Mar-02	3	24	12.50%	33.07%	317	2260	14.03%	-0.21	-1.13
Apr-02	4	26	15.38%	36.08%	308	2327	13.24%	0.36	-0.78
May-02	2	25	8.00%	27.13%	344	2639	13.04%	-0.74	-1.45
Jun-02	4	25	16.00%	36.66%	361	2613	13.82%	0.36	-0.78



Checklist #14 - Resale - Centrex 21 Repair

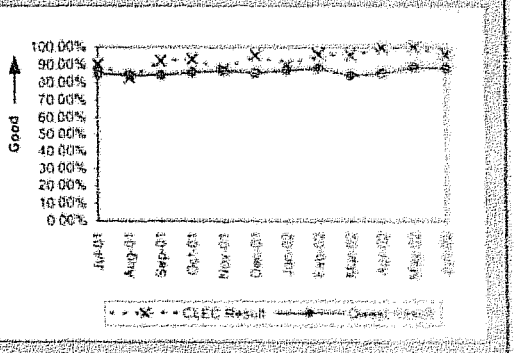
Repair Repeal Report Rate (Percent) (MR-7A*) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	10	74	13 51%	34 19%	551	3571	15.43%	-0 45	-1 27
Sep-01	9	56	16 07%	36 73%	498	2871	17.35%	-0 25	-1 15
Oct-01	9	56	16 07%	36 73%	386	2723	14 18%	0 43	-0 74
Nov-01	6	50	12 00%	32 50%	311	2325	13.38%	-0 28	-1 17
Dec-01	9	39	23 08%	42 13%	315	2247	14 02%	1 53	-0 07
Jan-02	1	28	3 57%	18 56%	282	2150	13 12%	-1 49	-1 9
Feb-02	3	24	12 50%	33 07%	266	1874	14 19%	-0 24	-1 14
Mar-02	3	21	14 29%	34 99%	266	1965	13 54%	0 16	-0 91
Apr-02	4	26	15 38%	36 06%	273	2079	13 13%	0 38	-0 77
May-02	2	23	8 70%	28 18%	302	2366	12 76%	-0 58	-1 35
Jun-02									



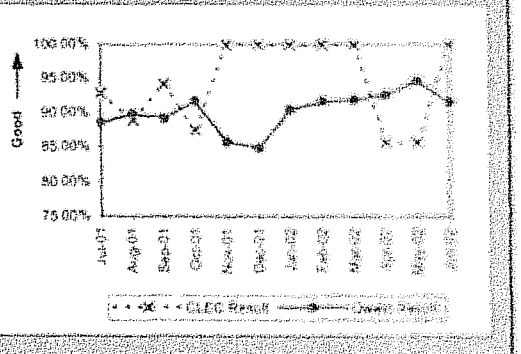
Repair Appointments Met (Percent) (MR-9A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	77	85	90 59%	29 20%	3294	3862	85.29%	-1 36	-1 83
Aug-01	69	83	83 13%	37 45%	3553	4207	84 45%	0 35	-0 78
Sep-01	61	66	92 42%	26 46%	2823	3348	84 32%	-1 79	-2 09
Oct-01	57	61	93 44%	24 75%	2753	3204	85 92%	-1 67	-2 02
Nov-01	50	57	87 72%	32 82%	2394	2757	86 83%	-0 2	-1 12
Dec-01	43	45	95 56%	20 61%	2273	2655	85 61%	-1 88	-2 15
Jan-02	28	31	90 32%	29 57%	2187	2506	87 27%	-0 51	-1 31
Feb-02	25	26	96 15%	19 23%	1980	2246	88 16%	-1 25	-1 76
Mar-02	23	24	95 83%	19 98%	1898	2260	83 98%	-1 57	-1 96
Apr-02	26	26	100 00%	0 00%	1990	2327	85 52%	-2 09	-2 27
May-02	25	25	100 00%	0 00%	2341	2639	88 71%	-1 78	-2 08
Jun-02	24	25	96 00%	19 60%	2302	2613	88 10%	-1 21	-1 74



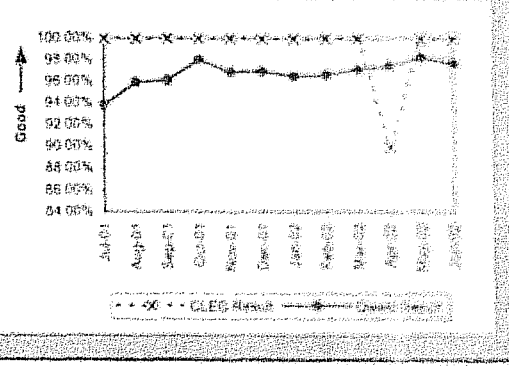
Out of Service Cleared within 24 hours (Percent) (MR-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	13	14	92 86%	25 75%	378	427	88 52%	-0 5	-1 3
Aug-01	8	9	88 89%	31 43%	369	411	89 78%	0 15	-0 91
Sep-01	16	17	94 12%	23 53%	287	322	89 13%	-0 64	-1 39
Oct-01	7	8	87 50%	33 07%	306	334	91 62%	0 43	-0 74
Nov-01	4	4	100 00%	0 00%	247	288	85 76%	-0 81	-1 49
Dec-01	9	9	100 00%	0 00%	218	257	84 82%	-1 25	-1 76
Jan-02	2	2	100 00%	0 00%	256	283	90 46%	-0 46	-1 28
Feb-02	5	5	100 00%	0 00%	199	216	91 67%	-0 67	-1 41
Mar-02	2	2	100 00%	0 00%	226	246	91 87%	-0 42	-1 25
Apr-02	6	7	85 71%	34 99%	227	245	92 65%	0 63	-0 61
May-02	6	7	85 71%	34 99%	262	298	94 63%	0 87	-0 47
Jun-02	8	8	100 00%	0 00%	252	275	91 64%	-0 84	-1 51



All Troubles Cleared within 48 hours (Percent) (MR-4B) (Parity)-- Dispatches Outside MSAs

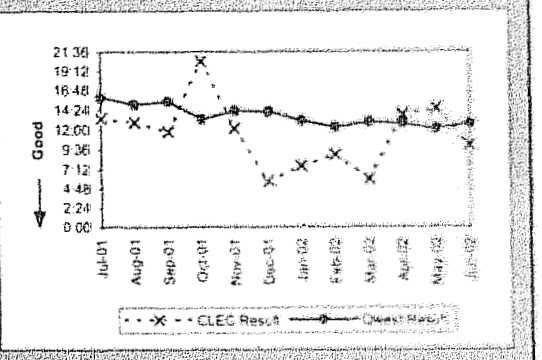
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	21	21	100 00%	0 00%	526	561	93 76%	-1 16	-1 71
Aug-01	15	15	100 00%	0 00%	540	563	95 91%	-0 79	-1 48
Sep-01	22	22	100 00%	0 00%	441	459	96 08%	-0 93	-1 56
Oct-01	9	9	100 00%	0 00%	442	451	98 00%	-0 42	-1 26
Nov-01	11	11	100 00%	0 00%	402	415	96 87%	-0 59	-1 36
Dec-01	10	10	100 00%	0 00%	348	359	96 94%	-0 55	-1 34
Jan-02	3	3	100 00%	0 00%	386	400	96 50%	-0 33	-1 2
Feb-02	6	6	100 00%	0 00%	313	324	96 60%	-0 46	-1 28
Mar-02	6	6	100 00%	0 00%	337	347	97 12%	-0 42	-1 25
Apr-02	9	10	90 00%	30 00%	349	358	97 49%	1 11	-0 32
May-02	10	10	100 00%	0 00%	391	398	98 24%	-0 42	-1 25
Jun-02	12	12	100 00%	0 00%	381	390	97 69%	-0 52	-1 32



Checklist #14 - Resale - Centrex 21 Repair

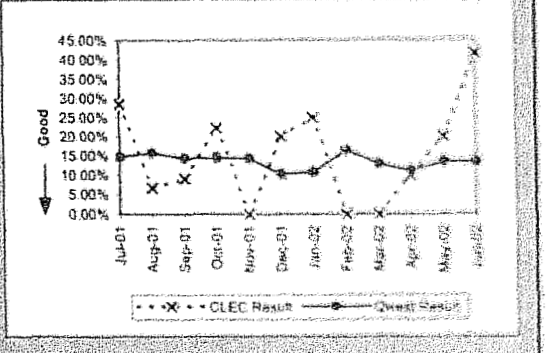
Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	281:15	21	13:24	11:36	8964:48	561	15:59	-0.65	-1.4
Aug-01	193:41	15	12:55	12:40	8465:05	563	15:02	-0.42	-1.26
Sep-01	259:27	22	11:48	8:47	7078:10	459	15:25	-0.93	-1.57
Oct-01	183:43	9	20:25	15:39	5989:56	451	13:17	1.96	0.19
Nov-01	133:53	11	12:10	9:20	5931:53	415	14:18	-0.46	-1.28
Dec-01	97:17	10	5:44	6:34	5105:30	359	14:13	-1.95	-2.19
Jan-02	22:50	3	7:37	9:34	5247:27	400	13:07	-0.7	-1.42
Feb-02	54:12	6	9:02	9:27	3984:30	324	12:18	-0.55	-1.34
Mar-02	35:47	6	5:58	6:14	4469:18	347	12:53	-1.01	-1.61
Apr-02	137:53	10	13:47	22:07	4559:42	358	12:44	0.45	-0.72
May-02	144:56	10	14:30	9:15	4802:13	398	12:04	0.76	-0.54
Jun-02	120:47	12	10:04	7:55	4941:16	390	12:40	-0.65	-1.4



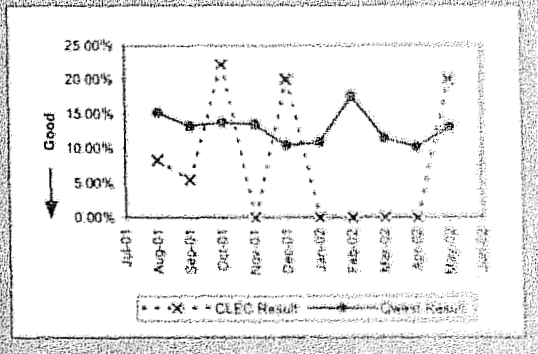
Repair Repeat Report Rate (Percent) (MR-7B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	6	21	28.57%	45.18%	84	571	14.71%	1.61	-0.02
Aug-01	1	15	6.67%	24.94%	90	572	15.73%	-0.95	-1.58
Sep-01	2	22	9.09%	28.75%	67	470	14.26%	-0.68	-1.41
Oct-01	2	9	22.22%	41.57%	66	458	14.41%	0.65	-0.6
Nov-01	0	11	0.00%	0.00%	60	421	14.25%	-1.33	-1.81
Dec-01	2	10	20.00%	40.00%	37	362	10.22%	0.93	-0.43
Jan-02	1	4	25.00%	43.30%	44	407	10.81%	0.78	-0.53
Feb-02	0	6	0.00%	0.00%	54	329	16.41%	-1.08	-1.65
Mar-02	0	6	0.00%	0.00%	45	350	12.86%	-0.93	-1.57
Apr-02	1	10	10.00%	30.00%	41	367	11.17%	-0.12	-1.07
May-02	2	10	20.00%	40.00%	54	403	13.40%	0.61	-0.63
Jun-02	5	12	41.67%	49.30%	53	395	13.42%	2.36	0.44



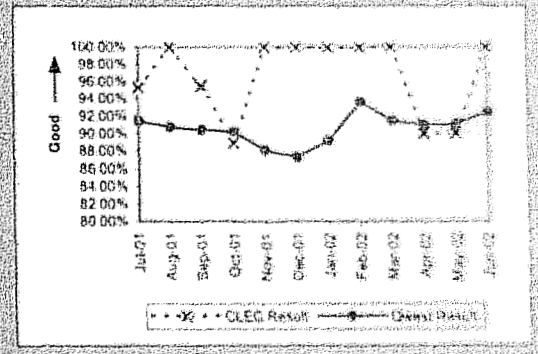
Repair Repeat Report Rate (Percent) (MR-7B*) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	1	12	8.33%	27.64%	71	468	15.17%	-0.65	-1.4
Sep-01	1	18	5.56%	22.91%	51	385	13.25%	-0.94	-1.57
Oct-01	2	9	22.22%	41.57%	49	357	13.73%	0.71	-0.57
Nov-01	0	6	0.00%	0.00%	47	348	13.51%	-0.96	-1.58
Dec-01	2	10	20.00%	40.00%	30	288	10.42%	0.9	-0.45
Jan-02	0	3	0.00%	0.00%	35	321	10.90%	-0.6	-1.37
Feb-02	0	3	0.00%	0.00%	46	262	17.56%	-0.79	-1.48
Mar-02	0	4	0.00%	0.00%	33	287	11.50%	-0.72	-1.44
Apr-02	0	7	0.00%	0.00%	32	312	10.26%	-0.88	-1.54
May-02	2	10	20.00%	40.00%	46	352	13.07%	0.63	-0.61
Jun-02									



Repair Appointments Met (Percent) (MR-9B) (Parity)-- Dispatches Outside MSAs

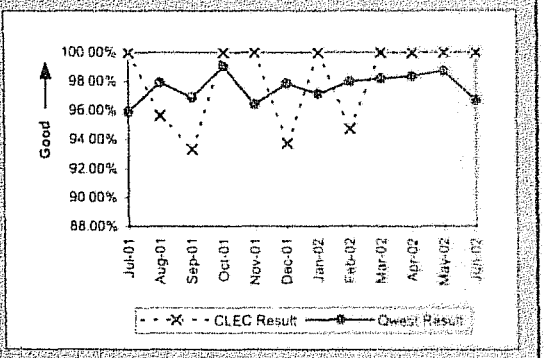
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	20	21	95.24%	21.30%	522	571	91.42%	-0.61	-1.37
Aug-01	15	15	100.00%	0.00%	519	572	90.73%	-1.22	-1.74
Sep-01	21	22	95.45%	20.83%	425	470	90.43%	-0.78	-1.48
Oct-01	8	9	88.89%	31.43%	413	458	90.17%	0.19	-0.89
Nov-01	11	11	100.00%	0.00%	371	421	88.12%	-1.2	-1.73
Dec-01	10	10	100.00%	0.00%	316	362	87.29%	-1.19	-1.72
Jan-02	4	4	100.00%	0.00%	363	407	89.19%	-0.69	-1.42
Feb-02	6	6	100.00%	0.00%	308	329	93.62%	-0.63	-1.39
Mar-02	6	6	100.00%	0.00%	320	350	91.43%	-0.74	-1.45
Apr-02	9	10	90.00%	30.00%	334	367	91.01%	0.17	-0.9
May-02	9	10	90.00%	30.00%	367	403	91.07%	0.17	-0.89
Jun-02	12	12	100.00%	0.00%	365	395	92.41%	-0.98	-1.59



Checklist #14 - Resale - Centrex 21 Repair

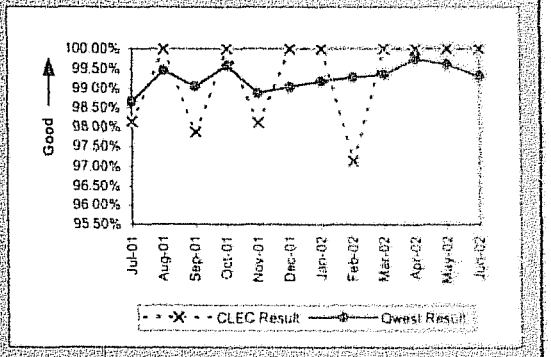
% of Service Orders within 24 hours (Percent) (MR-3C) (Parity)-- No Dispatches

[illegible]	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	22	22	100.00%	0.00%	942	982	95.93%	-0.96	-1.58
[illegible]	23	23	95.65%	20.39%	1086	1109	97.93%	0.7	-0.57
[illegible]	14	15	93.33%	24.94%	812	838	96.90%	0.72	-0.56
[illegible]	15	15	100.00%	0.00%	923	932	99.03%	-0.38	-1.23
[illegible]	13	13	100.00%	0.00%	727	754	96.42%	-0.69	-1.42
[illegible]	15	16	93.75%	24.21%	685	700	97.86%	0.93	-0.44
[illegible]	9	9	100.00%	0.00%	748	770	97.14%	-0.51	-1.31
[illegible]	18	19	94.74%	22.33%	726	741	97.98%	0.85	-0.48
[illegible]	10	10	100.00%	0.00%	757	771	98.18%	-0.43	-1.26
[illegible]	15	15	100.00%	0.00%	658	669	98.36%	-0.5	-1.3
[illegible]	11	11	100.00%	0.00%	690	699	98.71%	-0.38	-1.23
[illegible]	8	8	100.00%	0.00%	673	696	96.70%	-0.52	-1.32



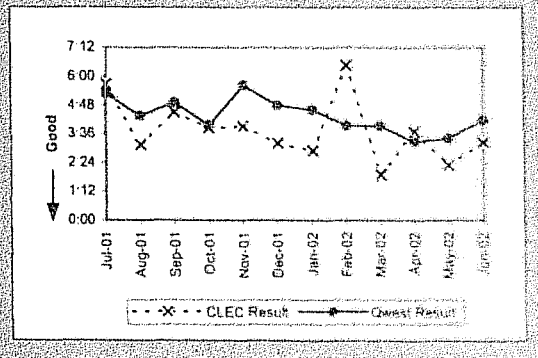
All Trouble Cleared within 48 hours (Percent) (MR-4C) (Parity)-- No Dispatches

[illegible]	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	53	54	98.15%	13.48%	1858	1883	98.67%	0.38	-0.77
[illegible]	52	52	100.00%	0.00%	2050	2061	99.47%	-0.52	-1.32
[illegible]	46	47	97.87%	14.43%	1573	1588	99.06%	0.75	-0.55
[illegible]	46	46	100.00%	0.00%	1886	1896	99.58%	-0.45	-1.27
[illegible]	52	53	98.11%	13.61%	1682	1701	98.88%	0.53	-0.68
[illegible]	36	36	100.00%	0.00%	1448	1462	99.04%	-0.58	-1.35
[illegible]	34	36	100.00%	0.00%	1722	1736	99.19%	-0.55	-1.33
[illegible]	34	35	97.14%	16.66%	1654	1666	99.28%	1.12	-0.32
[illegible]	36	36	100.00%	0.00%	1716	1727	99.36%	-0.48	-1.29
[illegible]	41	41	100.00%	0.00%	1546	1550	99.74%	-0.32	-1.2
[illegible]	39	39	100.00%	0.00%	1573	1579	99.62%	-0.38	-1.23
[illegible]	25	25	100.00%	0.00%	1469	1479	99.32%	-0.41	-1.25



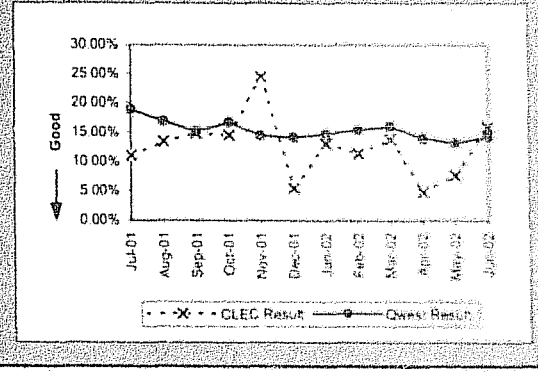
Mean Time to Restore (Hours:Minutes) (MR-6C) (Parity)-- No Dispatches

[illegible]	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	[illegible]:18	54	5:41	11:00	9953:18	1883	5:17	1.3	-0.21
[illegible]	[illegible]:50	52	3:09	4:42	8984:58	2061	4:22	-0.96	-1.58
[illegible]	[illegible]:59	47	4:31	9:06	7824:56	1588	4:56	-0.24	-1.14
[illegible]	[illegible]:48	46	3:52	5:56	7516:26	1896	3:58	-0.08	-1.05
[illegible]	[illegible]:51	53	3:55	8:38	9571:11	1701	5:38	-1.18	-1.72
[illegible]	[illegible]:18	36	3:14	4:57	7039:43	1462	4:49	-0.82	-1.5
[illegible]	[illegible]:32	36	2:55	4:46	8006:31	1736	4:37	-0.92	-1.56
[illegible]	[illegible]:08	35	6:28	13:29	6619:03	1666	3:58	1.48	-0.1
[illegible]	[illegible]:54	36	1:55	3:49	6812:52	1727	3:57	-1.3	-1.79
[illegible]	[illegible]:29	41	3:43	8:14	5097:09	1550	3:17	0.48	-0.71
[illegible]	[illegible]:30	39	2:19	4:24	5427:08	1579	3:26	-0.83	-1.5
[illegible]	[illegible]:36	25	3:16	6:02	6217:32	1479	4:12	-0.49	-1.3



Repair Repeat Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

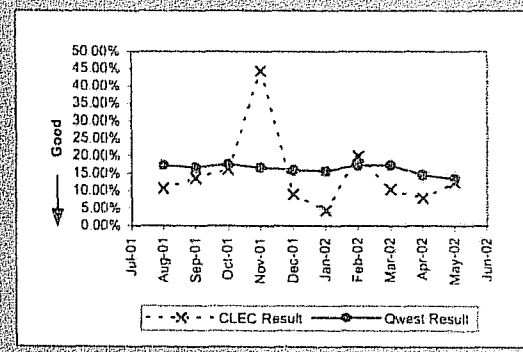
[illegible]	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	6	54	11.11%	31.43%	357	1883	18.96%	-1.45	-1.88
[illegible]	7	52	13.46%	34.13%	349	2061	16.93%	-0.66	-1.4
[illegible]	7	47	14.89%	35.60%	241	1588	15.18%	-0.05	-1.03
[illegible]	7	46	14.58%	35.29%	317	1896	16.72%	-0.39	-1.24
[illegible]	13	53	24.53%	43.03%	246	1701	14.46%	1.92	0.17
[illegible]	2	36	5.56%	22.91%	207	1462	14.16%	-1.46	-1.89
[illegible]	5	38	13.16%	33.80%	256	1736	14.75%	-0.27	-1.17
[illegible]	4	35	11.43%	31.82%	257	1666	15.43%	-0.65	-1.39
[illegible]	5	36	13.89%	34.58%	277	1727	16.04%	-0.35	-1.21
[illegible]	9	41	4.88%	21.54%	218	1550	14.06%	-1.67	-2.02
[illegible]	3	39	7.69%	26.65%	209	1579	13.24%	-1.01	-1.61
[illegible]	4	25	16.00%	36.66%	212	1482	14.31%	0.28	-0.83



Checklist #14 - Resale - Centrex 21 Repair

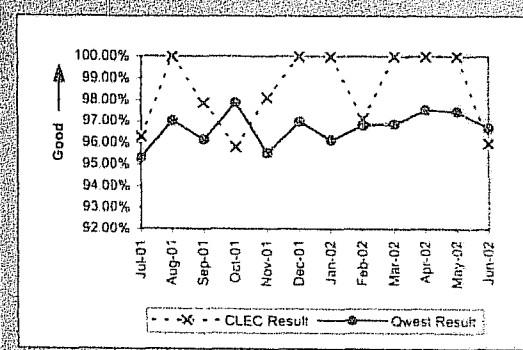
Trouble Rate (Percent) (MR-8) (Parity) - No Dispatches

					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Scr
					216	1259	17.32%	-0.91	-1.56
					148	886	16.67%	-0.38	-1.23
					182	1032	17.64%	-0.22	-1.14
					148	886	16.70%	3.31	1.01
					113	734	15.94%	-0.86	-1.53
					151	961	15.71%	-1.42	-1.87
					152	873	17.41%	0.3	-0.82
					162	932	17.38%	-0.78	-1.47
					116	798	14.54%	-0.91	-1.56
					116	861	13.47%	-0.14	-1.08



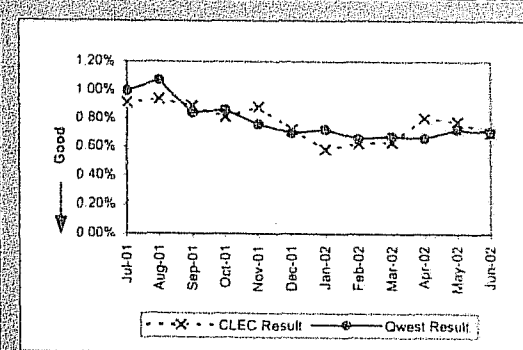
Trouble Rate (Percent) (MR-8) (Parity) - No Dispatches

					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Scr
					1765	1863	95.33%	-0.33	-1.2
					2000	2061	97.04%	-1.24	-1.76
					1527	1588	96.16%	-0.6	-1.37
					1656	1696	97.89%	0.92	-0.44
					1625	1701	95.53%	-0.9	-1.54
					1418	1462	96.99%	-1.04	-1.63
					1660	1736	96.14%	-1.22	-1.74
					1613	1666	96.82%	-0.11	-1.07
					1673	1727	96.87%	-1.07	-1.65
					1512	1550	97.55%	-1	-1.61
					1536	1579	97.47%	-0.99	-1.6
					1433	1482	96.69%	0.26	-0.84



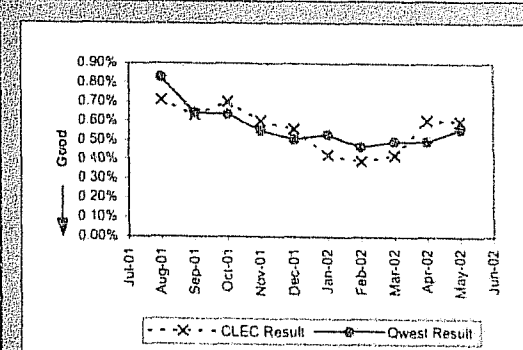
Trouble Rate (Percent) (MR-8) (Parity)

					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Scr
					6310	635843	0.99%	-1.04	-1.63
					6840	638818	1.07%	-1.62	-1.98
					5406	643127	0.84%	0.67	-0.59
					5558	645438	0.86%	-0.63	-1.38
					4879	644876	0.76%	1.65	0
					4479	644349	0.70%	0.34	-0.8
					4649	644124	0.72%	-1.8	-2.09
					4241	642615	0.66%	-0.42	-1.25
					4337	643795	0.67%	-0.49	-1.3
					4244	641766	0.66%	1.72	0.04
					4621	641029	0.72%	0.67	-0.59
					4490	640270	0.70%	-0.05	-1.03



Trouble Rate (Percent) (MR-8*) (Parity)

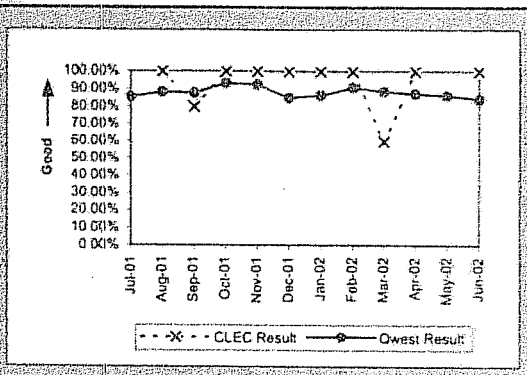
					Qwest Num	Qwest Den	Qwest Rate	Mod Z Scr	Parity Scr
					5298	638818	0.83%	-1.61	-1.98
					4144	643127	0.64%	-0.16	-1.1
					4112	645438	0.64%	0.98	-0.41
					3559	644876	0.55%	0.81	-0.51
					3269	644349	0.51%	0.86	-0.48
					3432	644124	0.53%	-1.65	-2.01
					3009	642615	0.47%	-1.13	-1.69
					3164	643795	0.49%	-1.04	-1.63
					3159	641766	0.50%	1.51	-0.08
					3579	641029	0.56%	0.55	-0.67



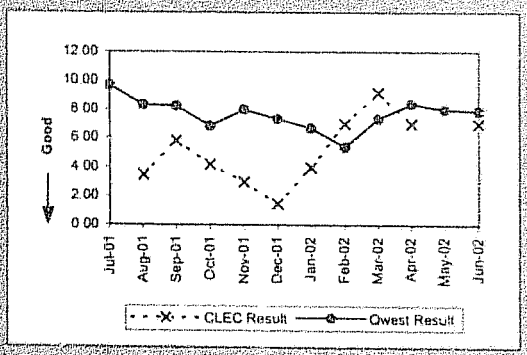
Checklist #14 - Resale - Centrex 21 Repair

CheckList #14 - Resale - PBX Installation

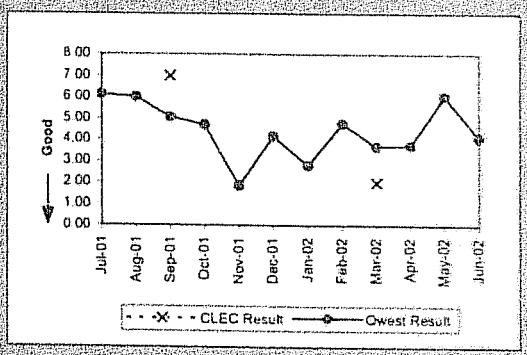
Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
151	158	95.64%		
162	169	95.86%	-0.51	-1.31
184	194	97.80%	0.49	-0.7
181	194	93.30%	-0.59	-1.36
161	174	92.55%	-0.4	-1.24
137	147	93.03%	-0.59	-1.36
161	171	94.15%	-0.39	-1.24
144	151	95.36%	-0.31	-1.19
113	118	95.76%	1.57	-0.05
126	136	92.65%	-0.53	-1.32
137	147	93.20%		
150	159	94.40%	-0.43	-1.25



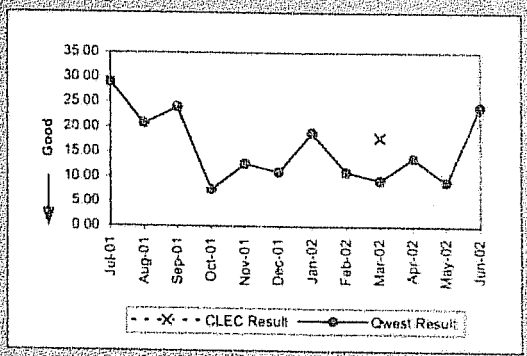
Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
1061	1135	9.70		
1021	1125	8.31	-0.47	-1.29
1093	1169	8.25	-0.42	-1.25
1148	1237	6.84	-0.57	-1.35
1121	1265	8.01	-0.56	-1.34
1100	1350	7.33	-0.78	-1.47
1113	1278	6.70	-0.3	-1.18
1021	1149	5.34	1.11	-0.33
1054	1135	7.36	0.66	-0.6
1154	1242	6.41	-0.18	-1.11
1232	1314	8.60		
1061	1120	7.92	-0.12	-1.07



Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
58	10	6.12		
72	12	6.00		
76	15	5.07	0.53	-0.68
47	10	4.70		
24	13	1.85		
75	18	4.17		
56	20	2.80		
64	15	4.27		
22	6	3.67	-0.75	-1.45
56	15	3.73		
109	18	6.06		
41	10	4.10		

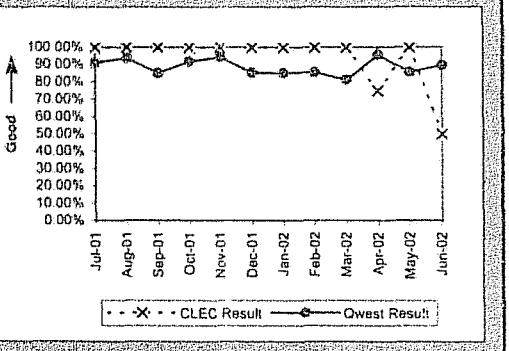


Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
421	14	30.07		
249	12	20.75		
144	6	24.00		
30	4	7.50		
38	3	12.67		
44	4	11.00		
95	5	19.00		
33	3	11.00		
84	9	9.33	0.96	-0.42
69	5	13.80		
45	5	9.00		
145	6	24.17		

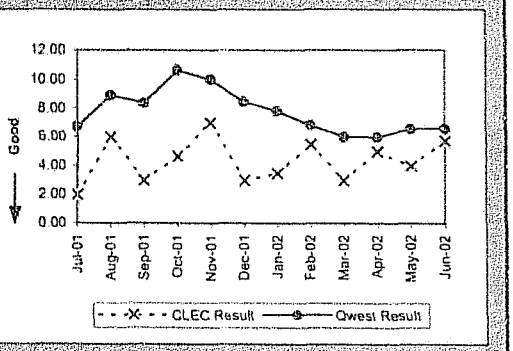


Checklist #14 - Resale - PBX Installation

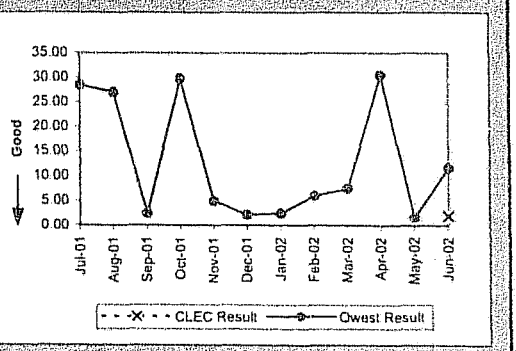
							Mod Z Scr	Parity Scr
				44	90.91%		-0.67	-1.41
				45	82.75%		-0.26	-1.16
				23	85.19%		-0.66	-1.52
				37	91.89%		-0.49	-1.3
				35	94.29%		-0.24	-1.15
				41	85.37%		-0.69	-1.42
				27	88.19%		-0.57	-1.35
				28	85.71%		-0.56	-1.34
				32	81.25%		-0.47	-1.29
				64	95.83%		1.09	-0.34
				42	85.71%		-0.4	-1.25
				38	89.47%		1.73	0.05



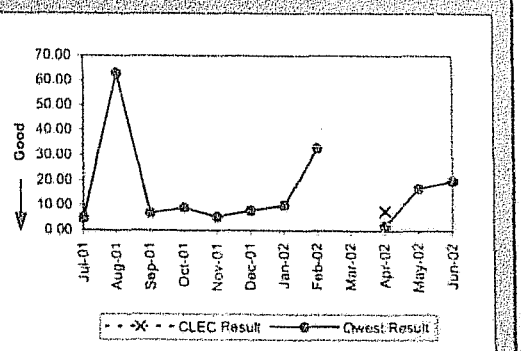
							Mod Z Scr	Parity Scr
				46	6.72		-0.76	-1.46
				50	8.94		-0.2	-1.12
				32	8.41		-0.91	-1.55
				43	10.67		-0.48	-1.29
				40	10.05		-0.2	-1.12
				42	8.50		-0.79	-1.48
				29	7.83		-0.57	-1.35
				35	6.86		-0.21	-1.13
				30	6.00		-0.65	-1.4
				26	6.00		-0.16	-1.1
				40	6.58		-0.26	-1.16
				41	6.83		-0.19	-1.12



							Mod Z Scr	Parity Scr
				114	4	28.50		
				61	5	27.00		
				5	2	2.50		
				149	5	29.80		
				25	5	5.00		
				11	5	2.20		
				5	2	2.50		
				18	3	6.00		
				45	6	7.50		
				61	2	30.50		
				5	3	1.67		
				35	3	11.67	-1.01	-1.61

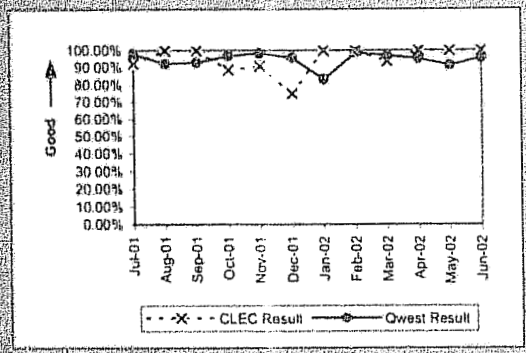


							Mod Z Scr	Parity Scr
				5	1	5.00		
				63	1	63.00		
				21	3	7.00		
				18	2	9.00		
				11	2	5.50		
				8	1	8.00		
				20	2	10.00		
				33	1	33.00		
				2	1	2.00		
				51	3	17.00		
				40	2	20.00		

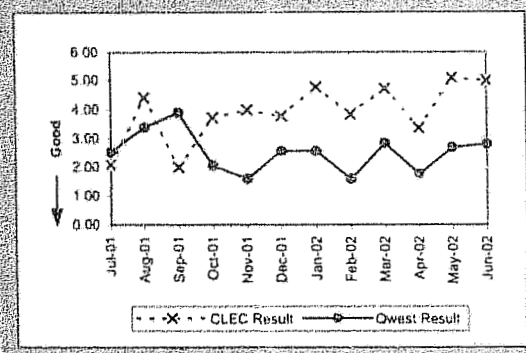


Checklist #14 - Resale - PBX Installation

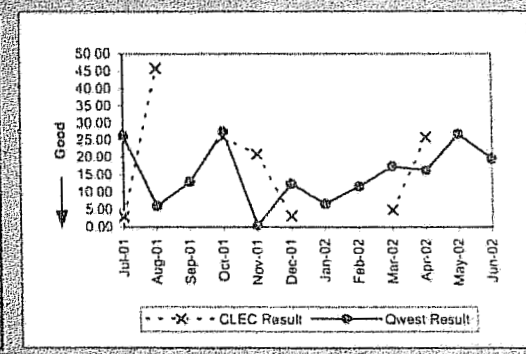
										Qwest Res	Mod Z Scr	Parity Scr
										98.23%	1.61	-0.02
										92.42%	-1.05	-1.64
										93.15%	-0.69	-1.42
										95.46%	1.2	-0.27
										96.39%	1.05	-0.36
										95.77%	2.85	0.73
										83.33%	-1.3	-1.79
										98.70%	-0.51	-1.31
										96.92%	0.51	-0.69
										93.24%	-0.73	-1.45
										91.25%	-1.11	-1.67
										95.56%	-0.83	-1.5



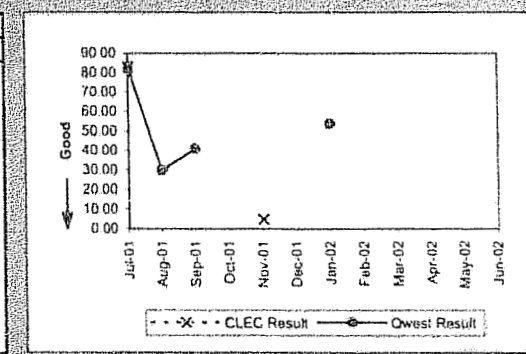
										Qwest Res	Mod Z Scr	Parity Scr
										2.53	-0.28	-1.17
										3.45	0.6	-0.63
										3.85	-0.4	-1.24
										3.05	0.97	-0.41
										1.59	1.04	-0.37
										2.57	0.51	-0.69
										2.64	0.74	-0.55
										1.56	3.72	1.26
										2.64	0.61	-0.63
										1.76	2.41	0.46
										2.69	1.4	-0.15
										2.81	1.67	0.02



										Qwest Res	Mod Z Scr	Parity Scr
										26.44	-0.56	-1.34
										6.00	3.72	1.26
										13.00		
										27.57	-0.05	-1.03
										0.50	3.72	1.26
										12.50	-1.21	-1.74
										6.67		
										11.67		
										17.50	-0.53	-1.32
										16.29	1.14	-0.31
										26.82		
										19.70		

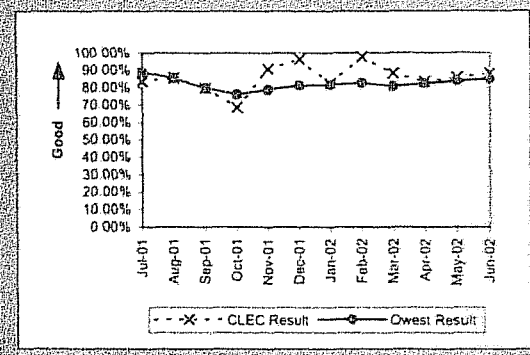


										Qwest Res	Mod Z Scr	Parity Scr
										83.00		
										30.00		
										41.00		
										64.00		

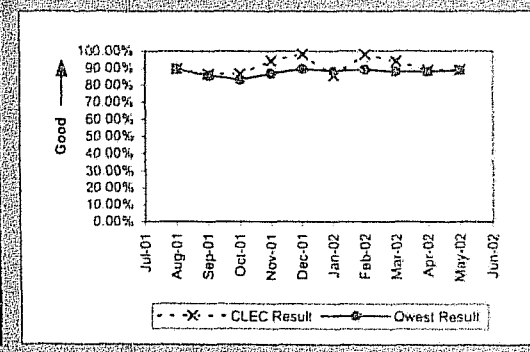


Checklist #14 - Resale - PBX Installation

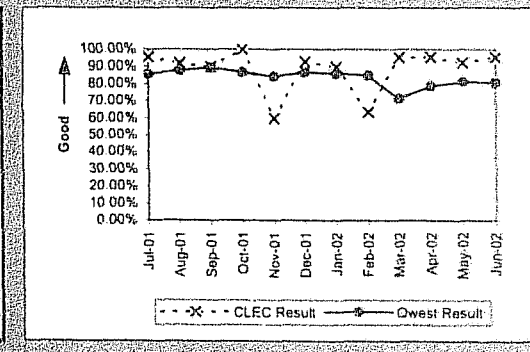
				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				1682	1836	89.16%	1.68	0.02
				1010	1179	85.67%	-0.05	-1.03
				658	823	79.71%	-0.06	-1.04
				624	818	76.28%	1.29	-0.22
				676	858	78.87%	-2.11	-2.26
				597	734	81.34%	-2.93	-2.78
				583	714	81.65%	-0.17	-1.11
				561	704	82.81%	-2.82	-2.71
				546	675	80.89%	-1.34	-1.81
				564	684	82.46%	-0.23	-1.13
				599	699	84.12%	-0.43	-1.26
				641	753	85.13%	-0.79	-1.48



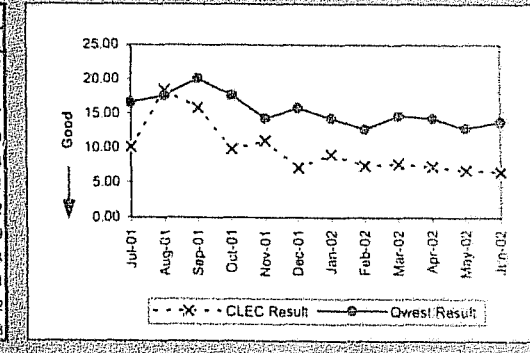
				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				1056	1179	89.57%	-0.1	-1.06
				705	823	85.66%	-0.24	-1.14
				682	818	83.37%	-0.71	-1.43
				744	858	86.92%	-1.63	-1.99
				659	734	89.78%	-2.1	-2.28
				630	714	88.24%	0.61	-0.63
				628	704	89.20%	-1.99	-2.21
				594	675	88.00%	-1.33	-1.81
				602	684	88.01%	-0.24	-1.14
				621	699	88.84%	-0.1	-1.06



				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				144	168	85.71%	-1.28	-1.78
				123	140	87.86%	-0.58	-1.36
				85	95	89.47%	-0.05	-1.03
				118	136	86.76%	-1.25	-1.76
				102	121	84.30%	1.24	-0.25
				72	83	86.75%	-0.62	-1.38
				110	128	85.94%	-0.49	-1.3
				108	127	85.04%	1.65	0
				105	147	71.43%	-2.33	-2.41
				105	133	78.95%	-1.81	-2.1
				123	151	81.46%	-1.31	-1.8
				118	146	80.82%	-1.68	-2.02



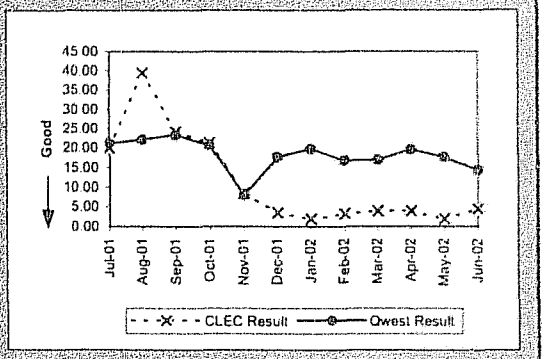
				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				6742	406	16.61	-1.76	-2.07
				5648	320	17.65	0.92	-0.44
				4263	213	20.11	-0.78	-1.47
				5379	304	17.69	-1.63	-1.99
				3705	258	14.36	-0.49	-1.3
				3239	204	15.88	-2.32	-2.41
				3240	226	14.34	-1.52	-1.92
				2647	207	12.79	-1.14	-1.69
				3470	236	14.70	-2.04	-2.24
				3312	231	14.34	-1.88	-2.14
				2996	232	12.91	-1.83	-2.12
				3352	242	13.85	-2.44	-2.48



Checklist #14 - Resale - PBX Installation

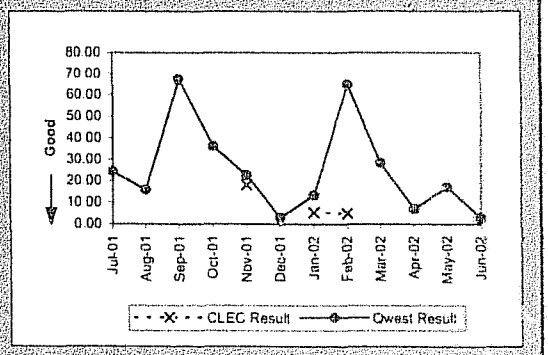
Provide Loops for Facility Readiness (Average Days) (OP-6A-4) (Parity) -- Interval Zone One

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
			10.41	9.55	3062	145	21.26	-0.14	-1.09
			33.50	33.35	2669	120	22.17	1.57	-0.04
			34.25	11.34	2245	98	23.39	1.09	-0.33
			21.38	20.53	2382	115	20.71	1.08	-0.34
			8.43	13.73	1457	180	8.09	1.01	-0.39
			3.50	3.54	1361	77	17.68	-1.21	-1.73
			2.00	1.41	1229	62	19.82	-0.71	-1.43
			3.33	3.21	706	42	16.81	-0.97	-1.59
			2.25	1.41	1141	67	17.03	-0.92	-1.56
			4.00	4.24	1215	62	19.60	-1.39	-1.85
			3.50	0.00	923	52	17.75	-1.23	-1.74
			4.95	4.95	904	63	14.35	-0.78	-1.47



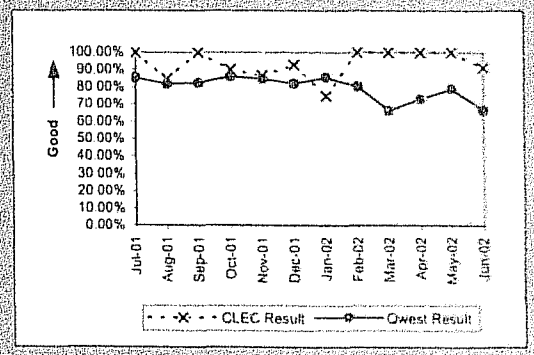
Provide Loops for Facility Readiness (Average Days) (OP-6B-4) (Parity) -- Interval Zone One

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					268	11	24.36		
					142	9	15.78		
					135	2	67.50		
					291	8	36.38		
			15.00		158	7	22.57	-0.11	-1.07
					3	1	3.00		
			6.50	3.54	40	3	13.33	-0.72	-1.44
			5.00		65	1	65.00		
					114	4	28.50		
					7	1	7.00		
					68	4	17.00		
					3	1	3.00		



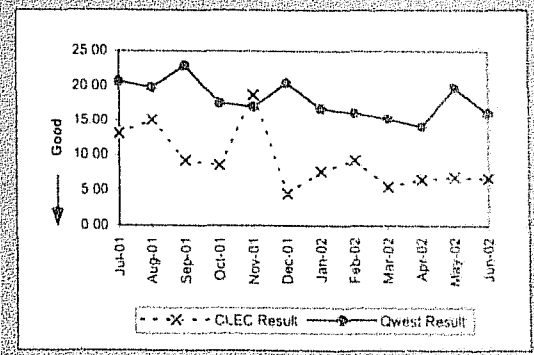
Provide Timely Commitments Met (Percent) (OP-3E) (Parity) -- Interval Zone Two

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
			100.00%	0.00%	53	62	85.48%	-1.31	-1.79
			85.00%	35.71%	68	83	81.93%	-0.32	-1.19
			100.00%	0.00%	66	80	82.50%	-1.17	-1.71
			70.00%	30.00%	106	123	86.18%	-0.34	-1.2
			86.67%	53.99%	100	118	84.75%	-0.19	-1.12
			82.86%	25.75%	55	67	82.09%	-0.96	-1.58
			75.00%	43.30%	82	96	85.42%	0.89	-0.46
			100.00%	0.00%	78	97	80.41%	-1.26	-1.77
			100.00%	0.00%	77	116	66.38%	-1.22	-1.74
			100.00%	0.00%	68	93	73.12%	-1.74	-2.06
			100.00%	0.00%	79	109	79.00%	-2.44	-2.49
			61.30%	28.18%	108	162	66.67%	-2.35	-2.43



Provide Timely Interval (Average Days) (OP-4E) (Parity) -- Interval Zone Two

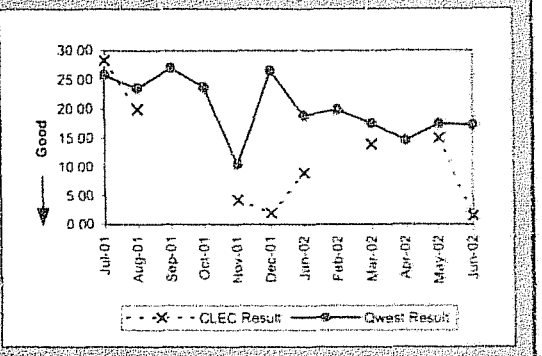
					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
			13.10	13.91	4141	209	20.70	-1.51	-1.92
			15.05	11.54	4244	215	19.74	-0.99	-1.6
			9.25	4.27	3828	167	22.92	-2.03	-2.23
			5.68	5.24	4037	230	17.55	-1.4	-1.85
			18.75	32.59	3633	214	16.98	0.79	-0.52
			4.50	2.47	3618	177	20.44	-1.69	-2.03
			7.66	4.33	3015	228	16.73	-1.86	-2.13
			9.25	6.56	2607	175	16.04	-0.87	-1.53
			5.50	1.26	2873	189	15.20	-1.08	-1.66
			6.50	1.64	2476	176	14.07	-1.46	-1.89
			6.65	6.81	3649	185	19.72	-2.89	-2.76
			6.75	2.11	4237	262	16.06	-2.64	-2.6



Checklist #14 - Resale - PBX Installation

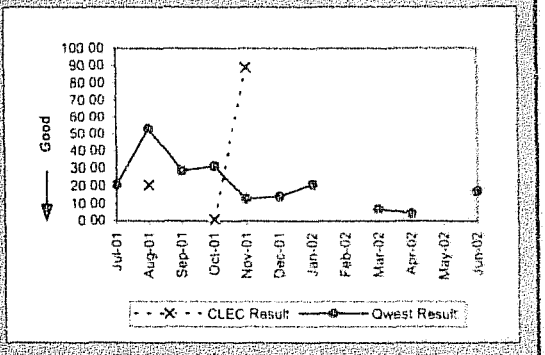
Average Days to Process Firm Order Confirmations (Average Days) (OP-6A-5) (Parity) – Interval Zone Two

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					2349	91	25 81	1.2	-0.27
					2251	96	23 55	-0.3	-1 18
					1841	68	27 07		
					1737	73	23 79		
					1278	122	10 48	-0 89	-1 54
					1463	55	26 60	-0 46	-1 28
					1436	76	18 89	-0 99	-1 6
					1117	56	19 95		
					1264	72	17 56	-0 16	-1 1
					791	54	14 65		
					1277	73	17 49	-0 18	-1 11
					1383	80	17 29	-1 13	-1 69



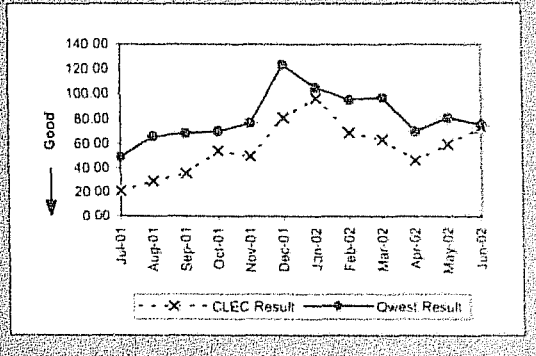
Average Days for Firm Reasons (Average Days) (OP-6B-5) (Parity) – Interval Zone Two

					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					21	1	21 00		
					427	8	53 38	-1 17	-1 71
					258	9	28 67		
					281	9	31 22	-0 94	-1 57
					102	8	12 75	3 72	1 26
					71	5	14 20		
					105	5	21 00		
					7	1	7 00		
					9	2	4 50		
					34	2	17 00		



Average Days to Process Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

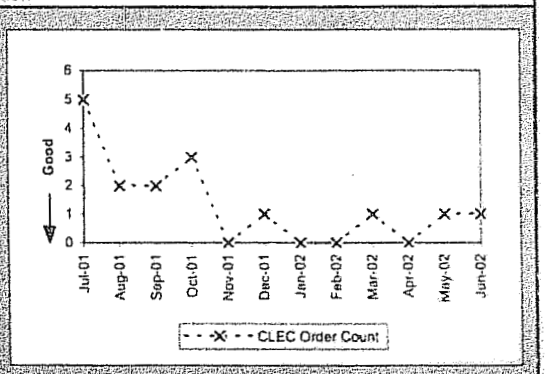
					Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
					11179	228	49 03	-1 18	-1.72
					11600	175	66 29	-1 33	-1 81
					11606	169	68 67	-1 11	-1 68
					11305	161	70 22	-0 47	-1 28
					14244	185	76 99	-0 6	-1 37
					12592	102	123 45	-0 79	-1 48
					13790	131	105 27	-0 17	-1 1
					12799	134	95 51	-0 35	-1 21
					13714	141	97 26	-0 5	-1 3
					15099	215	70 23	-0 55	-1 34
					14763	182	81 12	-0 44	-1 27
					16185	214	75 63	-0 04	-1.02



Checklist #14 - Resale - PBX Installation

Percent Pending Orders Delayed for Facilities Reasons PBX (OP-15B) (Diagnostic)

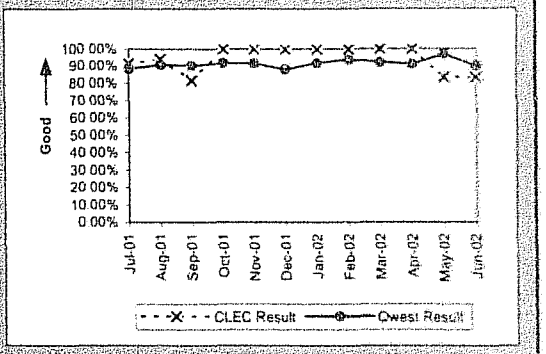
	CLEC Order Count
	5
	2
	2
	3
	0
	1
	0
	0
	1
	0
	1
	1



Checklist #14 - Resale - PBX Repair

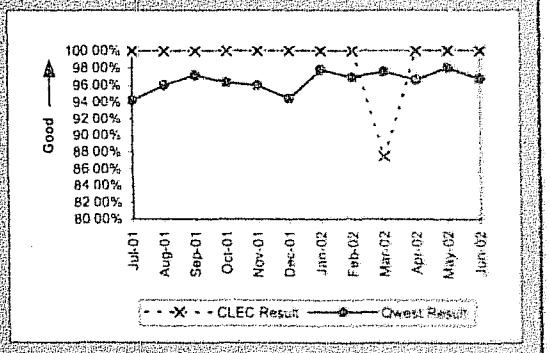
Out of Service Cleared within 24 hours (Percent) (MR-3A) (Parity)-- Dispatches Within MSAs

	13	13	91.67%	27.64%	499	564	88.48%	-0.34	-1.21
	12	12	94.12%	23.53%	529	583	90.74%	-0.47	-1.29
	11	11	81.82%	38.57%	394	437	90.16%	0.86	-0.48
	14	14	100.00%	0.00%	416	453	91.83%	-1.1	-1.67
	7	7	100.00%	0.00%	327	357	91.60%	-0.79	-1.48
	4	4	100.00%	0.00%	305	347	87.90%	-0.74	-1.45
	9	9	100.00%	0.00%	395	430	91.86%	-0.88	-1.54
	3	3	100.00%	0.00%	299	319	93.73%	-0.45	-1.27
	7	7	100.00%	0.00%	306	332	92.17%	-0.76	-1.46
	4	4	100.00%	0.00%	314	345	91.01%	-0.62	-1.38
	6	6	83.33%	37.27%	331	342	96.78%	1.28	-0.22
	6	6	83.33%	37.27%	316	351	90.03%	0.53	-0.68



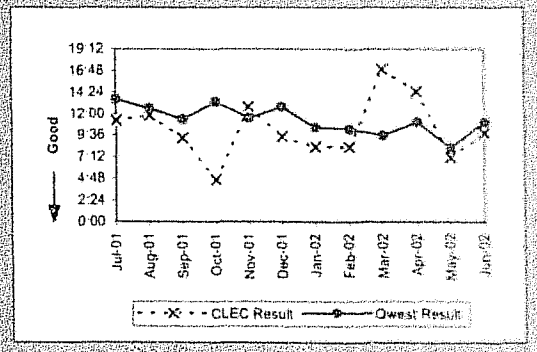
All Trouble Cleared within 48 hours (Percent) (MR-4A) (Parity)-- Dispatches Within MSAs

	13	13	100.00%	0.00%	603	640	94.22%	-0.88	-1.54
	14	14	100.00%	0.00%	651	678	96.02%	-0.88	-1.53
	17	17	100.00%	0.00%	484	498	97.19%	-0.69	-1.42
	15	15	100.00%	0.00%	529	549	96.36%	-0.74	-1.45
	13	13	100.00%	0.00%	407	424	95.99%	-0.64	-1.39
	6	6	100.00%	0.00%	390	413	94.43%	-0.59	-1.36
	9	9	100.00%	0.00%	489	500	97.80%	-0.45	-1.27
	4	4	100.00%	0.00%	345	357	96.92%	-0.35	-1.22
	3	3	66.67%	33.07%	366	375	97.60%	1.28	-0.22
	6	6	100.00%	0.00%	401	415	96.63%	-0.45	-1.28
	8	8	100.00%	0.00%	387	395	97.97%	-0.35	-1.21
	7	7	100.00%	0.00%	389	402	96.77%	-0.48	-1.29



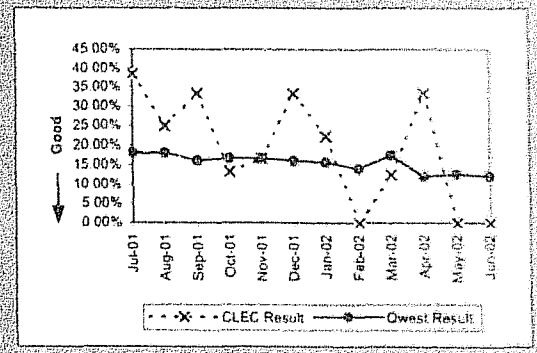
Mean Time to Restore (Hours Minutes) (MR-6A) (Parity)-- Dispatches Within MSAs

	13	13	11:16	8:15	8732:00	640	13:39	-0.42	-1.25
	19	19	11:50	10:32	8541:14	678	12:36	-0:18	-1:11
	17	17	9:18	8:53	5677:44	498	11:24	-0:47	-1:29
	15	15	4:40	6:48	7319:44	549	13:20	-0:74	-1:45
	10	10	12:49	14:55	4887:49	424	11:32	1:94	0:18
	6	6	9:26	9:14	5291:42	413	12:49	-0:45	-1:27
	9	9	8:20	7:54	5243:14	500	10:29	-0:45	-1:27
	4	4	8:15	9:12	3678:14	357	10:18	-0:27	-1:17
	8	8	17:00	21:29	3580:25	375	9:33	1:33	-0:19
	6	6	14:31	8:33	4600:40	415	11:05	0:64	-0:61
	6	6	7:12	8:33	3241:59	395	8:12	-0:2	-1:12
	7	7	9:52	11:53	4445:28	402	11:04	-0:22	-1:13



Repair Repeat Report Rate (Percent) (MR-7A) (Parity)-- Dispatches Within MSAs

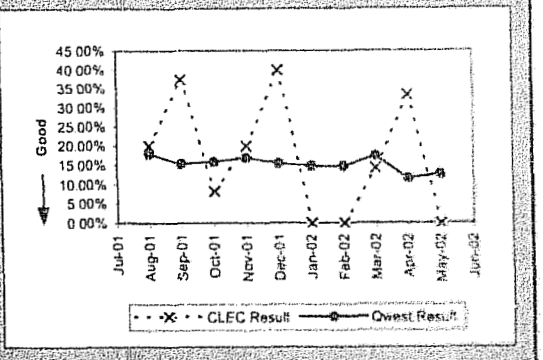
	13	13	38.46%	48.65%	119	658	18.09%	1.71	0.04
	20	20	25.00%	43.30%	127	700	18.14%	0.78	-0.53
	16	16	33.33%	47.14%	82	508	16.14%	1.77	0.07
	15	15	13.33%	33.99%	93	558	16.67%	-0.34	-1.21
	12	12	16.67%	37.27%	73	437	16.70%	0	-1
	6	6	33.33%	47.14%	68	423	16.08%	1.02	-0.38
	9	9	22.22%	41.57%	81	515	15.73%	0.54	-0.67
	4	4	0.00%	0.00%	51	363	14.05%	-0.8	-1.49
	8	8	12.50%	33.07%	67	383	17.49%	-0.37	-1.22
	6	6	33.33%	47.14%	51	424	12.03%	1.34	-0.19
	8	8	0.00%	0.00%	51	402	12.69%	-0.93	-1.56
	7	7	0.00%	0.00%	50	409	12.22%	-0.98	-1.6



Checklist #14 - Resale - PBX Repair

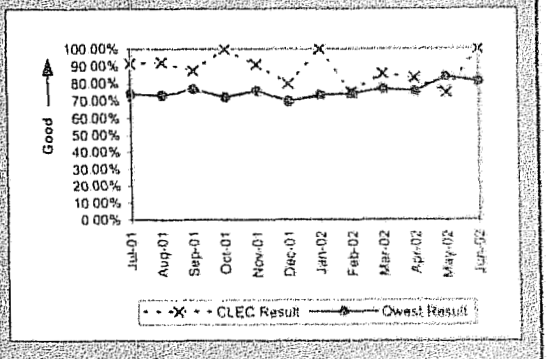
Repair Repeat Report Rate (Percent) (MR-7A*) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]									
Jul-01	3	15	20.00%	40.00%	101	562	17.97%	0.24	-0.85
Aug-01	6	16	37.50%	48.41%	61	399	15.29%	2.12	0.29
Sep-01	1	12	8.33%	27.64%	68	429	15.85%	-0.7	-1.43
Oct-01	2	10	20.00%	40.00%	58	343	16.91%	0.29	-0.82
Nov-01	2	5	40.00%	48.99%	49	317	15.46%	1.28	-0.22
Dec-01	0	6	0.00%	0.00%	61	416	14.66%	-1.01	-1.61
Jan-02	0	3	0.00%	0.00%	43	295	14.58%	-0.71	-1.43
Feb-02	1	7	14.29%	34.99%	53	305	17.38%	-0.21	-1.13
Mar-02	2	6	33.33%	47.14%	46	346	11.56%	1.38	-0.16
Apr-02	0	5	0.00%	0.00%	42	331	12.69%	-0.85	-1.51
May-02									



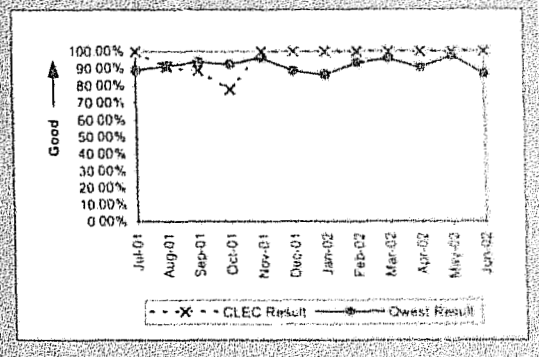
Repair Appointments Met (Percent) (MR-9A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	11	12	91.67%	27.64%	330	446	73.99%	-1.38	-1.84
Aug-01	12	13	92.31%	26.65%	333	455	73.19%	-1.53	-1.93
Sep-01	14	16	87.50%	33.07%	239	311	76.85%	-0.99	-1.6
Oct-01	6	6	100.00%	0.00%	267	370	72.16%	-1.51	-1.92
Nov-01	10	11	90.91%	28.75%	214	282	75.89%	-1.14	-1.69
Dec-01	4	5	80.00%	40.00%	209	299	69.90%	-0.49	-1.3
Jan-02	8	8	100.00%	0.00%	243	331	73.41%	-1.68	-2.02
Feb-02	3	4	75.00%	43.30%	177	239	74.06%	-0.04	-1.03
Mar-02	6	7	85.71%	34.99%	189	246	76.83%	-0.55	-1.33
Apr-02	5	6	83.33%	37.27%	206	273	75.46%	-0.44	-1.27
May-02	3	4	75.00%	43.30%	209	249	83.94%	0.46	-0.72
Jun-02	4	4	100.00%	0.00%	217	268	80.97%	-0.96	-1.59



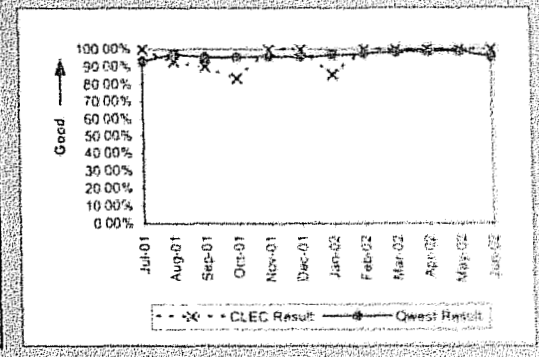
Out of Service Cleared within 24 hours (Percent) (MR-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	8	8	100.00%	0.00%	113	127	88.98%	-0.97	-1.59
Aug-01	10	11	90.91%	28.75%	105	115	91.30%	0.07	-0.96
Sep-01	8	9	88.89%	31.43%	105	112	93.75%	0.52	-0.68
Oct-01	7	9	77.78%	41.57%	122	132	92.42%	1.31	-0.2
Nov-01	5	5	100.00%	0.00%	79	82	96.34%	-0.42	-1.26
Dec-01	4	4	100.00%	0.00%	85	96	88.54%	-0.7	-1.43
Jan-02	3	3	100.00%	0.00%	82	95	86.32%	-0.68	-1.41
Feb-02	1	1	100.00%	0.00%	83	89	93.26%	-0.27	-1.16
Mar-02	3	3	100.00%	0.00%	85	89	95.51%	-0.37	-1.22
Apr-02	11	11	100.00%	0.00%	58	64	90.63%	-0.99	-1.6
May-02	11	11	100.00%	0.00%	71	73	97.26%	-0.52	-1.32
Jun-02	7	7	100.00%	0.00%	78	90	86.67%	-1	-1.61



All Troubles Cleared within 48 hours (Percent) (MR-4B) (Parity)-- Dispatches Outside MSAs

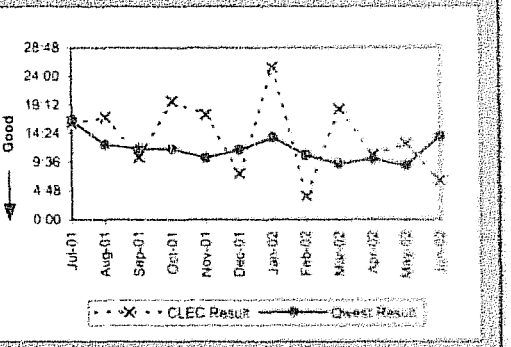
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	10	10	100.00%	0.00%	144	155	92.90%	-0.85	-1.52
Aug-01	13	14	92.86%	25.75%	143	147	97.28%	0.78	-0.53
Sep-01	9	10	90.00%	30.00%	123	129	95.35%	0.66	-0.6
Oct-01	10	12	83.33%	37.27%	142	149	95.30%	1.45	-0.12
Nov-01	6	6	100.00%	0.00%	96	100	96.00%	-0.49	-1.3
Dec-01	6	6	100.00%	0.00%	108	113	95.58%	-0.51	-1.31
Jan-02	6	7	85.71%	34.99%	114	118	96.61%	1.1	-0.33
Feb-02	2	2	100.00%	0.00%	114	117	97.44%	-0.23	-1.14
Mar-02	4	4	100.00%	0.00%	113	115	98.26%	-0.26	-1.16
Apr-02	14	14	100.00%	0.00%	83	84	98.81%	-0.38	-1.23
May-02	15	15	100.00%	0.00%	93	94	98.94%	-0.37	-1.23
Jun-02	8	8	100.00%	0.00%	110	115	95.65%	-0.58	-1.35



Checklist #14 - Resale - PBX Repair

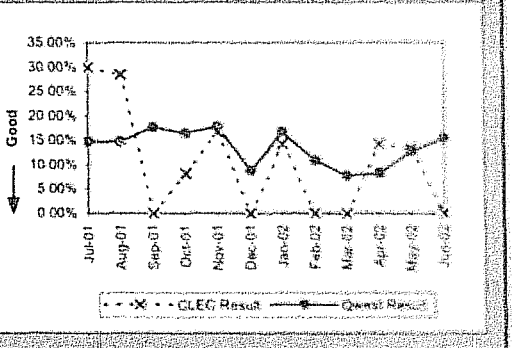
Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	161:23	10	16:09	9:03	2584:17	155	16:40	-0.08	-1.05
Aug-01	240:12	14	17:10	17:50	1845:11	147	12:34	1.34	-0.18
Sep-01	184:49	10	18:29	17:40	1531:39	129	11:52	-0.26	-1.16
Oct-01	238:31	12	19:53	24:05	1760:45	149	11:49	1.48	-0.1
Nov-01	103:49	6	17:38	5:47	1029:52	100	10:18	1.55	-0.06
Dec-01	46:34	6	7:46	7:54	1315:38	113	11:39	-0.6	-1.37
Jan-02	178:24	7	25:30	23:53	1623:06	118	13:45	1.7	0.03
Feb-02	8:00	2	4:00	2:03	1261:20	117	10:47	-0.88	-1.42
Mar-02	74:08	4	18:32	19:16	1074:26	115	9:21	1.34	-0.18
Apr-02	152:38	14	10:46	8:46	849:09	84	10:07	0.23	-0.66
May-02	191:35	15	12:46	8:20	851:08	94	9:03	1.15	-0.3
Jun-02	51:46	8	6:29	7:11	1599:59	115	13:55	-1.26	-1.77



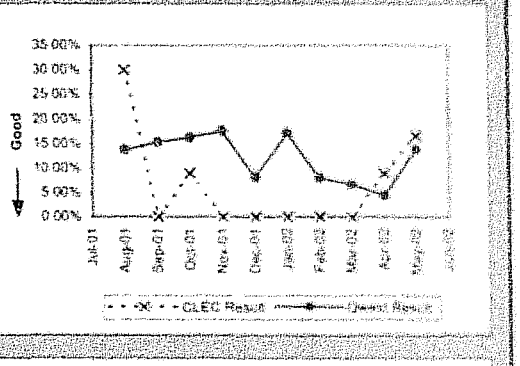
Repair Repeat Report Rate (Percent) (MR-7B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	3	10	30.00%	45.83%	23	156	14.74%	1.19	-0.28
Aug-01	4	14	28.57%	45.18%	22	149	14.77%	1.26	-0.23
Sep-01	0	10	0.00%	0.00%	23	130	17.69%	-1.41	-1.86
Oct-01	1	12	8.33%	27.64%	25	152	16.45%	-0.73	-1.44
Nov-01	1	6	16.67%	37.27%	18	101	17.82%	-0.07	-1.04
Dec-01	0	6	0.00%	0.00%	10	113	8.85%	-0.74	-1.45
Jan-02	1	7	14.29%	34.99%	20	120	16.67%	-0.16	-1.1
Feb-02	0	3	0.00%	0.00%	13	119	10.92%	-0.6	-1.36
Mar-02	0	4	0.00%	0.00%	9	115	7.83%	-0.57	-1.35
Apr-02	2	14	14.29%	34.99%	7	84	8.33%	0.68	-0.59
May-02	2	15	13.33%	33.99%	12	94	12.77%	0.09	-0.95
Jun-02	0	8	0.00%	0.00%	18	117	15.38%	-1.17	-1.71



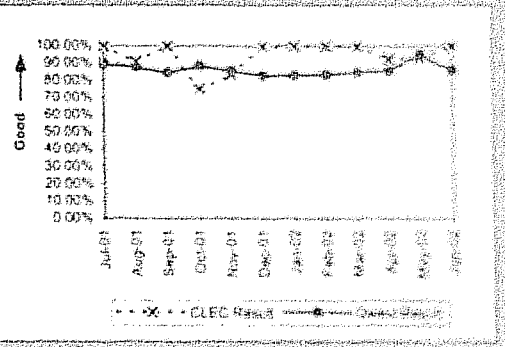
Repair Repeat Report Rate (Percent) (MR-7B*) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	3	10	30.00%	45.83%	15	109	13.76%	1.26	-0.24
Sep-01	0	6	0.00%	0.00%	16	104	15.38%	-1.23	-1.75
Oct-01	1	11	9.09%	28.75%	20	122	16.39%	-0.63	-1.38
Nov-01	0	5	0.00%	0.00%	12	68	17.65%	-1	-1.61
Dec-01	0	2	0.00%	0.00%	7	85	8.24%	-0.42	-1.25
Jan-02	0	5	0.00%	0.00%	16	93	17.20%	-0.99	-1.6
Feb-02	0	2	0.00%	0.00%	7	87	8.05%	-0.41	-1.25
Mar-02	0	2	0.00%	0.00%	5	89	5.74%	-0.38	-1.23
Apr-02	1	11	9.09%	28.75%	3	67	4.48%	0.56	-0.66
May-02	2	12	16.67%	37.27%	11	79	13.92%	0.27	-0.84
Jun-02									



Repair Appointments Met (Percent) (MR-9B) (Parity)-- Dispatches Outside MSAs

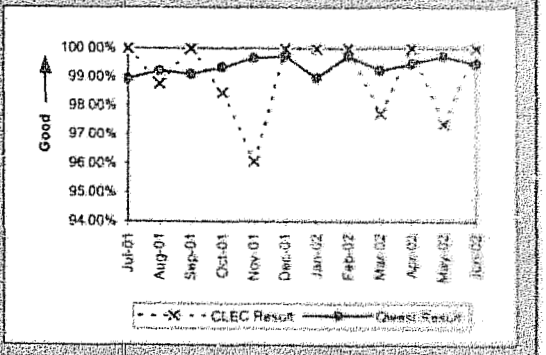
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	9	9	100.00%	0.00%	93	104	89.42%	-0.99	-1.6
Aug-01	10	11	90.91%	28.75%	92	105	87.62%	-0.32	-1.19
Sep-01	6	6	100.00%	0.00%	76	90	84.44%	-1.02	-1.62
Oct-01	9	12	75.00%	43.30%	91	103	88.35%	1.2	-0.27
Nov-01	5	6	83.33%	37.27%	59	69	85.51%	0.15	-0.91
Dec-01	6	6	100.00%	0.00%	67	81	82.72%	-1.08	-1.66
Jan-02	7	7	100.00%	0.00%	77	93	82.80%	-1.16	-1.71
Feb-02	3	3	100.00%	0.00%	70	84	83.33%	-0.76	-1.45
Mar-02	4	4	100.00%	0.00%	67	79	84.81%	-0.83	-1.5
Apr-02	12	13	92.31%	26.65%	48	56	85.71%	-0.61	-1.37
May-02	14	15	93.33%	24.94%	63	66	95.45%	0.31	-0.81
Jun-02	5	5	100.00%	0.00%	75	87	86.21%	-0.87	-1.53



Checklist #14 - Resale - PBX Repair

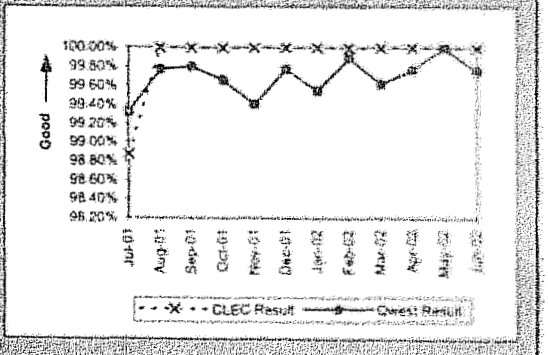
Out of Service Cleared within 24 hours (Percent) (MR-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	72	72	100.00%	0.00%	1024	1035	98.94%	-0.85	-1.52
Aug-01	61	62	98.78%	10.98%	1155	1164	99.23%	0.45	-0.73
Sep-01	63	63	100.00%	0.00%	886	894	99.11%	-0.73	-1.44
Oct-01	64	65	98.46%	12.31%	1054	1061	99.34%	0.74	-0.55
Nov-01	49	51	96.08%	19.41%	851	854	99.65%	2.26	0.37
Dec-01	40	40	100.00%	0.00%	758	760	99.74%	-0.32	-1.19
Jan-02	47	47	100.00%	0.00%	966	976	98.98%	-0.68	-1.41
Feb-02	26	26	100.00%	0.00%	789	791	99.75%	-0.25	-1.15
Mar-02	43	44	97.73%	14.90%	912	919	99.24%	0.91	-0.45
Apr-02	42	42	100.00%	0.00%	732	736	99.46%	-0.47	-1.28
May-02	32	33	97.37%	16.01%	723	725	99.72%	1.48	-0.1
Jun-02	34	34	100.00%	0.00%	734	738	99.46%	-0.42	-1.26



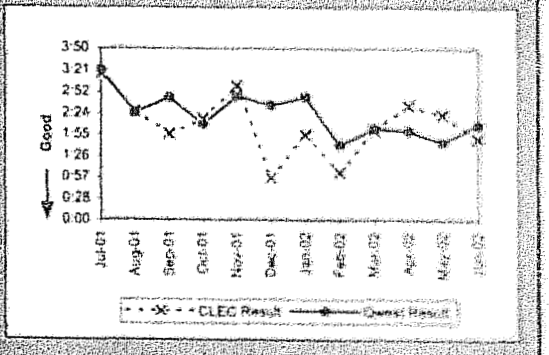
All Trouble Cleared within 48 hours (Percent) (MR-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	88	89	98.88%	10.54%	1180	1188	99.33%	0.49	-0.7
Aug-01	92	92	100.00%	0.00%	1307	1310	99.77%	-0.44	-1.27
Sep-01	65	65	100.00%	0.00%	1016	1018	99.80%	-0.35	-1.21
Oct-01	78	78	100.00%	0.00%	1179	1183	99.66%	-0.5	-1.3
Nov-01	62	62	100.00%	0.00%	1003	1009	99.41%	-0.59	-1.36
Dec-01	47	47	100.00%	0.00%	874	876	99.77%	-0.32	-1.19
Jan-02	62	62	100.00%	0.00%	1103	1108	99.55%	-0.52	-1.31
Feb-02	33	33	100.00%	0.00%	910	911	99.89%	-0.19	-1.11
Mar-02	49	49	100.00%	0.00%	1038	1042	99.62%	-0.42	-1.26
Apr-02	51	51	100.00%	0.00%	861	863	99.77%	-0.33	-1.2
May-02	48	48	100.00%	0.00%	864	864	100.00%	N/A	N/A
Jun-02	45	45	100.00%	0.00%	824	826	99.76%	-0.32	-1.2



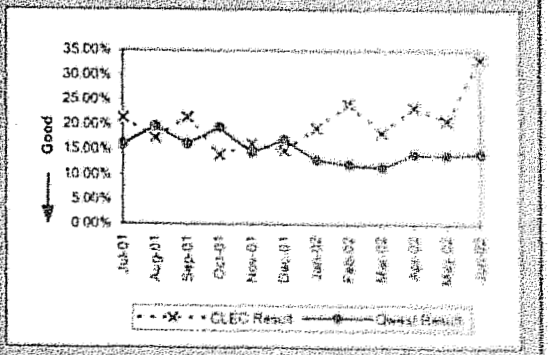
Mean Time to Restore (Hours:Minutes) (MR-6C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	291:13	89	3:16	9:05	3991:15	1188	3:22	-0:09	-1:05
Aug-01	224:40	92	2:27	5:40	3171:13	1310	2:25	0:98	-0:41
Sep-01	127:12	65	1:57	3:43	2794:02	1018	2:45	-0:5	-1:31
Oct-01	178:20	78	2:17	4:37	2569:13	1183	2:10	1:22	-0:26
Nov-01	186:56	62	3:01	6:25	2808:17	1009	2:47	1:18	-0:28
Dec-01	44:30	47	0:57	1:08	2259:27	876	2:35	-1:07	-1:65
Jan-02	120:04	62	1:56	4:36	3061:00	1108	2:46	-0:45	-1:27
Feb-02	35:49	33	1:05	0:58	1549:36	911	1:42	-0:84	-1:51
Mar-02	99:20	49	2:02	5:44	2149:58	1042	2:04	-0:04	-1:03
Apr-02	131:45	51	2:35	5:30	1743:10	863	2:01	0:89	-0:46
May-02	114:35	48	2:23	4:18	1524:27	864	1:46	1:07	-0:35
Jun-02	83:18	45	1:51	2:02	1772:35	826	2:09	-0:35	-1:21



Repair Repeat Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

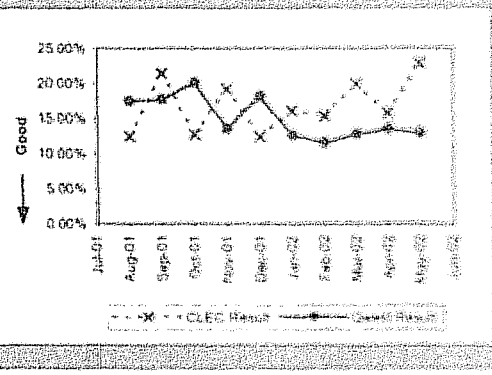
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	19	89	21.35%	40.98%	190	1188	15.99%	1.29	-0.21
Aug-01	18	92	17.39%	37.90%	258	1310	19.69%	-0.54	-1.33
Sep-01	14	65	21.54%	41.11%	165	1018	16.21%	1.11	-0.33
Oct-01	11	78	14.10%	34.80%	230	1183	19.44%	-1.15	-1.7
Nov-01	10	62	16.13%	36.78%	145	1009	14.37%	0.41	-0.75
Dec-01	7	47	14.89%	35.60%	149	876	17.01%	-0.38	-1.23
Jan-02	12	62	19.35%	39.51%	144	1108	13.00%	1.39	-0.16
Feb-02	8	33	24.24%	42.86%	110	911	12.07%	1.91	0.16
Mar-02	5	49	10.37%	38.72%	119	1042	11.42%	1.41	-0.14
Apr-02	12	51	23.53%	42.42%	121	863	14.02%	1.77	0.08
May-02	10	48	20.83%	40.61%	120	864	13.89%	1.3	-0.21
Jun-02	15	45	33.33%	47.14%	118	826	14.29%	3.12	0.89



Checklist #14 - Resale - PBX Repair

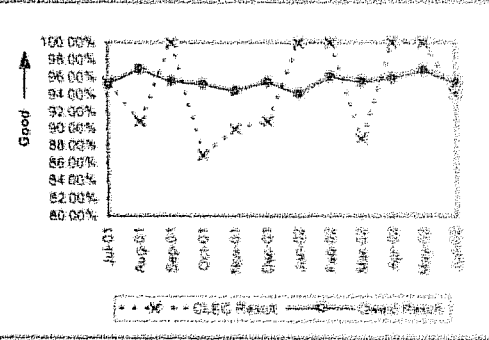
Repair Repeat Report Rate (Percent) (MR-7C*) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	6	48	12.50%	33.07%	117	668	17.52%	-0.88	-1.54
Sep-01	6	28	21.43%	41.03%	91	514	17.70%	0.52	-0.69
Oct-01	5	39	12.82%	33.43%	115	572	20.10%	-1.1	-1.67
Nov-01	5	26	19.23%	39.41%	60	440	13.64%	0.8	-0.51
Dec-01	3	24	12.50%	33.07%	74	408	18.14%	-0.7	-1.42
Jan-02	5	31	16.13%	36.78%	70	552	12.68%	0.58	-0.65
Feb-02	2	13	15.38%	36.08%	50	433	11.55%	0.45	-0.72
Mar-02	5	25	20.00%	40.00%	56	438	12.79%	1.01	-0.39
Apr-02	3	19	15.79%	36.46%	62	458	13.54%	0.32	-0.81
May-02	8	35	22.86%	41.99%	56	432	12.96%	1.55	-0.06
Jun-02									



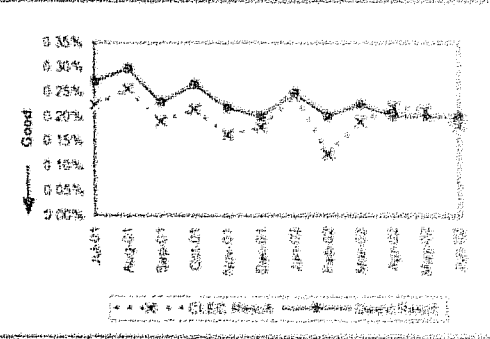
Repair Appointments Met (Percent) (MR-9C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	21	22	95.45%	20.83%	302	317	95.27%	0.04	-1.02
Aug-01	20	22	90.91%	28.75%	320	330	96.97%	-1.31	-0.2
Sep-01	10	10	100.00%	0.00%	259	271	95.57%	0.67	-1.41
Oct-01	20	23	86.96%	33.68%	260	273	95.24%	-1.49	-0.09
Nov-01	18	20	90.00%	30.00%	239	253	94.47%	-0.79	-0.52
Dec-01	10	11	90.91%	28.75%	233	244	95.49%	-0.65	-0.51
Jan-02	22	22	100.00%	0.00%	257	273	94.14%	1.13	-1.68
Feb-02	9	9	100.00%	0.00%	220	229	96.07%	-0.6	-1.36
Mar-02	8	9	88.89%	31.43%	237	248	95.56%	-0.81	-0.51
Apr-02	18	18	100.00%	0.00%	210	219	95.89%	-0.84	-1.51
May-02	21	21	100.00%	0.00%	245	253	96.84%	-0.8	-1.45
Jun-02	16	17	94.12%	23.53%	187	196	95.41%	-0.26	-0.84



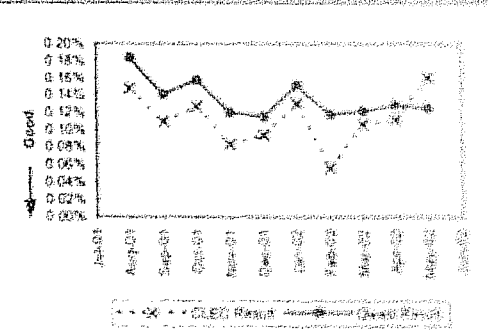
Trouble Rate (Percent) (MR-8) (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	112	49964	0.22%	4.73%	2002	739592	0.27%	-1.94	-2.18
Aug-01	126	48187	0.26%	5.05%	2159	726779	0.30%	-1.61	-1.98
Sep-01	93	48583	0.19%	4.37%	1656	722146	0.23%	-1.69	-2.03
Oct-01	105	48762	0.22%	4.64%	1893	714107	0.27%	-2.07	-2.26
Nov-01	80	48783	0.16%	4.05%	1547	707971	0.22%	-2.49	-2.52
Dec-01	59	32884	0.18%	4.23%	1412	701750	0.20%	-0.86	-1.52
Jan-02	78	32150	0.24%	4.92%	1743	698465	0.25%	-0.24	-1.15
Feb-02	40	31852	0.13%	3.54%	1393	691231	0.20%	-2.95	-2.8
Mar-02	61	31869	0.19%	4.37%	1540	684330	0.23%	-1.24	-1.75
Apr-02	71	32256	0.22%	4.69%	1371	677034	0.20%	0.69	-0.58
May-02	69	32236	0.21%	4.62%	1360	671823	0.20%	0.45	-0.72
Jun-02	50	33013	0.15%	4.26%	1352	671200	0.20%	-0.78	-1.43



Trouble Rate (Percent) (MR-8*) (Parity)

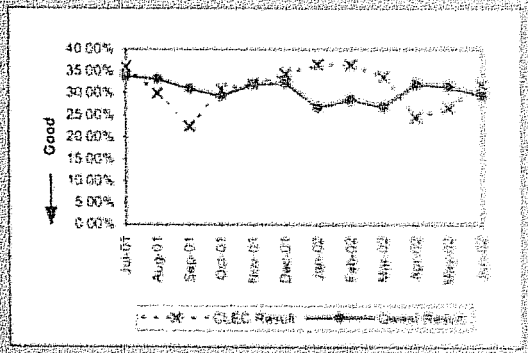
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	73	49187	0.15%	3.85%	1339	726779	0.18%	-1.79	-2.09
Sep-01	53	48583	0.11%	3.30%	1017	722146	0.14%	-1.81	-2.1
Oct-01	62	48762	0.13%	3.56%	1123	714107	0.16%	-1.62	-1.99
Nov-01	41	48783	0.08%	2.90%	851	707971	0.12%	-2.23	-2.36
Dec-01	31	32884	0.09%	3.07%	810	701750	0.12%	-1.1	-1.63
Jan-02	42	32150	0.13%	3.61%	1061	698465	0.15%	-0.96	-1.56
Feb-02	18	31852	0.06%	2.38%	815	691231	0.12%	-3.12	-2.9
Mar-02	34	31869	0.11%	3.26%	832	684330	0.12%	-0.75	-1.45
Apr-02	36	32256	0.11%	3.34%	871	677034	0.13%	-0.83	-1.51
May-02	52	32236	0.16%	4.01%	842	671823	0.13%	1.78	0.03
Jun-02									



Checklist #14 - Resale - PBX Repair

Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)

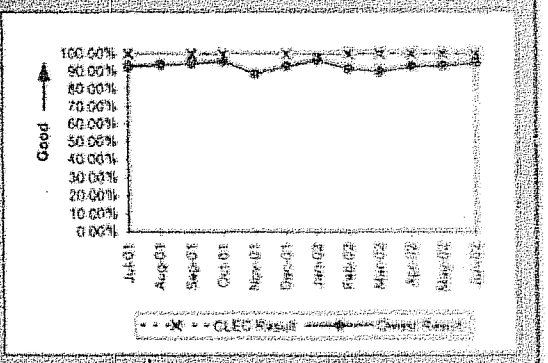
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	63	175	36.00%	48.00%	1022	3024	33.80%	0.6	-0.63
Aug-01	54	180	30.00%	45.83%	1074	3233	33.22%	-0.89	-1.54
Sep-01	27	120	22.50%	41.76%	744	2400	31.00%	-1.96	-2.19
Oct-01	47	152	30.92%	46.22%	788	2681	29.39%	0.41	-0.75
Nov-01	36	116	32.20%	46.73%	730	2277	32.06%	0.04	-0.97
Dec-01	31	90	34.44%	47.52%	674	2086	32.31%	0.43	-0.74
Jan-02	45	123	36.59%	48.17%	638	2381	26.80%	2.32	0.41
Feb-02	23	63	36.51%	48.15%	556	1949	28.53%	1.36	-0.18
Mar-02	31	92	33.70%	47.27%	567	2107	26.91%	1.41	-0.14
Apr-02	23	94	24.47%	42.99%	645	2016	31.99%	-1.53	-1.93
May-02	25	94	26.60%	44.18%	624	1984	31.45%	-0.99	-1.6
Jun-02	28	88	31.82%	46.58%	582	1914	29.36%	0.5	-0.7



Checklist #14 - Resale - Basic ISDN Installation

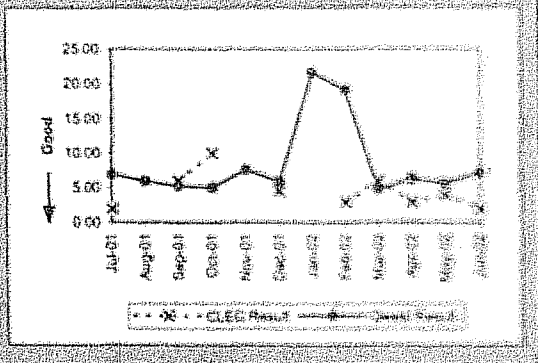
Installation Commitments Met (Percent) (OP-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	1	1	100.00%	0.00%	376	405	92.84%	-0.28	-1.17
Aug-01					468	499	93.79%		
Sep-01	4	4	100.00%	0.00%	320	338	94.67%	-0.47	-1.29
Oct-01	1	1	100.00%	0.00%	539	562	95.91%	-0.21	-1.13
Nov-01					445	502	88.65%		
Dec-01	2	2	100.00%	0.00%	535	576	92.88%	-0.39	-1.24
Jan-02					2215	2298	96.39%		
Feb-02	1	1	100.00%	0.00%	700	763	91.74%	-0.3	-1.18
Mar-02	2	2	100.00%	0.00%	493	550	89.64%	-0.48	-1.29
Apr-02	1	1	100.00%	0.00%	681	734	92.78%	-0.28	-1.17
May-02	1	1	100.00%	0.00%	628	674	93.16%	-0.27	-1.16
Jun-02	1	1	100.00%	0.00%	617	651	94.78%	-0.23	-1.14



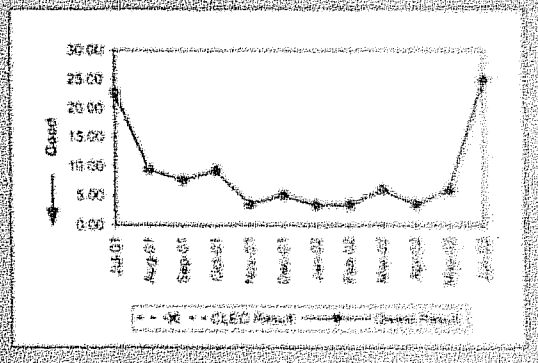
Installation Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	2	1	2.00		2949	425	6.94	-0.29	-1.18
Aug-01					3094	520	5.95		
Sep-01	24	4	6.00	3.83	1815	348	5.22	1.54	-0.06
Oct-01	10	1	10.00		2912	579	5.03	2.65	0.61
Nov-01					3888	514	7.56		
Dec-01	9	2	4.50	2.12	3479	590	5.90	-0.23	-1.14
Jan-02					54935	2546	21.58		
Feb-02	3	1	3.00		19067	995	19.16	-0.9	-1.55
Mar-02	12	2	6.00	1.41	2628	555	4.74	0.75	-0.54
Apr-02	3	1	3.00		4694	741	6.33	-0.33	-1.2
May-02	4	1	4.00		3806	678	5.61	-0.25	-1.15
Jun-02	2	1	2.00		4695	654	7.18	-0.47	-1.29



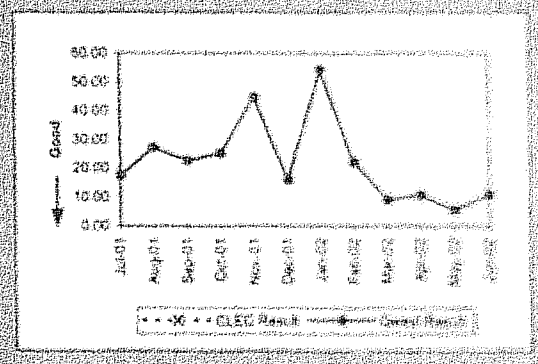
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-1) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					655	29	22.59		
Aug-01					179	19	9.42		
Sep-01					69	9	7.67		
Oct-01					223	24	9.29		
Nov-01					178	51	3.49		
Dec-01					162	32	5.06		
Jan-02					756	222	3.41		
Feb-02					296	84	3.52		
Mar-02					320	54	5.93		
Apr-02					179	51	3.51		
May-02					192	32	6.00		
Jun-02					822	33	24.91		



Delayed Days for Facility Reasons (Average Days) (OP-6B-1) (Parity)-- Dispatches Within MSAs

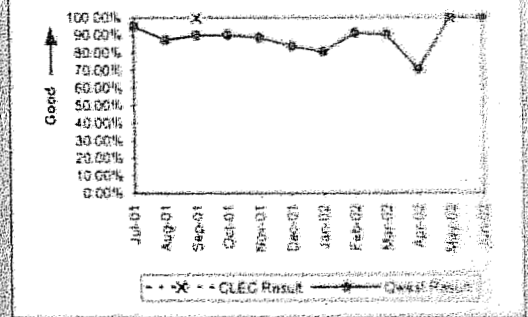
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					278	16	17.38		
Aug-01					461	17	27.12		
Sep-01					272	12	22.67		
Oct-01					202	8	25.25		
Nov-01					805	18	44.72		
Dec-01					208	13	16.00		
Jan-02					325	6	54.17		
Feb-02					155	7	22.14		
Mar-02					27	3	9.00		
Apr-02					32	3	10.67		
May-02					85	15	5.67		
Jun-02					22	2	11.00		



Checklist #14 - Resale - Basic ISDN Installation

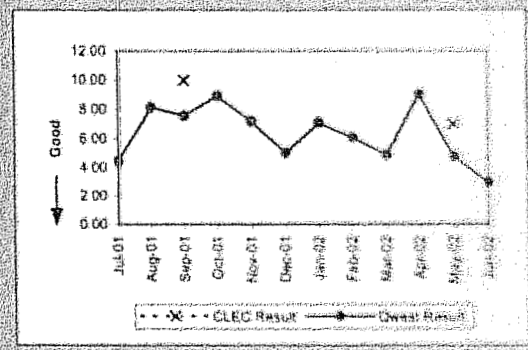
Installation Commitments Met (Percent) (OP-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					20	21	95.24%		
Aug-01					14	16	87.50%		
Sep-01	1	1	100.00%	0.00%	18	20	90.00%	-0.33	-1.2
Oct-01					28	31	90.32%		
Nov-01					16	18	88.89%		
Dec-01					26	31	83.87%		
Jan-02					21	26	80.77%		
Feb-02					21	23	91.30%		
Mar-02					29	32	90.63%		
Apr-02					17	24	70.83%		
May-02	1	1	100.00%	0.00%	17	17	100.00%	N/A	N/A
Jun-02					15	15	100.00%		



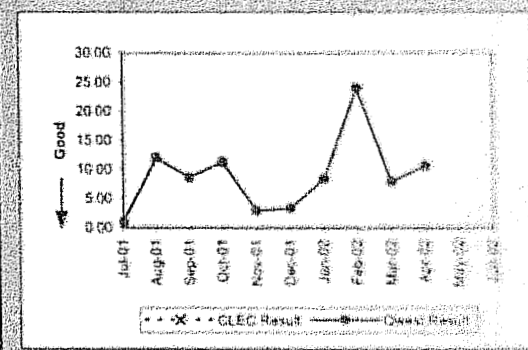
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					99	22	4.50		
Aug-01					138	17	8.12		
Sep-01	10	1	10.00		159	21	7.57	1.02	-0.38
Oct-01					303	34	8.91		
Nov-01					130	18	7.22		
Dec-01					161	32	5.03		
Jan-02					184	26	7.08		
Feb-02					140	23	6.09		
Mar-02					171	35	4.89		
Apr-02					217	24	9.04		
May-02	7	1	7.00		81	17	4.76	0.59	-0.64
Jun-02					44	15	2.93		



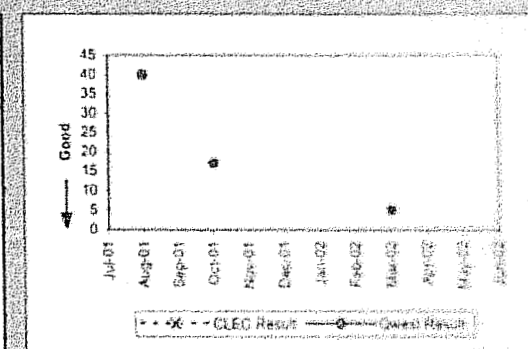
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					1	1	1.00		
Aug-01					12	1	12.00		
Sep-01					26	3	8.67		
Oct-01					34	3	11.33		
Nov-01					6	2	3.00		
Dec-01					17	5	3.40		
Jan-02					42	5	8.40		
Feb-02					48	2	24.00		
Mar-02					16	2	8.00		
Apr-02					75	7	10.71		
May-02									
Jun-02									



Delayed Days for Facility Reasons (Average Days) (OP-6B-2) (Parity)-- Dispatches Outside MSAs

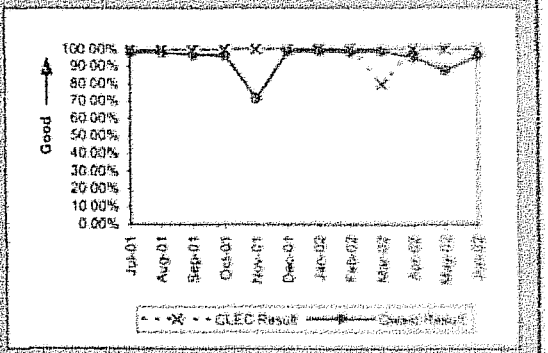
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					40	1	40.00		
Sep-01									
Oct-01					34	2	17.00		
Nov-01									
Dec-01									
Jan-02									
Feb-02									
Mar-02					5	1	5.00		
Apr-02									
May-02									
Jun-02									



Checklist #14 - Resale - Basic ISDN Installation

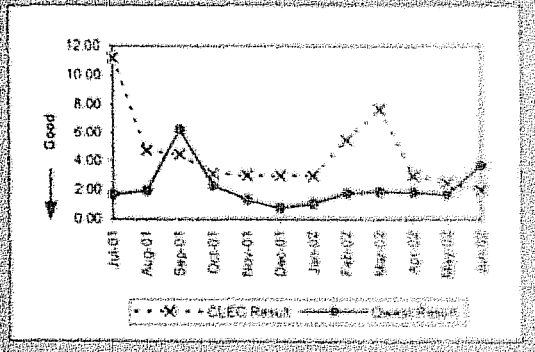
Installation Commitments Met (Percent) (OP-3C) (Parity)– No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	6	6	100.00%	0.00%	115	117	98.29%	-0.37	-1.19
Aug-01	4	4	100.00%	0.00%	218	222	98.20%	-0.27	-1.16
Sep-01	4	4	100.00%	0.00%	91	94	96.81%	-0.36	-1.22
Oct-01	13	13	100.00%	0.00%	83	86	96.51%	-0.64	-1.39
Nov-01	8	8	100.00%	0.00%	71	99	71.72%	-1.71	-2.04
Dec-01	6	6	100.00%	0.00%	73	74	98.65%	-0.28	-1.17
Jan-02	5	5	100.00%	0.00%	195	197	98.98%	-0.22	-1.14
Feb-02	6	6	100.00%	0.00%	97	99	97.98%	-0.34	-1.21
Mar-02	4	5	80.00%	40.00%	137	139	98.56%	1.68	0.02
Apr-02	3	3	100.00%	0.00%	152	160	95.00%	-0.39	-1.24
May-02	3	3	100.00%	0.00%	128	146	87.67%	-0.64	-1.39
Jun-02	4	4	100.00%	0.00%	70	73	95.89%	-0.4	-1.25



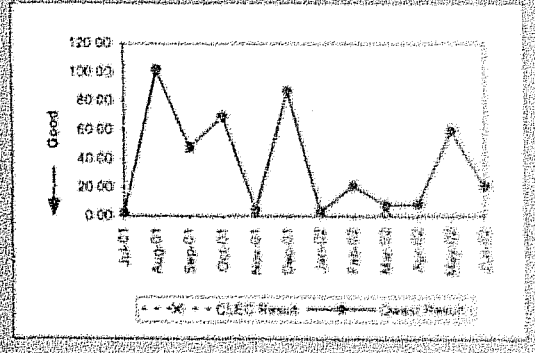
Installation Interval (Average Days) (OP-4C) (Parity)– No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	56	5	11.20	7.89	148	88	1.68	3.72	1.26
Aug-01	19	4	4.75	1.50	262	134	1.96	1.61	-0.02
Sep-01	9	2	4.50	0.71	355	57	6.23	-0.1	-1.05
Oct-01	22	7	3.14	0.69	104	45	2.31	1.13	-0.32
Nov-01	12	4	3.00	0.00	72	55	1.31	1.48	-0.1
Dec-01	6	2	3.00	0.00	35	45	0.78	3.72	1.26
Jan-02	6	2	3.00	0.00	175	160	1.09	2.12	0.29
Feb-02	22	4	5.50	1.73	115	65	1.77	3.72	1.26
Mar-02	23	3	7.67	8.08	156	83	1.88	2.41	0.45
Apr-02	9	3	3.00	0.00	134	73	1.84	1.93	0.17
May-02	5	2	2.50	0.71	150	90	1.67	0.83	-0.45
Jun-02	4	2	2.00	0.00	205	55	3.73	-0.18	-1.11



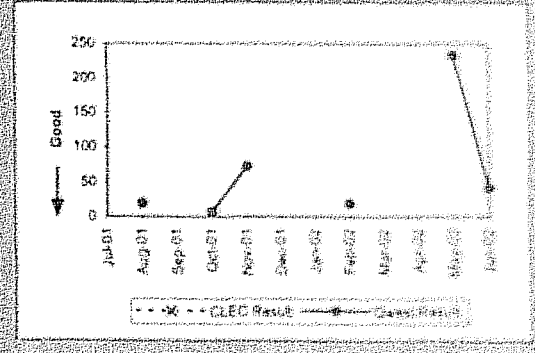
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-3) (Parity)– No Dispatches

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					7	3	2.33		
Aug-01					815	8	101.88		
Sep-01					241	5	48.20		
Oct-01					139	2	69.50		
Nov-01					142	32	4.44		
Dec-01					174	2	87.00		
Jan-02					7	2	3.50		
Feb-02					43	2	21.50		
Mar-02	5	1	5.00		24	3	8.00	-0.27	-1.17
Apr-02					87	10	8.70		
May-02					1017	17	59.82		
Jun-02					85	4	21.25		



Delayed Days for Facility Reasons (Average Days) (OP-6B-3) (Parity)– No Dispatches

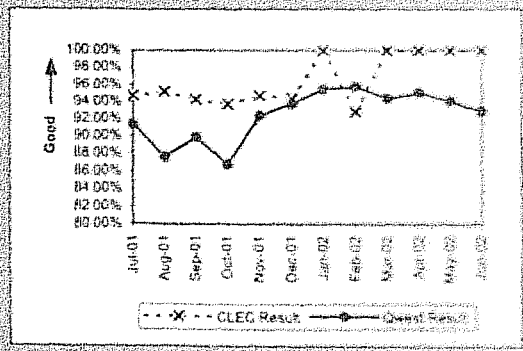
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					20	1	20.00		
Sep-01									
Oct-01					15	2	7.50		
Nov-01					73	1	73.00		
Dec-01									
Jan-02									
Feb-02					19	1	19.00		
Mar-02									
Apr-02									
May-02					233	1	233.00		
Jun-02					42	1	42.00		



Checklist #14 - Resale - Basic ISDN Installation

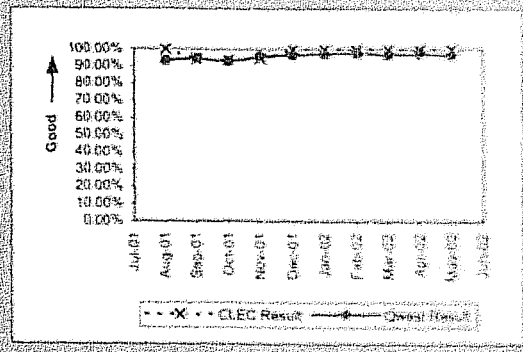
New Service Installation Quality (Percent) (OP-5) (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	18	19	94.74%	22.33%	2729	2986	91.39%	-0.52	-1.31
Aug-01	20	21	95.24%	21.30%	2460	2808	87.61%	-1.06	-1.64
Sep-01	33	35	94.29%	23.21%	2378	2645	89.91%	-0.85	-1.52
Oct-01	30	32	93.75%	24.21%	2318	2671	86.78%	-1.16	-1.7
Nov-01	18	19	94.74%	22.33%	2448	2649	92.41%	-0.38	-1.23
Dec-01	17	18	94.44%	22.91%	2005	2138	93.78%	-0.12	-1.07
Jan-02	18	18	100.00%	0.00%	3182	3333	95.47%	-0.87	-1.53
Feb-02	13	14	92.86%	25.75%	3700	3862	95.81%	0.56	-0.56
Mar-02	13	13	100.00%	0.00%	2447	2593	94.37%	-0.88	-1.53
Apr-02	12	12	100.00%	0.00%	2162	2275	95.03%	-0.79	-1.48
May-02	14	14	100.00%	0.00%	2101	2233	94.09%	-0.93	-1.57
Jun-02	12	12	100.00%	0.00%	1906	2051	92.93%	-0.95	-1.58



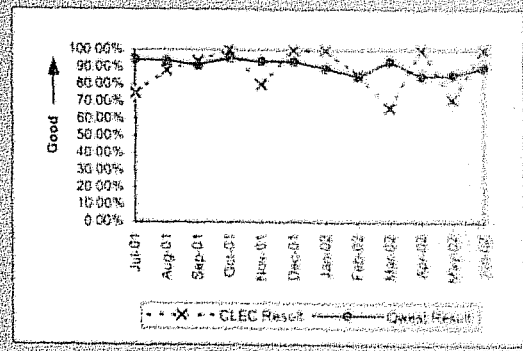
New Service Installation Quality (Percent) (OP-5*) (Parity)

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	21	21	100.00%	0.00%	2617	2808	93.20%	-1.23	-1.75
Sep-01	33	35	94.29%	23.21%	2505	2645	94.71%	0.19	-0.89
Oct-01	30	32	93.75%	24.21%	2488	2671	93.15%	-0.13	-1.08
Nov-01	18	19	94.74%	22.33%	2535	2649	95.70%	0.28	-0.83
Dec-01	18	18	100.00%	0.00%	2065	2138	96.59%	-0.79	-1.48
Jan-02	18	18	100.00%	0.00%	3243	3333	97.30%	-0.66	-1.4
Feb-02	14	14	100.00%	0.00%	3779	3862	97.85%	-0.55	-1.34
Mar-02	13	13	100.00%	0.00%	2512	2593	96.88%	-0.65	-1.39
Apr-02	12	12	100.00%	0.00%	2220	2275	97.58%	-0.54	-1.33
May-02	14	14	100.00%	0.00%	2157	2233	96.60%	-0.7	-1.43
Jun-02									



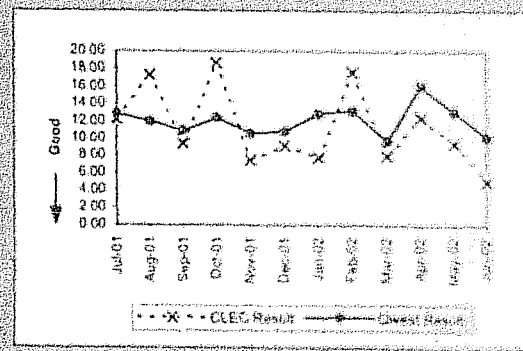
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	3	4	75.00%	43.30%	1457	1543	94.43%	1.22	-0.25
Aug-01	15	17	88.24%	32.22%	1322	1412	93.63%	0.86	-0.47
Sep-01	30	32	93.75%	24.21%	1121	1227	91.36%	-0.47	-1.29
Oct-01	2	2	100.00%	0.00%	1527	1601	95.38%	-0.31	-1.19
Nov-01	4	5	80.00%	40.00%	1027	1102	93.19%	0.95	-0.42
Dec-01	9	9	100.00%	0.00%	738	788	93.65%	-0.78	-1.47
Jan-02	4	4	100.00%	0.00%	1289	1438	89.64%	-0.68	-1.41
Feb-02	6	7	85.71%	34.99%	1052	1256	84.55%	-0.08	-1.05
Mar-02	2	3	66.67%	47.14%	950	1017	93.41%	1.29	-0.22
Apr-02	6	6	100.00%	0.00%	853	1005	84.88%	-1.03	-1.63
May-02	5	7	71.43%	45.18%	679	794	85.52%	0.96	-0.41
Jun-02	3	3	100.00%	0.00%	772	861	89.66%	-0.59	-1.36



Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

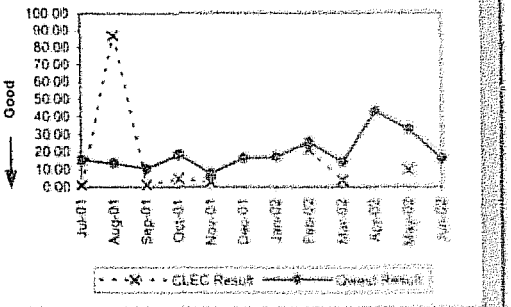
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	48	4	12.25	4.79	20552	1601	12.84	-0.1	-1.06
Aug-01	294	17	17.29	25.22	18989	1579	12.03	1.61	-0.02
Sep-01	300	32	9.38	2.87	14407	1325	10.87	-0.8	-1.49
Oct-01	56	3	18.67	11.50	20586	1661	12.39	2.26	0.37
Nov-01	37	5	7.40	2.97	11793	1116	10.57	-0.63	-1.38
Dec-01	73	8	9.12	3.56	8992	830	10.83	-0.44	-1.27
Jan-02	31	4	7.75	3.10	15802	1229	12.86	-0.81	-1.49
Feb-02	141	8	17.62	13.61	16024	1210	13.24	0.92	-0.44
Mar-02	24	3	8.00	4.58	9649	991	9.74	-0.35	-1.21
Apr-02	75	6	12.50	8.17	15951	991	16.10	-0.35	-1.21
May-02	66	7	9.43	5.50	10203	776	13.15	-0.52	-1.32
Jun-02	15	3	5.00	1.00	8743	857	10.20	-0.85	-1.51



Checklist #14 - Resale - Basic ISDN Installation

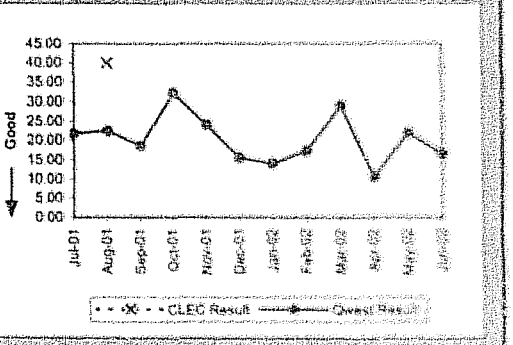
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	1	1	1 00		1667	108	15.44	-0 93	-1 57
Aug-01	87	1	87 00		2696	198	13.62	2 14	0 3
Sep-01	3	2	1 50	0 71	1932	184	10 50	-0 81	-1 49
Oct-01	5	1	5 00		1839	99	18.58	-0 44	-1 27
Nov-01	3	1	3 00		794	101	7 86	-0 34	-1 21
Dec-01					1619	97	16.69		
Jan-02					2927	171	17 12		
Feb-02	43	2	21 50	0 71	4750	184	25.82	-0 33	-1 2
Mar-02	4	1	4 00		1058	74	14 30	-0 71	-1 43
Apr-02					6816	158	43 14		
May-02	20	2	10 00	0 00	3755	113	33.23	-1	-1 61
Jun-02					1583	97	16.32		



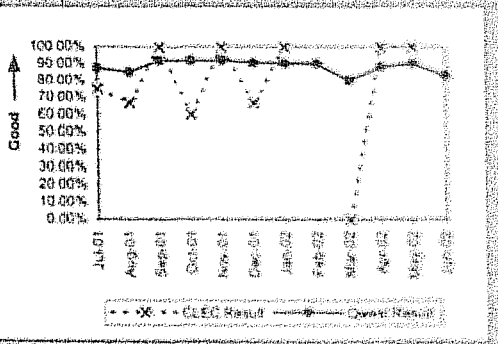
Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					1178	54	21.81		
Aug-01	40	1	40.00		1465	65	22.54	1 96	0.19
Sep-01					784	42	18.67		
Oct-01					1708	53	32.23		
Nov-01					1444	60	24.07		
Dec-01					374	24	15 58		
Jan-02					535	38	14 08		
Feb-02					294	17	17 29		
Mar-02					87	3	29.00		
Apr-02					74	7	10 57		
May-02					198	9	22.00		
Jun-02					83	5	16.60		



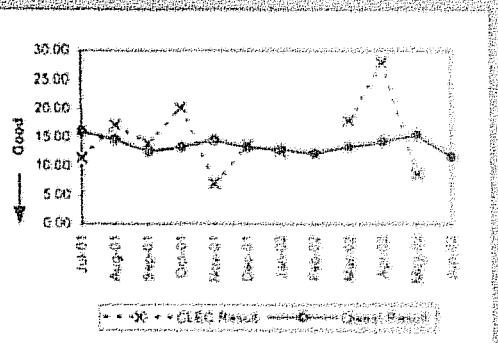
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	3	4	75.00%	43 30%	364	416	87 50%	0 67	-0 59
Aug-01	4	6	66.67%	47.14%	344	404	85 15%	1 11	-0 32
Sep-01	1	1	100.00%	0.00%	460	501	91.82%	-0 3	-1 18
Oct-01	3	5	60 00%	48 99%	417	454	91 85%	1 89	0 15
Nov-01	2	2	100 00%	0 00%	392	426	92.02%	-0 42	-1 25
Dec-01	2	3	66.67%	47 14%	267	294	90.82%	1 08	-0 34
Jan-02	1	1	100 00%	0.00%	286	317	90.22%	-0 33	-1 2
Feb-02					445	493	90 26%		
Mar-02	0	1	0 00%	0 00%	307	383	80 16%	1 29	-0 21
Apr-02	1	1	100 00%	0 00%	314	356	88 20%	-0 37	-1 22
May-02	4	4	100.00%	0.00%	396	439	90.21%	-0 56	-1 4
Jun-02					273	328	83.23%		



Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

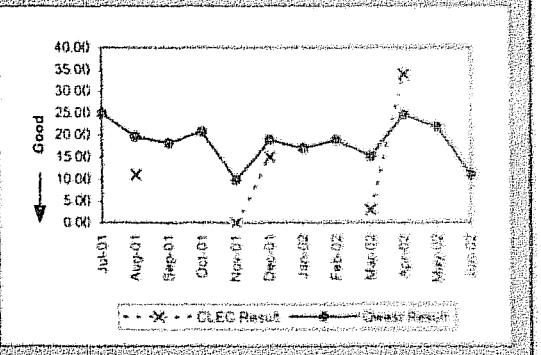
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	46	4	11 50	10 97	6954	436	15 95	-0 37	-1 23
Aug-01	103	6	17 17	9 26	6604	451	14 64	1 85	0 13
Sep-01	14	1	14 00		6462	516	12 52	1 5	-0 09
Oct-01	101	5	20 20	14 02	6402	481	13 31	1 87	0 13
Nov-01	21	3	7 00	6 24	7287	501	14 54	-0 98	-1 6
Dec-01	41	3	13 67	12 66	3929	297	13 23	0 44	-0 73
Jan-02	25	2	12 50	0 71	4257	331	12 86	-0 04	-1 02
Feb-02					5969	489	12 21		
Mar-02	18	1	18 00		5191	388	13 38	0 86	-0 48
Apr-02	56	2	28 00	28 28	5079	356	14 27	1 68	0 02
May-02	35	4	8 75	4 99	6917	449	15 41	-1 01	-1 61
Jun-02					3831	328	11 68		



Checklist #14 - Resale - Basic ISDN Installation

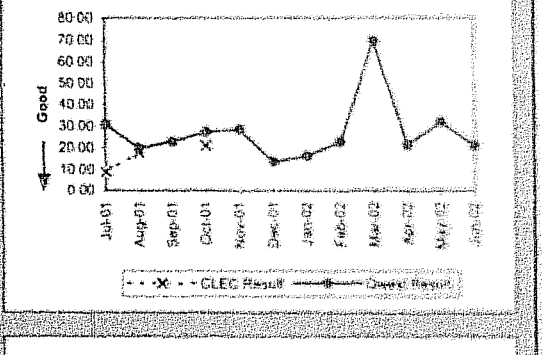
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)– Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					1513	61	24.80		
Aug-01	11	1	11.00		1153	59	19.54	-0.43	-1.26
Sep-01					652	36	18.11		
Oct-01					969	47	20.62		
Nov-01	0	1	0.00		1060	108	9.81	-0.65	-1.39
Dec-01	15	1	15.00		582	31	18.77	-0.16	-1.1
Jan-02					591	35	16.89		
Feb-02					939	50	18.78		
Mar-02	3	1	3.00		1235	82	15.06	-0.77	-1.47
Apr-02	34	1	34.00		985	40	24.62	1.08	-0.35
May-02					910	42	21.67		
Jun-02					626	58	10.79		



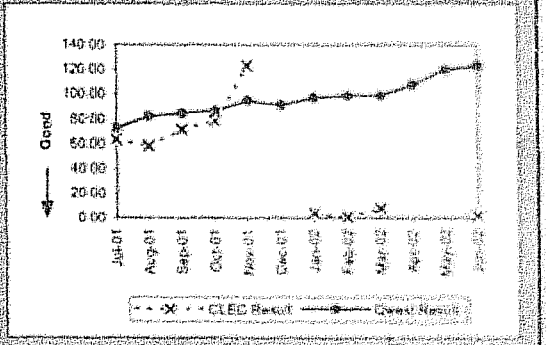
Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)– Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	9	1	9.00		1172	38	30.84	-0.47	-1.29
Aug-01	18	1	18.00		1022	52	19.65	-0.08	-1.05
Sep-01					638	28	22.79		
Oct-01	42	2	21.00	8.49	843	31	27.19	-0.32	-1.19
Nov-01					737	26	28.35		
Dec-01					230	17	13.53		
Jan-02					360	22	16.36		
Feb-02					91	4	22.75		
Mar-02					488	7	69.71		
Apr-02					149	7	21.29		
May-02					191	6	31.83		
Jun-02					63	3	21.00		



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

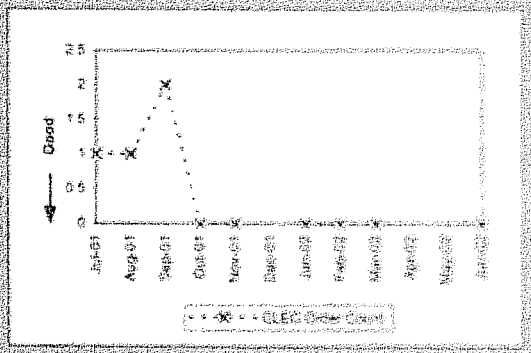
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	191	3	63.67	72.07	38654	534	72.39	-0.15	-1.09
Aug-01	176	3	58.67	95.62	42906	522	82.20	-0.37	-1.22
Sep-01	216	3	72.00	101.17	41208	485	84.96	-0.2	-1.12
Oct-01	235	3	78.33	114.89	42500	490	86.73	-0.12	-1.07
Nov-01	246	2	123.00	154.15	46509	491	94.72	2.75	0.67
Dec-01					49209	540	91.13		
Jan-02	4	1	4.00		52546	541	97.13	-0.77	-1.47
Feb-02	1	1	1.00		58613	594	98.68	-0.84	-1.51
Mar-02	16	2	8.00	9.00	62414	631	98.91	-1.19	-1.72
Apr-02					59917	556	107.76		
May-02					65188	545	119.61		
Jun-02	2	1	2.00		68375	556	122.98	-0.94	-1.57



Checklist #14 - Resale - Basic ISDN Installation

Count of Pending Orders Delayed for Facilities Reasons Basic Rate ISDN (OP-15B) (Diagnostic)

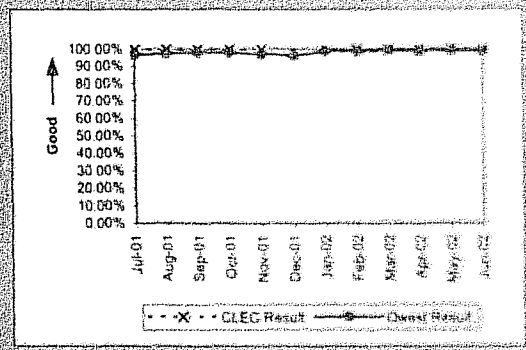
Date	CLEC Order Count
Jul-01	1
Aug-01	1
Sep-01	2
Oct-01	0
Nov-01	0
Dec-01	
Jan-02	0
Feb-02	0
Mar-02	0
Apr-02	
May-02	
Jun-02	0



Checklist #14 - Resale - Basic ISDN Repair

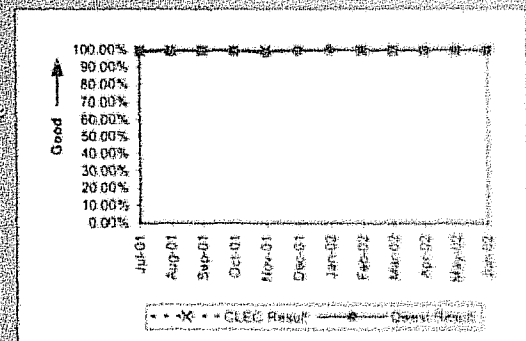
Out of Service Cleared within 24 hours (Percent) (MR-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	9	9	100.00%	0.00%	862	888	97.07%	-0.52	-1.32
Aug-01	6	6	100.00%	0.00%	938	960	97.71%	-0.37	-1.23
Sep-01	5	5	100.00%	0.00%	686	698	98.28%	-0.29	-1.18
Oct-01	8	8	100.00%	0.00%	760	775	98.06%	-0.4	-1.24
Nov-01	1	1	100.00%	0.00%	618	636	97.17%	-0.17	-1.1
Dec-01					471	489	96.32%		
Jan-02					565	572	98.78%		
Feb-02	1	1	100.00%	0.00%	514	520	98.85%	-0.11	-1.07
Mar-02	1	1	100.00%	0.00%	478	481	99.38%	-0.08	-1.05
Apr-02	1	1	100.00%	0.00%	550	556	98.92%	-0.1	-1.06
May-02	4	4	100.00%	0.00%	573	577	99.31%	-0.17	-1.1
Jun-02	3	3	100.00%	0.00%	598	604	99.01%	-0.17	-1.11



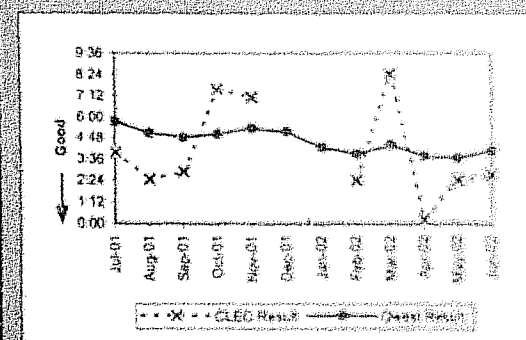
All Troubles Cleared within 48 hours (Percent) (MR-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	9	9	100.00%	0.00%	884	892	99.10%	-0.28	-1.17
Aug-01	6	6	100.00%	0.00%	954	960	99.38%	-0.19	-1.12
Sep-01	5	5	100.00%	0.00%	700	701	99.86%	-0.08	-1.05
Oct-01	8	8	100.00%	0.00%	775	779	99.49%	-0.2	-1.12
Nov-01	1	1	100.00%	0.00%	631	640	98.59%	-0.12	-1.07
Dec-01					489	491	99.59%		
Jan-02					575	576	99.83%		
Feb-02	1	1	100.00%	0.00%	519	520	99.81%	-0.04	-1.03
Mar-02	1	1	100.00%	0.00%	484	486	99.59%	-0.06	-1.04
Apr-02	1	1	100.00%	0.00%	562	563	99.82%	-0.04	-1.03
May-02	4	4	100.00%	0.00%	583	583	100.00%	N/A	N/A
Jun-02	3	3	100.00%	0.00%	603	605	99.67%	-0.1	-1.06



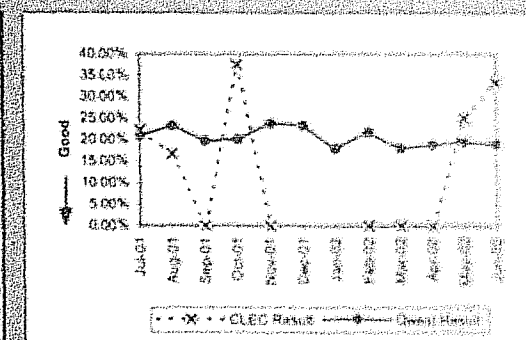
Mean Time to Restore (Hours:Minutes) (MR-6A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	35:48	9	3:59	4:25	5082:56	892	5:42	-0.52	-1.31
Aug-01	14:54	6	2:29	1:43	4896:32	960	5:06	-0.69	-1.42
Sep-01	14:33	5	2:55	1:29	3389:24	701	4:50	-0.71	-1.43
Oct-01	60:47	8	7:36	6:01	3918:56	779	5:02	2.46	0.49
Nov-01	7:09	1	7:09		3438:23	640	5:22	1.87	0.13
Dec-01					2528:47	491	5:09		
Jan-02					2463:23	576	4:17		
Feb-02	2:27	1	2:27		2035:07	520	3:55	-0.28	-1.17
Mar-02	6:28	1	6:28		2151:30	486	4:26	1.45	-0.12
Apr-02	0:16	1	0:16		2147:34	553	3:49	-0.72	-1.44
May-02	9:48	4	2:27	0:54	2149:36	583	3:41	-0.59	-1.36
Jun-02	8:13	3	2:44	1:42	2492:24	605	4:07	-0.46	-1.28



Repair Repeat Report Rate (Percent) (MR-7A) (Parity)-- Dispatches Within MSAs

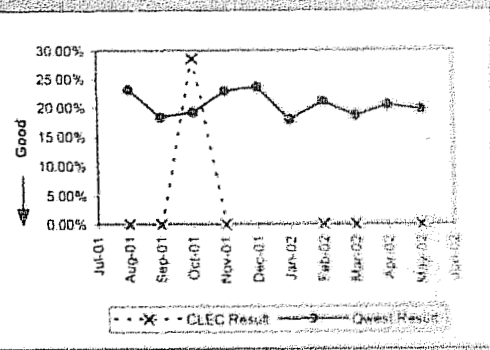
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	2	9	22.22%	41.57%	187	893	20.94%	0.14	-0.92
Aug-01	1	6	16.67%	37.27%	223	964	23.13%	-0.37	-1.23
Sep-01	0	5	0.00%	0.00%	139	704	19.74%	-1.11	-1.67
Oct-01	3	8	37.50%	48.41%	156	780	20.00%	1.13	-0.31
Nov-01	0	1	0.00%	0.00%	152	642	23.68%	-0.56	-1.34
Dec-01					114	491	23.22%		
Jan-02					103	576	17.88%		
Feb-02	0	1	0.00%	0.00%	113	520	21.73%	-0.53	-1.32
Mar-02	0	1	0.00%	0.00%	87	487	17.86%	-0.47	-1.28
Apr-02	0	1	0.00%	0.00%	106	564	18.79%	-0.48	-1.29
May-02	1	4	25.00%	43.30%	113	583	19.38%	0.3	-0.82
Jun-02	1	3	33.33%	47.14%	114	605	18.84%	0.57	-0.65



Checklist #14 - Resale - Basic ISDN Repair

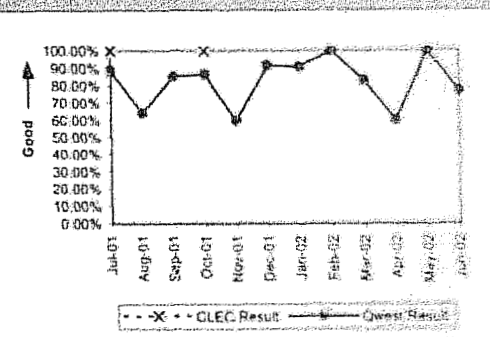
Repair Repeat Report Rate (Percent) (MR-7A*) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	0	5	0.00%	0.00%	174	752	23.14%	-1.22	-1.74
Sep-01	0	5	0.00%	0.00%	101	551	18.33%	-1.05	-1.64
Oct-01	2	7	28.57%	45.18%	117	611	19.15%	0.62	-0.62
Nov-01	0	1	0.00%	0.00%	118	515	22.91%	-0.54	-1.33
Dec-01					95	403	23.57%		
Jan-02					87	485	17.94%		
Feb-02	0	1	0.00%	0.00%	85	405	20.99%	-0.51	-1.31
Mar-02	0	1	0.00%	0.00%	72	388	18.56%	-0.48	-1.29
Apr-02					93	456	20.39%		
May-02	0	3	0.00%	0.00%	93	473	19.66%	-0.85	-1.52
Jun-02									



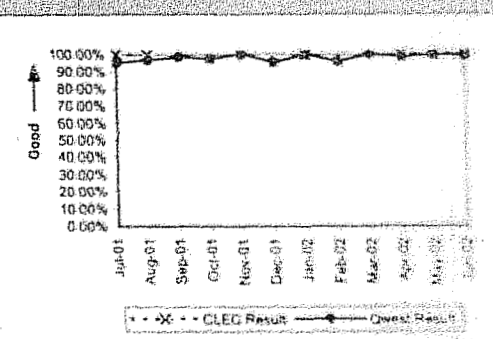
Repair Appointments Met (Percent) (MR-9A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	1	1	100.00%	0.00%	16	18	88.89%	-0.34	-1.21
Aug-01					9	14	64.29%		
Sep-01					18	21	85.71%		
Oct-01	1	1	100.00%	0.00%	13	15	86.67%	-0.38	-1.23
Nov-01					12	20	60.00%		
Dec-01					11	12	91.67%		
Jan-02					10	11	90.91%		
Feb-02					5	5	100.00%		
Mar-02					10	12	83.33%		
Apr-02					9	15	60.00%		
May-02					10	10	100.00%		
Jun-02					10	13	76.92%		



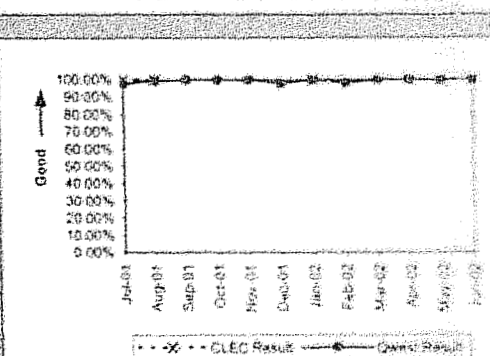
Out of Service Cleared within 24 hours (Percent) (MR-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	1	1	100.00%	0.00%	81	85	95.29%	-0.22	-1.13
Aug-01	5	5	100.00%	0.00%	129	133	96.99%	-0.39	-1.24
Sep-01					70	71	98.59%		
Oct-01					78	80	97.50%		
Nov-01					52	52	100.00%		
Dec-01					44	46	95.65%		
Jan-02	4	4	100.00%	0.00%	54	54	100.00%	N/A	N/A
Feb-02					48	50	96.00%		
Mar-02					54	54	100.00%		
Apr-02	1	1	100.00%	0.00%	63	64	98.44%	-0.13	-1.08
May-02	1	1	100.00%	0.00%	55	55	100.00%	N/A	N/A
Jun-02	1	1	100.00%	0.00%	77	78	98.72%	-0.11	-1.07



All Troubles Cleared within 48 hours (Percent) (MR-4B) (Parity)-- Dispatches Outside MSAs

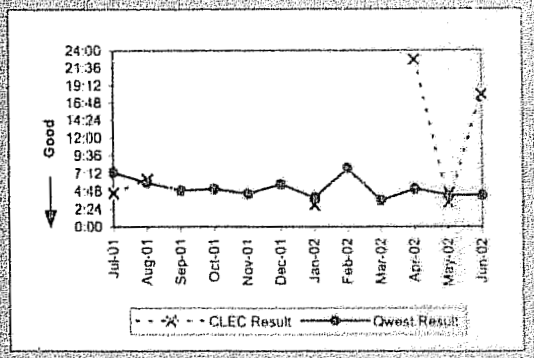
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	1	1	100.00%	0.00%	86	88	97.73%	-0.15	-1.09
Aug-01	5	5	100.00%	0.00%	132	133	99.25%	-0.19	-1.12
Sep-01					71	71	100.00%		
Oct-01					80	80	100.00%		
Nov-01					52	52	100.00%		
Dec-01					45	46	97.83%		
Jan-02	4	4	100.00%	0.00%	54	54	100.00%	N/A	N/A
Feb-02					50	51	98.04%		
Mar-02					54	54	100.00%		
Apr-02	1	1	100.00%	0.00%	64	64	100.00%	N/A	N/A
May-02	1	1	100.00%	0.00%	55	55	100.00%	N/A	N/A
Jun-02	1	1	100.00%	0.00%	78	78	100.00%	N/A	N/A



Checklist #14 - Resale - Basic ISDN Repair

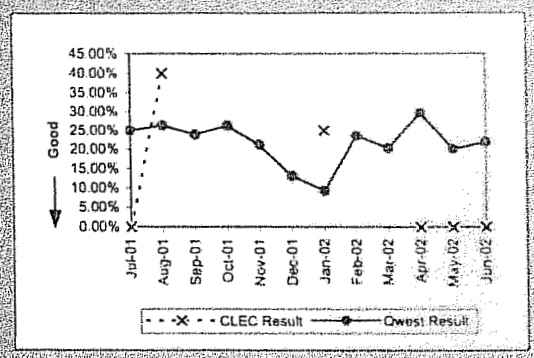
Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)-- Dispatches Outside MSAs

		CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	4:36	1	4:36		647:39	88	7:22	-0.26	-1.16
	6:27	3	6:27	6:59	793:23	133	5:58	1.36	-0.17
					347:03	71	4:53		
					407:55	80	5:06		
					233:17	52	4:29		
					264:45	46	5:45		
	13:34	4	3:01	0:11	214:52	54	3:59	-0.42	-1.26
					404:52	51	7:56		
					195:50	54	3:38		
	22:46	1	22:46		328:36	64	5:08	1.98	0.2
	3:20	1	3:20		238:43	55	4:20	-0.23	-1.14
	18:00	1	18:00		335:21	78	4:18	1.88	0.14



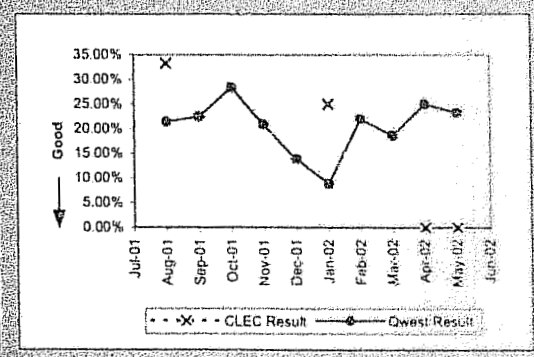
Repair Repeat Report Rate (Percent) (MR-7B) (Parity)-- Dispatches Outside MSAs

		CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	0	1	0.00%	0.00%	22	88	25.00%	-0.57	-1.35
	3	3	46.99%	46.99%	35	133	26.32%	0.64	-0.61
					17	71	23.94%		
					21	80	26.25%		
					11	52	21.15%		
					6	46	13.04%		
	1	4	25.00%	43.30%	5	54	9.26%	0.82	-0.5
					12	51	23.53%		
					11	54	20.37%		
	0	1	0.00%	0.00%	19	64	29.69%	-0.64	-1.39
	0	1	0.00%	0.00%	11	55	20.00%	-0.5	-1.3
	0	1	0.00%	0.00%	17	78	21.79%	-0.52	-1.32



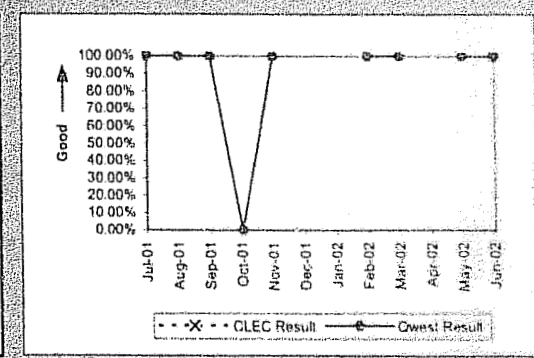
Repair Repeat Report Rate (Percent) (MR-7B*) (Parity)-- Dispatches Outside MSAs

		CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
	1	3	33.33%	47.14%	23	107	21.50%	0.44	-0.73
					11	49	22.45%		
					19	67	28.36%		
					9	43	20.93%		
					5	36	13.89%		
	1	4	25.00%	43.30%	3	34	8.82%	0.8	-0.51
					9	41	21.95%		
					8	43	18.60%		
	0	1	0.00%	0.00%	13	52	25.00%	-0.57	-1.35
	0	1	0.00%	0.00%	10	43	23.26%	-0.54	-1.33



Repair Appointments Met (Percent) (MR-9B) (Parity)-- Dispatches Outside MSAs

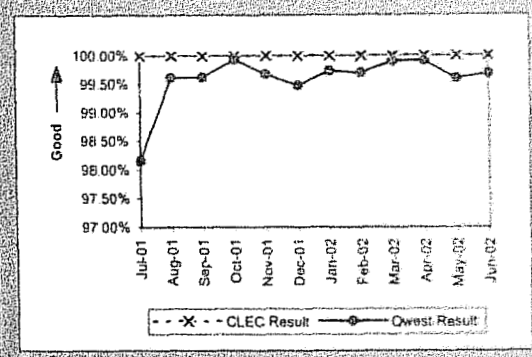
		CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
					3	3	100.00%		
					1	1	100.00%		
					1	1	100.00%		
					0	1	0.00%		
					2	2	100.00%		
					2	2	100.00%		
					1	1	100.00%		
					1	1	100.00%		
					1	1	100.00%		



Checklist #14 - Resale - Basic ISDN Repair

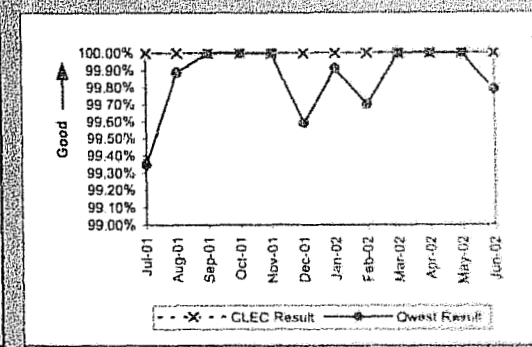
Out of Service Cleared within 24 hours (Percent) (MR-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	4	4	100.00%	0.00%	1496	1524	98.16%	-0.27	-1.17
[illegible]	14	14	100.00%	0.00%	1784	1791	99.61%	-0.23	-1.14
[illegible]	13	13	100.00%	0.00%	1318	1323	99.62%	-0.22	-1.13
[illegible]	9	9	100.00%	0.00%	1579	1580	99.94%	-0.08	-1.05
[illegible]	13	13	100.00%	0.00%	1207	1211	99.67%	-0.21	-1.13
[illegible]	7	7	100.00%	0.00%	959	964	99.48%	-0.19	-1.12
[illegible]	9	9	100.00%	0.00%	1101	1104	99.73%	-0.16	-1.09
[illegible]	7	7	100.00%	0.00%	992	995	99.70%	-0.14	-1.09
[illegible]	3	3	100.00%	0.00%	1022	1023	99.90%	-0.08	-1.05
[illegible]	8	8	100.00%	0.00%	1023	1024	99.90%	-0.09	-1.05
[illegible]	6	6	100.00%	0.00%	979	983	99.59%	-0.16	-1.09
[illegible]	10	10	100.00%	0.00%	933	936	99.68%	-0.18	-1.11



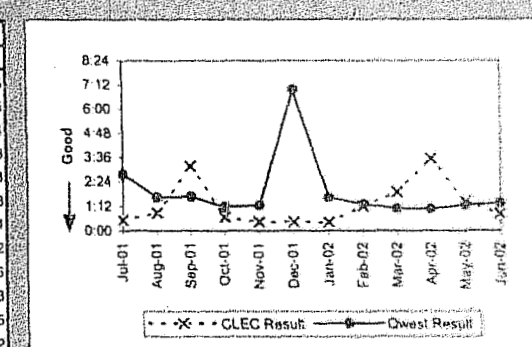
All Trouble Cleared within 48 hours (Percent) (MR-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	4	4	100.00%	0.00%	1526	1536	99.35%	-0.16	-1.1
[illegible]	14	14	100.00%	0.00%	1798	1800	99.89%	-0.12	-1.08
[illegible]	13	13	100.00%	0.00%	1336	1336	100.00%	N/A	N/A
[illegible]	9	9	100.00%	0.00%	1593	1593	100.00%	N/A	N/A
[illegible]	13	13	100.00%	0.00%	1222	1222	100.00%	N/A	N/A
[illegible]	7	7	100.00%	0.00%	971	975	99.59%	-0.17	-1.1
[illegible]	9	9	100.00%	0.00%	1122	1123	99.91%	-0.09	-1.05
[illegible]	7	7	100.00%	0.00%	1004	1007	99.70%	-0.14	-1.09
[illegible]	7	7	100.00%	0.00%	1030	1030	100.00%	N/A	N/A
[illegible]	8	8	100.00%	0.00%	1036	1036	100.00%	N/A	N/A
[illegible]	6	6	100.00%	0.00%	991	991	100.00%	N/A	N/A
[illegible]	10	10	100.00%	0.00%	943	945	99.79%	-0.14	-1.09



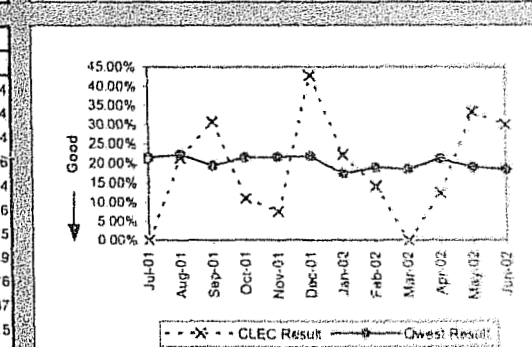
Mean Time to Restore (Hours:Minutes) (MR-6C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	2:16	4	0:32	0:30	4281:51	1536	2:47	-0.25	-1.15
[illegible]	12:36	14	0:54	1:08	2977:54	1800	1:39	-0.4	-1.25
[illegible]	43:16	13	3:10	4:23	2259:00	1336	1:41	2.37	0.44
[illegible]	6:13	9	0:41	0:31	1891:06	1593	1:11	-0.7	-1.43
[illegible]	5:47	13	0:27	0:33	1523:19	1222	1:15	-0.95	-1.58
[illegible]	3:10	7	0:27	0:19	6764:53	975	6:56	-0.14	-1.08
[illegible]	3:54	9	0:26	0:32	1836:30	1123	1:38	-0.24	-1.14
[illegible]	8:52	7	1:13	1:22	1324:52	1007	1:19	-0.04	-1.02
[illegible]	15:26	7	1:55	2:51	1124:53	1030	1:06	1.21	-0.26
[illegible]	39:53	8	3:39	6:20	1103:05	1036	1:04	2.14	0.3
[illegible]	8:41	6	1:27	1:23	1247:10	991	1:16	0.83	-0.5
[illegible]	8:33	10	0:51	1:03	1277:15	945	1:21	-0.33	-1.2



Repair Repeat Report Rate (Percent) (MR-7C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	0	4	0.00%	0.00%	332	1536	21.61%	-1.05	-1.64
[illegible]	3	14	21.43%	41.03%	400	1800	22.22%	-0.07	-1.04
[illegible]	4	13	30.77%	46.15%	260	1336	19.46%	0.99	-0.4
[illegible]	1	9	11.11%	31.43%	343	1593	21.53%	-0.76	-1.46
[illegible]	1	13	7.69%	26.65%	265	1222	21.69%	-1.22	-1.74
[illegible]	3	7	42.86%	49.49%	213	975	21.85%	1.22	-0.26
[illegible]	2	9	22.22%	41.57%	195	1123	17.36%	0.41	-0.75
[illegible]	1	7	14.29%	34.99%	191	1007	18.97%	-0.31	-1.19
[illegible]	0	7	0.00%	0.00%	191	1030	18.54%	-1.26	-1.76
[illegible]	1	8	12.50%	33.07%	220	1036	21.24%	-0.6	-1.37
[illegible]	2	6	33.33%	47.14%	189	991	19.07%	0.83	-0.5
[illegible]	3	10	30.00%	45.83%	174	945	18.41%	0.9	-0.45



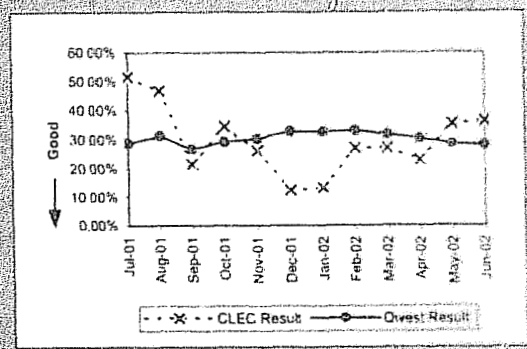
Checklist #14 - Resale - Basic ISDN Repair

Trouble Report Rate (Percent) (MR-7C*) (Parity)– No Dispatches

Checklist #14 - Resale - Basic ISDN Repair

Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)

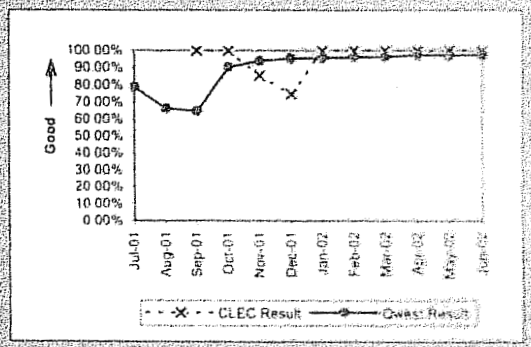
[illegible]	[illegible]	[illegible]	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
[illegible]	18	39	51.72%	49.97%	1018	3535	28.80%	2.57	0.56
[illegible]	47	47	46.81%	49.90%	1318	4215	31.27%	2.21	0.35
[illegible]	5	23	21.74%	41.25%	775	2886	26.85%	-0.55	-1.34
[illegible]	9	26	34.62%	47.57%	1015	3468	29.27%	0.6	-0.63
[illegible]	1	19	26.32%	44.03%	832	2748	30.28%	-0.37	-1.23
[illegible]	1	8	12.50%	33.07%	739	2251	32.83%	-1.22	-1.74
[illegible]	2	15	13.33%	33.99%	850	2603	32.65%	-1.59	-1.97
[illegible]	3	11	27.27%	44.54%	783	2361	33.16%	-0.41	-1.25
[illegible]	3	11	27.27%	44.64%	732	2303	31.78%	-0.32	-1.19
[illegible]	3	13	23.08%	42.13%	727	2391	30.41%	-0.57	-1.35
[illegible]	6	17	35.29%	47.79%	649	2278	28.49%	0.62	-0.62
[illegible]	8	22	36.36%	48.10%	836	2264	26.09%	0.85	-0.48



Checklist #14 - Resale - Qwest DSL Installation

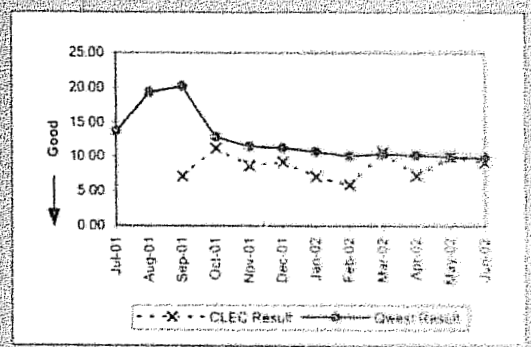
Installation Commitments Met (Percent) (OP-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]					4251	5428	78.87%		
[illegible]					5631	8459	66.57%		
[illegible]	5	5	100.00%	0.00%	6680	10160	64.96%	-1.64	-2
[illegible]	8	8	100.00%	0.00%	8609	9524	90.39%	-0.92	-1.56
[illegible]	6	7	85.71%	34.99%	7778	8266	94.10%	0.83	-0.5
[illegible]	3	4	75.00%	43.30%	7874	8239	95.57%	1.35	-0.18
[illegible]	5	5	100.00%	0.00%	7126	7430	95.91%	-0.46	-1.28
[illegible]	1	1	100.00%	0.00%	6485	6734	96.30%	-0.2	-1.12
[illegible]	3	3	100.00%	0.00%	6272	6513	96.30%	-0.34	-1.21
[illegible]	3	3	100.00%	0.00%	6301	6464	97.48%	-0.28	-1.17
[illegible]	1	1	100.00%	0.00%	5746	5911	97.21%	-0.17	-1.1
[illegible]	5	5	100.00%	0.00%	5396	5527	97.63%	-0.35	-1.21



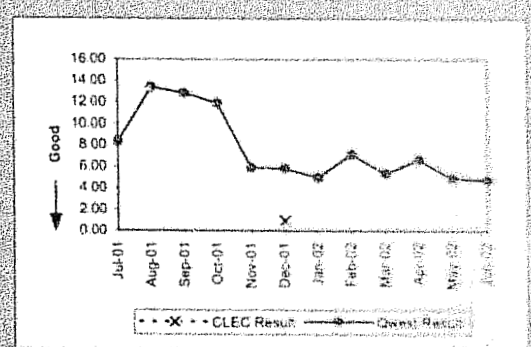
Installation Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]					78419	5729	13.69		
[illegible]					167495	8634	19.40		
[illegible]	36	5	7.20	3.56	209987	10387	20.22	-1.95	-2.19
[illegible]	90	8	11.25	3.77	124841	9684	12.89	-0.5	-1.3
[illegible]	61	7	8.71	3.64	95280	8303	11.48	-1.18	-1.72
[illegible]	37	4	9.25	4.27	93024	8274	11.24	-0.73	-1.44
[illegible]	36	5	7.20	2.28	80440	7505	10.72	-1.05	-1.64
[illegible]	6	1	6.00		68431	6781	10.09	-0.8	-1.49
[illegible]	32	3	10.67	2.08	67974	6548	10.38	0.87	-0.47
[illegible]	22	3	7.33	3.79	66658	6501	10.25	-1.46	-1.89
[illegible]	10	1	10.00		59278	5928	10.00	-0.95	-1.58
[illegible]	46	5	9.20	5.12	54860	5564	9.86	-0.49	-1.3



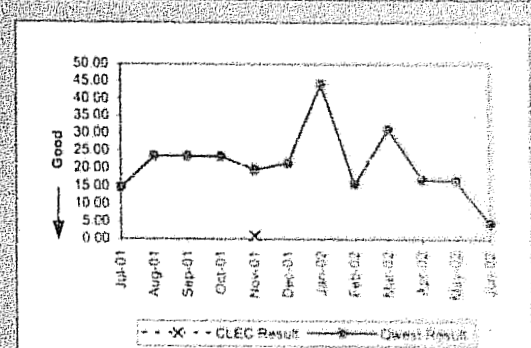
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-1) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]					6490	777	8.35		
[illegible]					12966	969	13.38		
[illegible]					16844	1310	12.86		
[illegible]					6810	572	11.91		
[illegible]					2219	374	5.93		
[illegible]	1	1	1.00		1475	253	5.83	-0.43	-1.26
[illegible]					1192	237	5.03		
[illegible]					1577	220	7.17		
[illegible]					1185	220	5.39		
[illegible]					916	137	6.69		
[illegible]					721	146	4.94		
[illegible]					586	123	4.76		



Delayed Days for Facility Reasons (Average Days) (OP-6B-1) (Parity)-- Dispatches Within MSAs

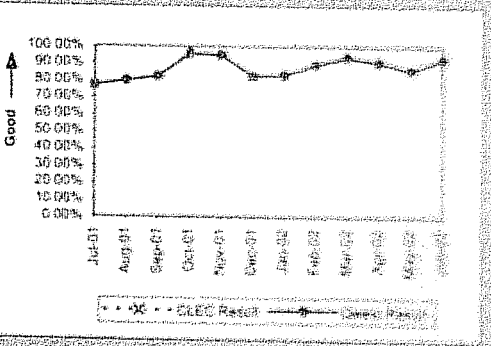
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]					7082	483	14.66		
[illegible]					46025	1956	23.53		
[illegible]					57393	2446	23.46		
[illegible]					11645	497	23.43		
[illegible]	1	1	1.00		2979	151	19.73	-0.9	-1.55
[illegible]					2304	107	21.53		
[illegible]					3104	70	44.34		
[illegible]					472	30	15.73		
[illegible]					780	25	31.20		
[illegible]					597	35	17.06		
[illegible]					268	16	16.75		
[illegible]					55	12	4.58		



Checklist #14 - Resale - Qwest DSL Installation

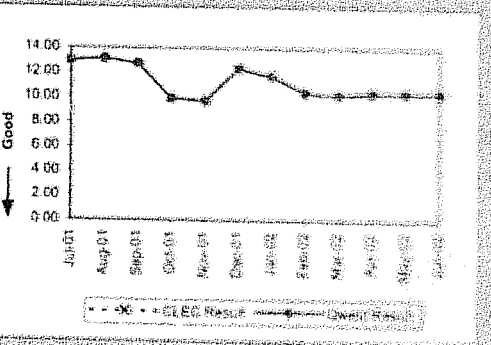
Installation Commitments Met (Percent) (OP-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					91	118	77.12%		
Aug-01					84	105	80.00%		
Sep-01					75	91	82.42%		
Oct-01					95	99	95.96%		
Nov-01					79	83	95.18%		
Dec-01					77	93	82.80%		
Jan-02					80	96	83.33%		
Feb-02					128	143	89.51%		
Mar-02					121	129	93.80%		
Apr-02					123	135	91.11%		
May-02					108	125	86.40%		
Jun-02					106	114	92.98%		



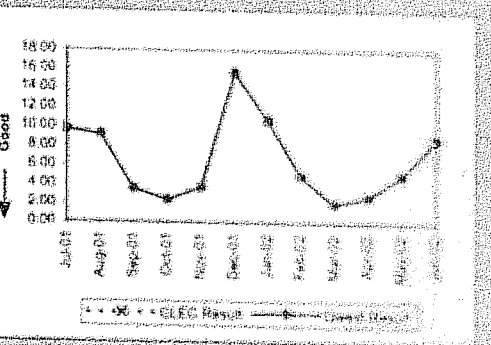
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					1570	121	12.98		
Aug-01					1418	108	13.13		
Sep-01					1186	93	12.75		
Oct-01					1003	101	9.93		
Nov-01					819	84	9.75		
Dec-01					1174	95	12.36		
Jan-02					1139	97	11.74		
Feb-02					1532	147	10.42		
Mar-02					1333	130	10.25		
Apr-02					1448	139	10.42		
May-02					1361	131	10.39		
Jun-02					1239	119	10.41		



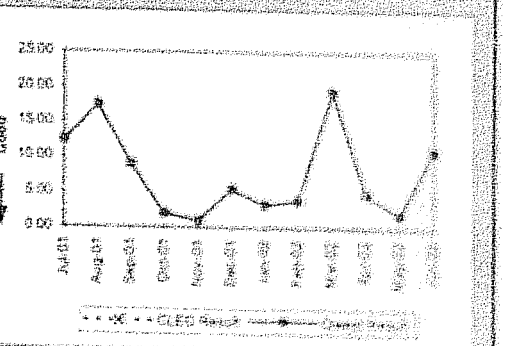
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					155	16	9.69		
Aug-01					176	19	9.26		
Sep-01					50	14	3.57		
Oct-01					12	5	2.40		
Nov-01					15	4	3.75		
Dec-01					235	15	15.67		
Jan-02					140	13	10.77		
Feb-02					59	12	4.92		
Mar-02					12	6	2.00		
Apr-02					25	9	2.78		
May-02					86	17	5.06		
Jun-02					62	7	8.86		



Delayed Days for Facility Reasons (Average Days) (OP-6B-2) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					172	14	12.29		
Aug-01					87	5	17.40		
Sep-01					36	4	9.00		
Oct-01					2	1	2.00		
Nov-01					1	1	1.00		
Dec-01					11	2	5.50		
Jan-02					10	3	3.33		
Feb-02					12	3	4.00		
Mar-02					39	2	19.50		
Apr-02					20	4	5.00		
May-02					2	1	2.00		
Jun-02					11	1	11.00		



CONTINUATION

[9]

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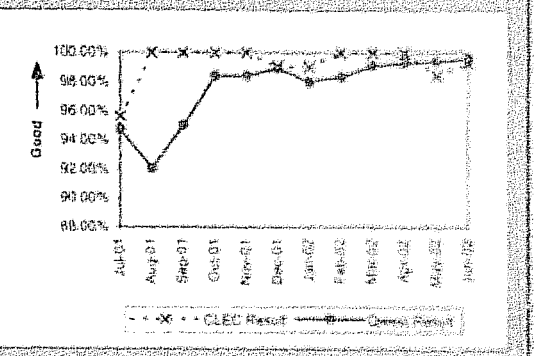
Checklist #14 - Resale - Qwest DSL Installation

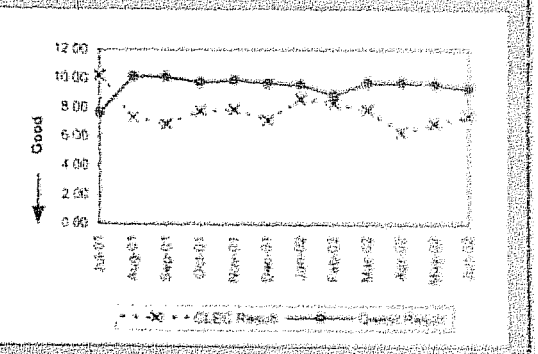
Installation Commitments Met (Percent) (OP-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	22	23	95.65%	20.39%	36691	38724	94.75%	-0.19	-1.12
Aug-01	21	21	100.00%	0.00%	20808	22593	92.10%	-1.34	-1.82
Sep-01	34	34	100.00%	0.00%	17473	18385	95.04%	-1.33	-1.81
Oct-01	99	99	100.00%	0.00%	31595	32096	98.44%	-1.25	-1.76
Nov-01	77	77	100.00%	0.00%	28258	28712	98.42%	-1.11	-1.68
Dec-01	108	109	99.08%	9.53%	34639	35012	98.93%	-0.15	-1.09
Jan-02	110	111	99.10%	9.45%	33091	33749	98.05%	-0.8	-1.49
Feb-02	111	111	100.00%	0.00%	30333	30834	98.38%	-1.35	-1.82
Mar-02	109	109	100.00%	0.00%	29828	30085	99.15%	-0.97	-1.59
Apr-02	106	106	100.00%	0.00%	32654	32879	99.32%	-0.85	-1.52
May-02	128	130	98.46%	12.31%	27762	27923	99.42%	1.25	-0.24
Jun-02	142	143	99.30%	8.33%	28752	28868	99.60%	0.58	-0.64



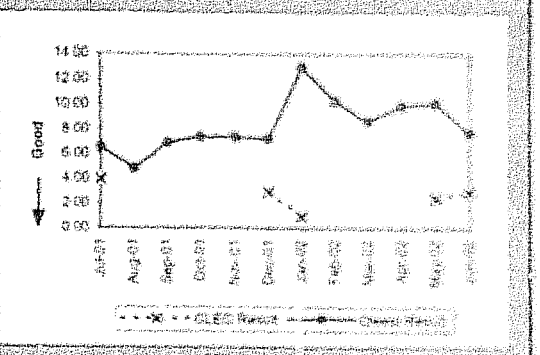
Installation Interval (Average Days) (OP-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	235	22	10.23	2.67	200531	26219	7.65	2.88	1.75
Aug-01	118	16	7.38	2.47	147196	14467	10.17	-3.63	-3.21
Sep-01	200	29	6.90	3.32	127857	12644	10.11	-5.52	-4.36
Oct-01	657	84	7.82	2.80	223877	22977	9.74	-8.36	-6.08
Nov-01	372	47	7.91	3.08	161855	16354	9.90	-5.43	-4.3
Dec-01	353	49	7.20	2.74	131770	13584	9.70	-6.38	-4.86
Jan-02	432	50	8.64	3.04	182231	19003	9.59	-2.36	-2.43
Feb-02	467	56	8.34	2.67	200178	22500	8.90	-1.41	-1.86
Mar-02	236	30	7.87	2.62	199392	20491	9.73	-3.75	-3.28
Apr-02	304	46	6.33	3.42	224484	23098	9.72	-13.03	-8.92
May-02	444	64	6.94	3.49	187688	19483	9.63	-9.04	-6.5
Jun-02	656	87	7.54	3.00	178455	19062	9.36	-8.53	-5.19



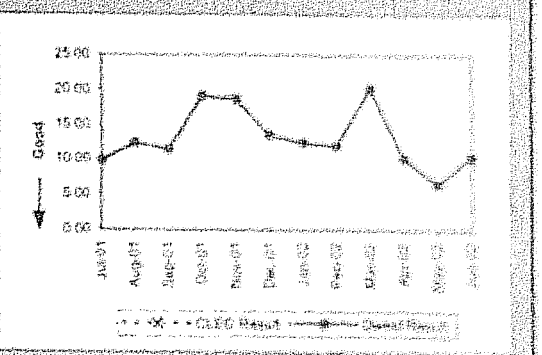
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-3) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	4	1	4.00		11988	1824	6.57	-0.29	-1.18
Aug-01					6141	1268	4.84		
Sep-01					5134	745	6.89		
Oct-01					3617	488	7.41		
Nov-01					3288	445	7.39		
Dec-01	3	1	3.00		2437	335	7.27	-0.34	-1.21
Jan-02	1	1	1.00		8030	619	12.97	-0.85	-1.54
Feb-02					4479	435	10.30		
Mar-02					2062	238	8.66		
Apr-02					1594	161	9.90		
May-02	5	2	2.50	0.71	1549	153	10.12	-0.5	-1.3
Jun-02	3	1	3.00		843	109	7.73	-0.28	-1.17



Delayed Days for Facility Reasons (Average Days) (OP-6B-3) (Parity)-- No Dispatches

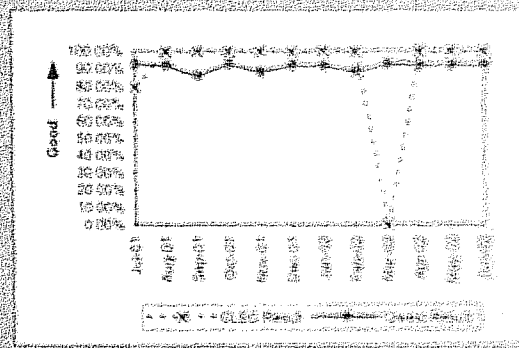
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					2306	234	9.85		
Aug-01					6513	529	12.31		
Sep-01					2090	183	11.42		
Oct-01					459	24	19.12		
Nov-01					579	31	18.68		
Dec-01					527	39	13.51		
Jan-02					472	38	12.42		
Feb-02					792	66	12.00		
Mar-02					468	23	20.35		
Apr-02					707	69	10.25		
May-02					46	7	6.57		
Jun-02					93	9	10.33		



Checklist #14 - Resale - Qwest DSL Installation

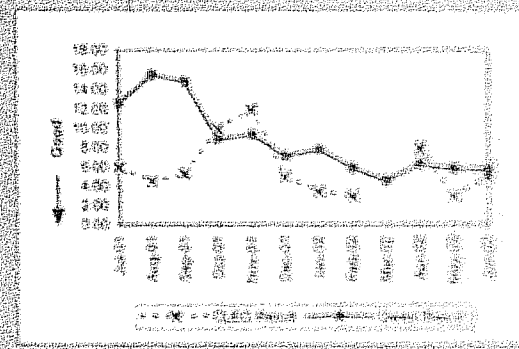
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	4	5	80.00%	40.00%	837	902	92.79%	0.91	-0.44
Aug-01	2	2	100.00%	0.00%	526	570	92.28%	-0.41	-1.25
Sep-01	3	3	100.00%	0.00%	292	338	86.39%	-0.68	-1.42
Oct-01	2	2	100.00%	0.00%	264	284	92.96%	-0.39	-1.24
Nov-01	1	1	100.00%	0.00%	224	253	88.54%	-0.36	-1.22
Dec-01	1	1	100.00%	0.00%	218	236	92.37%	-0.29	-1.17
Jan-02	2	2	100.00%	0.00%	244	265	92.08%	-0.41	-1.25
Feb-02	1	1	100.00%	0.00%	181	204	88.73%	-0.36	-1.22
Mar-02	0	1	0.00%	0.00%	210	226	92.92%	1.81	0.1
Apr-02	1	1	100.00%	0.00%	299	323	92.57%	-0.28	-1.17
May-02	3	3	100.00%	0.00%	287	311	92.28%	-0.5	-1.3
Jun-02	3	3	100.00%	0.00%	192	208	92.31%	-0.5	-1.3



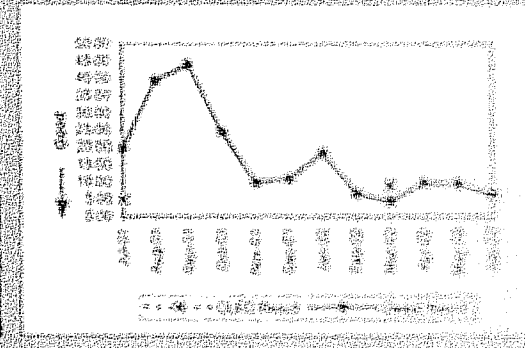
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	24	4	6.00	2.45	14754	1161	12.71	-0.93	-1.56
Aug-01	9	2	4.50	0.71	10147	656	15.47	-0.69	-1.42
Sep-01	16	3	5.33	0.58	5270	355	14.85	-0.61	-1.37
Oct-01	20	2	10.00	5.66	2700	303	8.91	1.19	0.09
Nov-01	12	1	12.00		2476	264	9.38	1.66	0.01
Dec-01	5	1	5.00		1706	239	7.14	-0.2	-1.19
Jan-02	7	2	3.50	0.71	2243	286	7.84	-0.48	-1.28
Feb-02	3	1	3.00		1174	198	5.93	-0.39	-1.23
Mar-02					1036	225	4.60		
Apr-02	8	1	8.00		2035	322	6.32	0.37	-0.77
May-02	6	2	3.00	2.83	1759	303	5.81	-0.54	-1.33
Jun-02	10	2	5.00	0.00	1161	200	5.80	-0.2	-1.12



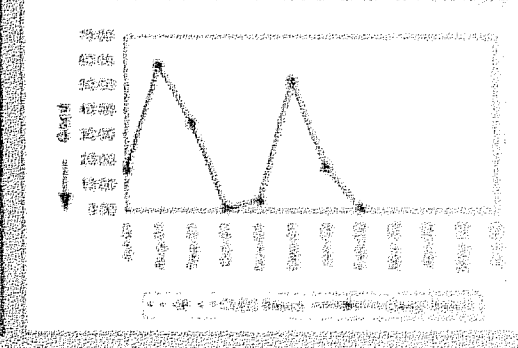
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	5	1	5.00		5623	286	19.66	-0.73	-1.45
Aug-01					5407	137	39.47		
Sep-01					2905	66	44.02		
Oct-01					1031	42	24.55		
Nov-01					524	53	9.89		
Dec-01					262	24	10.92		
Jan-02					571	31	18.42		
Feb-02					156	23	6.78		
Mar-02	9	1	9.00		80	18	4.44	1.13	-0.32
Apr-02					276	28	9.86		
May-02					257	27	9.52		
Jun-02					105	16	6.56		



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

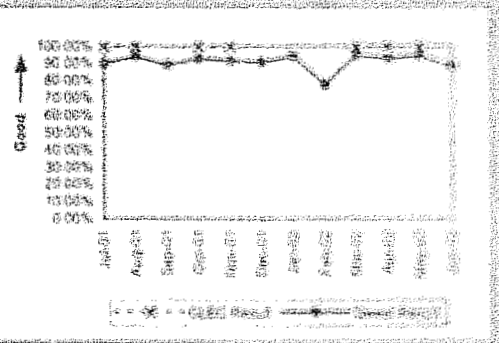
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01					342	21	16.29		
Aug-01					116	2	58.00		
Sep-01					70	2	35.00		
Oct-01					1	1	1.00		
Nov-01					4	1	4.00		
Dec-01					52	1	52.00		
Jan-02					52	3	17.33		
Feb-02					1	1	1.00		
Mar-02									
Apr-02									
May-02									
Jun-02									



Checklist #14 - Resale - Qwest DSL Installation

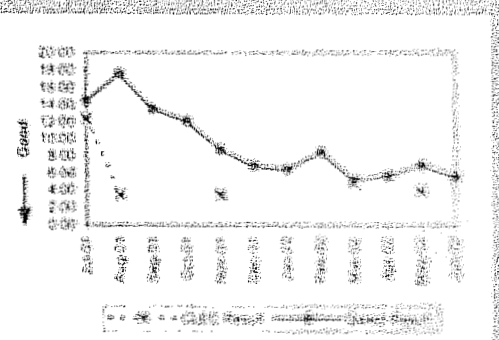
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	2	2	100.00%	0.00%	163	181	90.06%	-0.47	-1.28
Aug-01	2	2	100.00%	0.00%	113	120	94.17%	-0.35	-1.21
Sep-01					58	65	89.23%		
Oct-01	1	1	100.00%	0.00%	52	56	92.86%	-0.27	-1.17
Nov-01	2	2	100.00%	0.00%	54	59	91.53%	-0.42	-1.26
Dec-01					39	43	90.70%		
Jan-02					52	55	94.55%		
Feb-02					42	54	77.78%		
Mar-02	1	1	100.00%	0.00%	37	39	94.87%	-0.23	-1.14
Apr-02	1	1	100.00%	0.00%	67	72	93.06%	-0.27	-1.16
May-02	2	2	100.00%	0.00%	51	54	94.44%	-0.34	-1.2
Jun-02					31	35	88.57%		



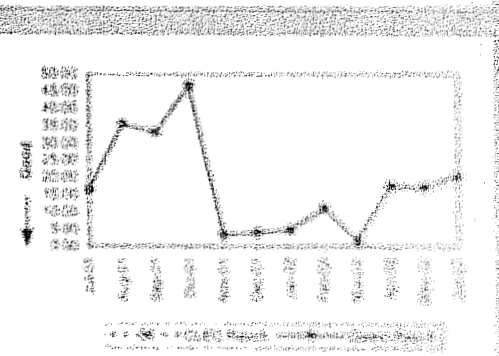
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	25	2	12.50	2.12	3347	230	14.55	-0.16	-1.1
Aug-01	7	2	3.50	0.71	2773	152	17.66	-0.93	-1.57
Sep-01					1001	74	13.53		
Oct-01					706	58	12.17		
Nov-01	7	2	3.50	3.54	472	54	8.74	-0.38	-1.21
Dec-01					297	42	6.83		
Jan-02					343	53	6.47		
Feb-02					443	52	8.52		
Mar-02	5	1	5.00		202	39	5.18	-0.04	-1.03
Apr-02					395	69	5.72		
May-02	4	1	4.00		363	52	6.98	-0.32	-1.16
Jun-02					186	33	5.64		



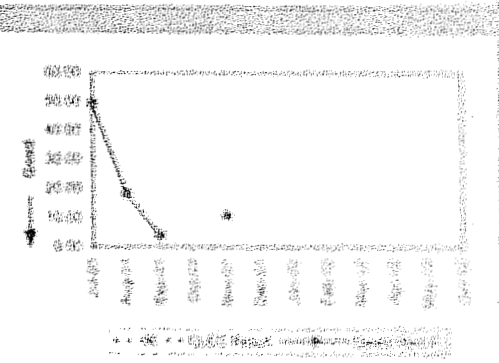
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01					1000	60	16.67		
Aug-01					1567	44	35.61		
Sep-01					565	17	33.24		
Oct-01					327	7	46.71		
Nov-01					21	6	3.50		
Dec-01					16	4	4.00		
Jan-02					20	4	5.00		
Feb-02					135	12	11.25		
Mar-02					4	2	2.00		
Apr-02					106	6	17.67		
May-02					69	4	17.25		
Jun-02					104	5	20.80		



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

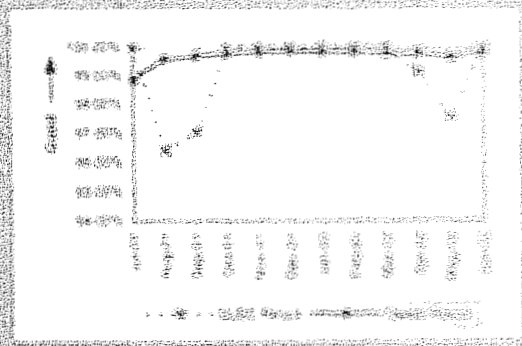
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01					297	6	49.50		
Aug-01					37	2	18.50		
Sep-01					4	1	4.00		
Oct-01									
Nov-01					22	2	11.00		
Dec-01									
Jan-02									
Feb-02									
Mar-02									
Apr-02									
May-02									
Jun-02									



Checklist #14 - Resale - Qwest DSL Installation

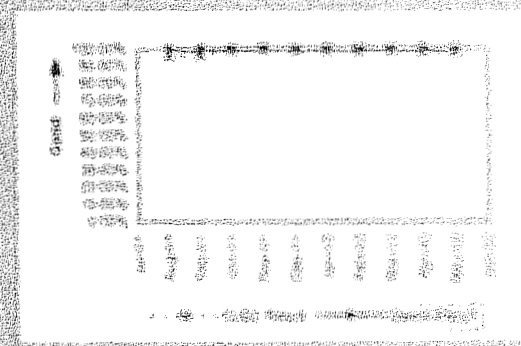
New Service Installation Quality (Percent) (OP-5) (Part) – Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	27	27	100.00%	0.00%	45533	47072	96.85%	-0.56	Y
Aug-01	27	28	96.43%	18.56%	32952	33117	99.50%	1.51	Y
Sep-01	33	34	97.06%	16.90%	30658	30781	99.60%	1.58	Y
Oct-01	76	76	100.00%	0.00%	35719	35902	99.49%	-0.42	Y
Nov-01	99	99	100.00%	0.00%	39795	39983	99.53%	-0.42	Y
Dec-01	101	101	100.00%	0.00%	40570	40671	99.75%	-0.39	Y
Jan-02	116	116	100.00%	0.00%	42524	42597	99.83%	-0.45	Y
Feb-02	116	116	100.00%	0.00%	39813	39872	99.85%	-0.43	Y
Mar-02	114	114	100.00%	0.00%	37452	37541	99.76%	-0.52	Y
Apr-02	112	113	99.12%	9.37%	38430	38493	99.76%	1.11	Y
May-02	121	124	97.58%	15.37%	37913	37948	99.64%	2.35	Y
Jun-02	114	144	100.00%	0.00%	34618	34673	99.87%	-0.31	Y



New Service Installation Quality (Percent) (OP-5) (Part) – Interval Zone One and Two

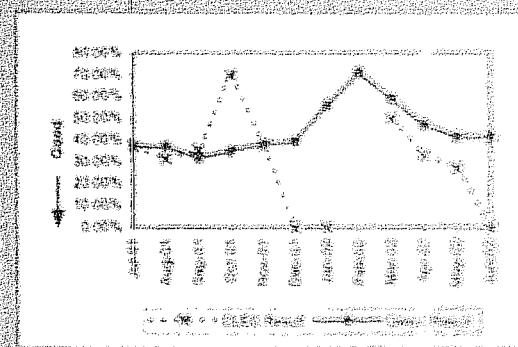
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01									
Aug-01	27	28	96.43%	18.56%	32952	33117	99.50%	1.51	Y
Sep-01	33	34	97.06%	16.90%	30658	30781	99.60%	1.58	Y
Oct-01	76	76	100.00%	0.00%	35719	35902	99.49%	-0.42	Y
Nov-01	99	99	100.00%	0.00%	39795	39983	99.53%	-0.42	Y
Dec-01	101	101	100.00%	0.00%	40570	40671	99.75%	-0.39	Y
Jan-02	116	116	100.00%	0.00%	42524	42597	99.83%	-0.45	Y
Feb-02	116	116	100.00%	0.00%	39813	39872	99.85%	-0.43	Y
Mar-02	114	114	100.00%	0.00%	37452	37541	99.76%	-0.52	Y
Apr-02	112	113	99.12%	9.37%	38430	38493	99.76%	1.11	Y
May-02	121	124	97.58%	15.37%	37913	37948	99.64%	2.35	Y
Jun-02	114	144	100.00%	0.00%	34618	34673	99.87%	-0.31	Y



Checklist #14 - Resale - Qwest DSL Repair

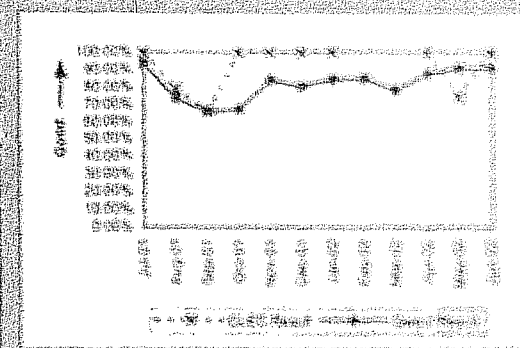
Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic) -- Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	6	16	37.50%	48.41%	2498	6728	37.13%	0.03	-0.07
Aug-01	11	35	31.43%	46.42%	3429	9260	37.03%	-0.68	-1.40
Sep-01	5	14	35.71%	47.92%	1706	5351	31.88%	0.32	-0.28
Oct-01	7	10	70.00%	45.83%	1992	5685	35.04%	2.17	0.32
Nov-01	6	16	37.50%	48.41%	1569	4107	38.20%	-0.06	-1.04
Dec-01	0	1	0.00%	0.00%	1622	4102	39.54%	-0.81	-1.49
Jan-02	0	3	0.00%	0.00%	3596	6433	55.90%	-1.95	-2.19
Feb-02					4407	6189	71.21%		
Mar-02	1	2	50.00%	50.00%	3335	5659	58.93%	-0.26	-1.15
Apr-02	2	6	33.33%	47.14%	2041	4337	47.06%	-0.67	-1.41
May-02	3	11	27.27%	44.54%	2144	5151	41.62%	-0.96	-1.59
Jun-02	0	2	0.00%	0.00%	1804	4345	41.52%	-1.19	-1.72



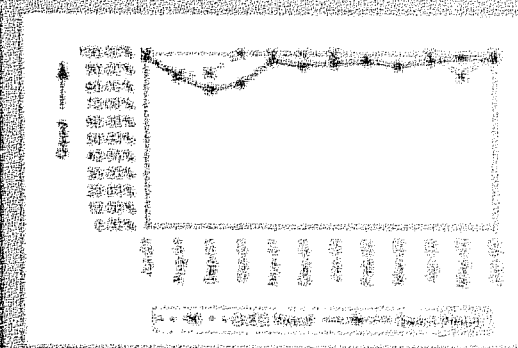
Out of Service Cleared within 24 hours (Percent) (MR-3D) (Parity) -- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	9	9	100.00%	0.00%	3349	3572	93.75%	-0.77	-1.63
Aug-01	19	24	79.17%	40.61%	3690	5607	73.75%	-0.61	-1.33
Sep-01	6	9	66.67%	47.14%	2112	3195	66.15%	-0.04	-0.92
Oct-01	3	3	100.00%	0.00%	2097	3129	67.02%	-1.21	-1.74
Nov-01	10	10	100.00%	0.00%	1797	2138	84.05%	-1.37	-1.56
Dec-01	1	1	100.00%	0.00%	1692	2101	80.53%	-0.49	-0.91
Jan-02	3	3	100.00%	0.00%	2033	2409	84.39%	-0.74	-1.43
Feb-02					1278	1503	85.03%		
Mar-02					1567	1994	78.59%		
Apr-02	4	4	100.00%	0.00%	1773	2019	87.82%	-0.74	-1.43
May-02	6	8	75.00%	43.30%	2320	2555	90.80%	1.31	-0.27
Jun-02	2	2	100.00%	0.00%	2092	2288	91.60%	-0.44	-0.85



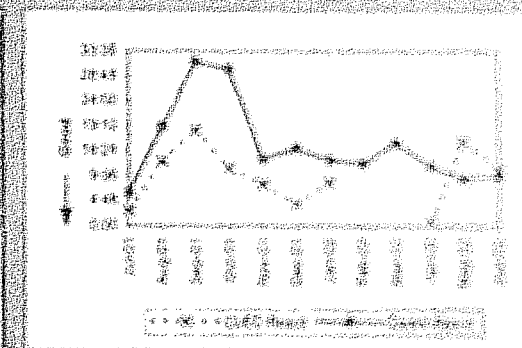
All Troubles Cleared within 48 hours (Percent) (MR-4D) (Parity) -- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	9	9	100.00%	0.00%	3489	3572	97.68%	-0.46	-1.23
Aug-01	21	24	87.50%	33.07%	4309	5607	86.06%	-0.2	-1.12
Sep-01	8	9	88.89%	31.43%	2537	3205	79.16%	-0.72	-1.44
Oct-01	3	3	100.00%	0.00%	2627	3189	82.41%	-0.79	-1.48
Nov-01	10	10	100.00%	0.00%	2074	2167	95.71%	-0.65	-1.41
Dec-01	1	1	100.00%	0.00%	1979	2128	93.00%	-0.27	-0.73
Jan-02	3	3	100.00%	0.00%	2295	2435	94.25%	-0.45	-1.08
Feb-02					1454	1516	95.91%		
Mar-02					1859	2065	90.02%		
Apr-02	4	4	100.00%	0.00%	1938	2023	95.80%	-0.42	-1.08
May-02	7	8	87.50%	33.07%	2495	2556	97.61%	1.31	-0.37
Jun-02	2	2	100.00%	0.00%	2233	2292	97.43%	-0.33	-1.01



Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity) -- Interval Zone One

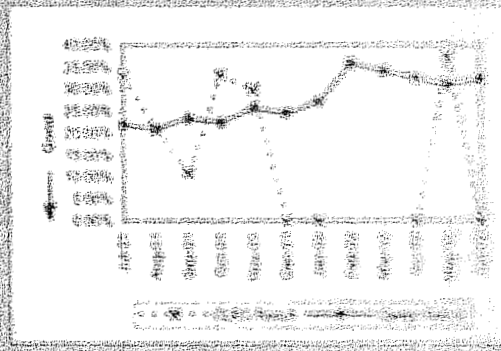
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	27:01	9	3:00	5:31	22866:01	3572	6:24	-0.69	-1.42
Aug-01	299:59	24	12:30	21:26	95574:34	5607	17:03	-0.94	-1.60
Sep-01	164:57	9	18:20	24:26	101056:09	3205	31:32	-0.74	-1.48
Oct-01	33:28	3	11:09	9:43	96178:58	3189	30:15	-0.64	-1.39
Nov-01	80:07	10	8:01	8:52	27832:37	2167	12:51	-0.8	-1.49
Dec-01	4:17	1	4:17		31761:54	2128	14:56	-0.45	-1.27
Jan-02	25:29	3	8:30	13:13	30656:09	2435	12:40	-0.32	-1.19
Feb-02					18272:36	1516	12:03		
Mar-02					31930:57	2065	15:28		
Apr-02	3:48	4	0:57	0:36	23525:46	2023	11:38	-1.05	-1.64
May-02	130:56	8	16:22	19:29	23277:18	2556	9:06	1.32	-0.26
Jun-02	21:57	2	10:58	7:25	22348:23	2292	9:45	0.4	-0.75



Checklist #14 - Resale - Qwest DSL Repair

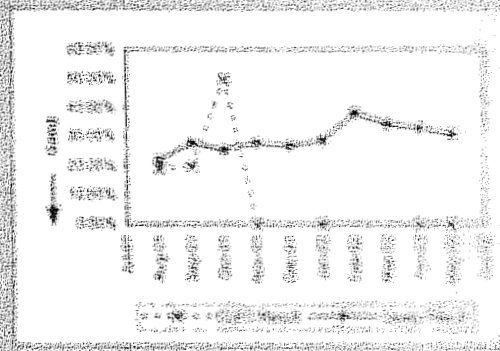
Repair Repeat Report Rate (Percent) (MR-7D) (Parity) -- Interval Zone One

Date	CLEC Num	CLEC Dend	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Rat	Mod Z Scr	Parity Scr
Jul-01	3	9	33.33%	47.14%	783	3572	21.92%	-0.8	-0.53
Aug-01	5	24	20.83%	40.61%	1052	5007	21.01%	-0.02	-0.01
Sep-01	1	9	11.11%	31.43%	750	3205	23.40%	-0.83	-0.53
Oct-01	1	3	33.33%	47.14%	715	3180	22.48%	0.43	0.24
Nov-01	3	10	30.00%	45.83%	556	2167	25.66%	0.34	0.16
Dec-01	0	1	0.00%	0.00%	525	2128	24.67%	-0.57	-1.35
Jan-02	0	3	0.00%	0.00%	663	2435	27.23%	-1.06	-1.64
Feb-02					543	1516	35.82%		
Mar-02					684	2005	34.11%		
Apr-02	0	4	0.00%	0.00%	656	2023	32.43%	-1.38	-1.64
May-02	3	8	37.50%	48.41%	793	2556	31.03%	0.4	0.25
Jun-02	0	2	0.00%	0.00%	741	2292	32.33%	-0.98	-1.09



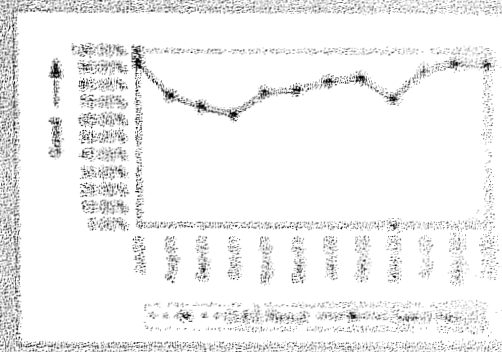
Repair Repeat Report Rate (Percent) (MR-7D*) (Parity) -- Interval Zone One

Date	CLEC Num	CLEC Dend	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Rat	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	4	21	19.05%	39.27%	820	3718	22.05%	-0.33	-0.2
Sep-01	1	5	20.00%	40.00%	519	1871	27.74%	-0.39	-0.23
Oct-01	1	2	50.00%	50.00%	471	1856	25.38%	0.64	0.3
Nov-01	0	6	0.00%	0.00%	403	1450	27.79%	-1.53	-1.02
Dec-01					368	1366	26.93%		
Jan-02	0	2	0.00%	0.00%	457	1590	28.74%	-0.9	-1.03
Feb-02					413	1083	38.13%		
Mar-02					488	1418	34.41%		
Apr-02	0	4	0.00%	0.00%	447	1360	32.87%	-1.1	-0.85
May-02	0	2	0.00%	0.00%	512	1667	30.71%	-0.91	-0.65
Jun-02									



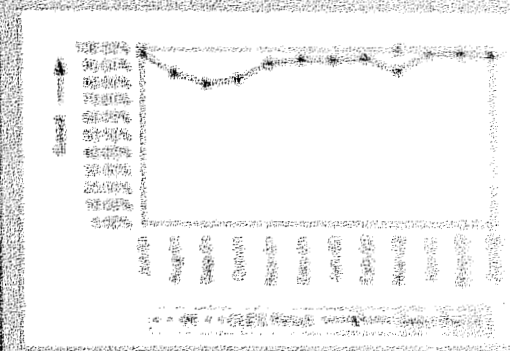
Out of Service Cleared within 24 hours (Percent) (MR-3E) (Parity) -- Interval Zone Two

Date	CLEC Num	CLEC Dend	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Rat	Mod Z Scr	Parity Scr
Jul-01	1	1	100.00%	0.00%	617	658	93.77%	-0.38	-0.58
Aug-01					669	824	73.91%		
Sep-01					298	440	67.73%		
Oct-01					322	509	63.26%		
Nov-01					277	364	76.10%		
Dec-01					271	349	77.65%		
Jan-02					329	400	82.25%		
Feb-02					224	266	84.21%		
Mar-02	0	1	0.00%	0.00%	285	319	72.73%	1.09	0.63
Apr-02					241	272	88.60%		
May-02					417	456	92.67%		
Jun-02					229	249	91.97%		



All Troubles Cleared within 48 hours (Percent) (MR-4E) (Parity) -- Interval Zone Two

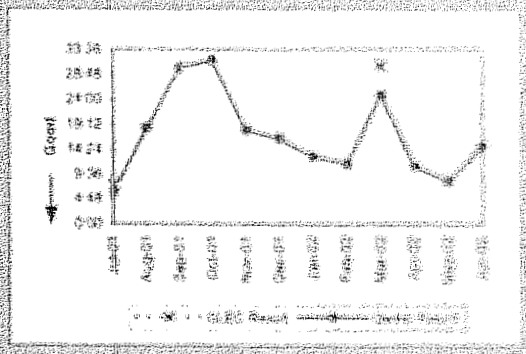
Date	CLEC Num	CLEC Dend	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Rat	Mod Z Scr	Parity Scr
Jul-01	1	1	100.00%	0.00%	642	658	97.57%	-0.18	-0.3
Aug-01					709	824	86.04%		
Sep-01					351	440	79.77%		
Oct-01					424	513	82.65%		
Nov-01					341	371	91.91%		
Dec-01					331	352	94.03%		
Jan-02					377	402	93.78%		
Feb-02					253	266	95.11%		
Mar-02	1	1	100.00%	0.00%	278	319	87.15%	-0.28	-0.23
Apr-02					266	273	97.44%		
May-02					441	451	97.78%		
Jun-02					240	249	96.39%		



Checklist #14 - Resale - Qwest DSL Repair

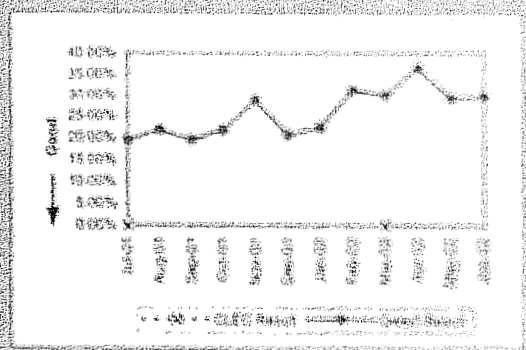
Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	7:44	1	7:44		4123:13	658	6:16	1.53	-0.07
Aug-01					15226:27	824	18:29		
Sep-01					13230:33	440	30:04		
Oct-01					16161:33	513	31:30		
Nov-01					6709:20	371	18:05		
Dec-01					5820:23	352	16:32		
Jan-02					5278:36	402	13:08		
Feb-02					3127:58	266	11:46		
Mar-02	30:32	1	30:32		7933:22	319	24:52	0.85	-0.48
Apr-02					3086:51	273	11:18		
May-02					3794:22	451	8:25		
Jun-02					3766:41	249	15:08		



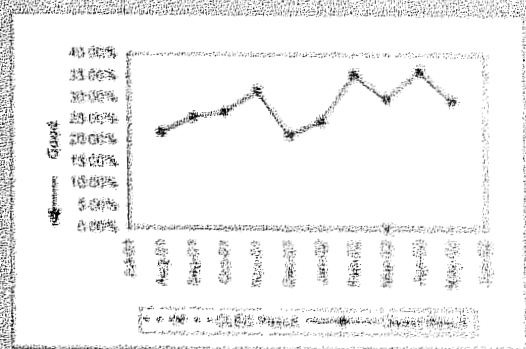
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	0	1	0.00%	0.00%	128	658	19.45%	-0.49	-1.3
Aug-01					180	824	21.84%		
Sep-01					86	440	19.55%		
Oct-01					112	513	21.83%		
Nov-01					107	371	28.84%		
Dec-01					73	352	20.74%		
Jan-02					90	402	22.39%		
Feb-02					83	266	31.20%		
Mar-02	0	1	0.00%	0.00%	96	319	30.09%	-0.56	-1.4
Apr-02					100	273	36.63%		
May-02					132	451	29.27%		
Jun-02					74	249	29.72%		



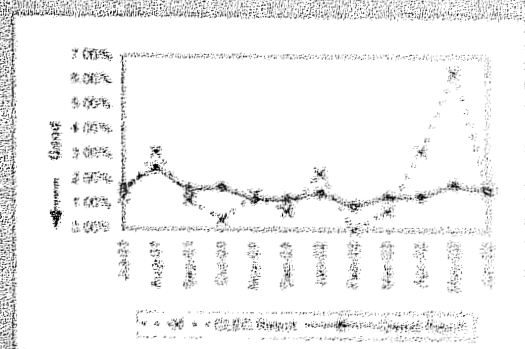
Repair Repeat Report Rate (Percent) (MR-7E') (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					125	566	22.08%		
Sep-01					63	246	25.61%		
Oct-01					81	302	26.82%		
Nov-01					69	217	31.80%		
Dec-01					51	237	21.52%		
Jan-02					61	247	24.70%		
Feb-02					65	183	35.52%		
Mar-02	0	1	0.00%	0.00%	66	220	30.00%	-0.65	-1.4
Apr-02					65	179	36.31%		
May-02					84	284	29.58%		
Jun-02									



Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

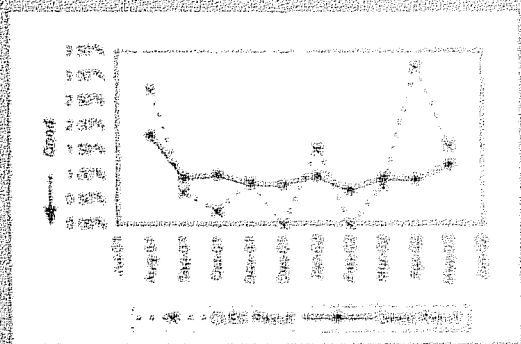
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	10	777	1.29%	11.27%	4230	252102	1.68%	-0.85	-1.51
Aug-01	24	771	3.11%	17.37%	5831	238364	2.45%	1.2	-0.27
Sep-01	9	757	1.19%	10.84%	3545	227625	1.60%	-0.9	-1.56
Oct-01	3	736	0.41%	6.37%	3693	217706	1.70%	-2.7	-2.64
Nov-01	10	710	1.41%	11.78%	2538	208053	1.22%	0.46	-0.72
Dec-01	1	129	0.78%	8.77%	2480	200987	1.23%	-0.47	-1.23
Jan-02	3	132	2.27%	14.90%	2637	191123	1.48%	0.78	-0.54
Feb-02	0	129	0.00%	0.00%	1782	183565	0.97%	-1.12	-1.68
Mar-02	1	128	0.78%	8.80%	2324	177040	1.31%	-0.53	-1.32
Apr-02	4	126	3.17%	17.53%	2296	170937	1.34%	1.52	-0.05
May-02	8	126	6.35%	24.38%	3007	164670	1.83%	2.99	0.82
Jun-02	2	124	1.61%	12.60%	2541	159033	1.60%	0.11	-0.93



Checklist #14 - Resale - Qwest DSL Repair

Trouble Rate (Percent) (MR-8*) (Parity)-- Interval Zone One and Two

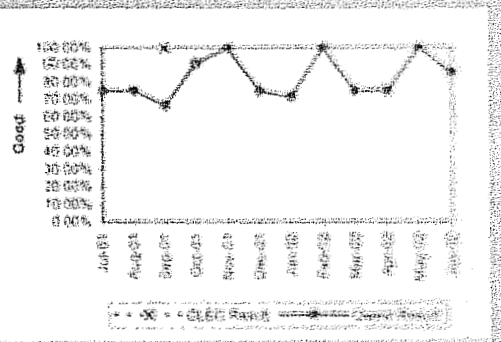
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Sta
Jul-01									
Aug-01	21	771	2 72%	16 28%	4284	238364	1 80%	1 93	0 18
Sep-01	5	757	0 66%	8 10%	2117	227625	0 93%	-0 77	1 97
Oct-01	2	736	0 27%	5 21%	2158	217738	0 99%	-1 97	-1
Nov-01	6	710	0 85%	9 15%	1667	208053	0 80%	0 13	-0 92
Dec-01	0	129	0 00%	0 00%	1603	200987	0 80%	-1 62	-1 62
Jan-02	2	132	1 52%	12 22%	1837	191123	0 96%	0 68	-0 55
Feb-02	0	129	0 00%	0 00%	1266	183565	0 69%	-0 95	-1 58
Mar-02	1	128	0 78%	8 80%	1638	177040	0 93%	-0 11	-1
Apr-02	4	126	3 17%	17 53%	1539	170937	0 90%	2 13	0 3
May-02	2	126	1 59%	12 50%	1951	164670	1 18%	0 48	-0 71
Jun-02									



Checklist #14 - Resale - Primary ISDN Installation

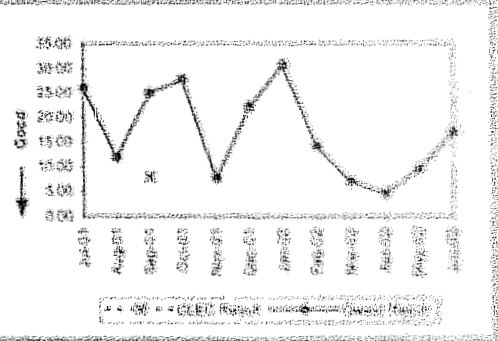
Installation Commitments Met (Percent) (OP-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					6	8	75.00%		
Aug-01					3	4	75.00%		
Sep-01	1	1	100.00%	0.00%	6	9	66.67%	-0.67	-1.41
Oct-01					10	11	90.91%		
Nov-01					5	5	100.00%		
Dec-01					3	4	75.00%		
Jan-02					5	7	71.43%		
Feb-02					7	7	100.00%		
Mar-02					6	8	75.00%		
Apr-02					3	4	75.00%		
May-02					5	5	100.00%		
Jun-02					12	14	85.71%		



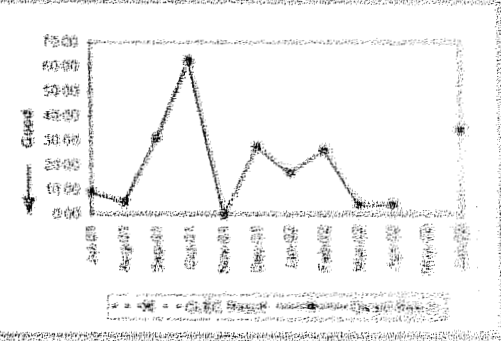
Installation Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					313	12	26.08		
Aug-01					96	8	12.00		
Sep-01	8	1	8.00		299	12	24.92	-0.56	-1.34
Oct-01					444	16	27.75		
Nov-01					46	6	7.67		
Dec-01					155	7	22.14		
Jan-02					399	13	30.69		
Feb-02					156	11	14.18		
Mar-02					56	8	7.00		
Apr-02					23	5	4.60		
May-02					95	10	9.50		
Jun-02					321	19	16.89		



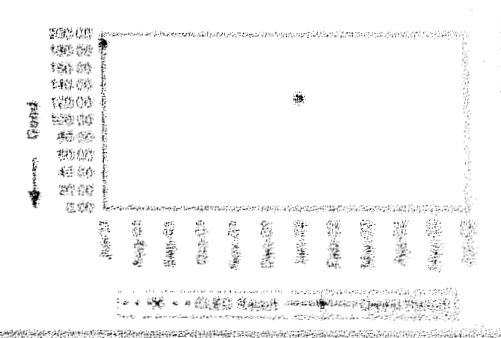
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-1) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					27	3	9.00		
Aug-01					5	1	5.00		
Sep-01					187	6	31.17		
Oct-01					312	5	62.40		
Nov-01					0	1	0.00		
Dec-01					110	4	27.50		
Jan-02					104	6	17.33		
Feb-02					79	3	26.33		
Mar-02					8	2	4.00		
Apr-02					4	1	4.00		
May-02									
Jun-02					207	6	34.50		



Delayed Days for Facility Reasons (Average Days) (OP-6B-1) (Parity)-- Dispatches Within MSAs

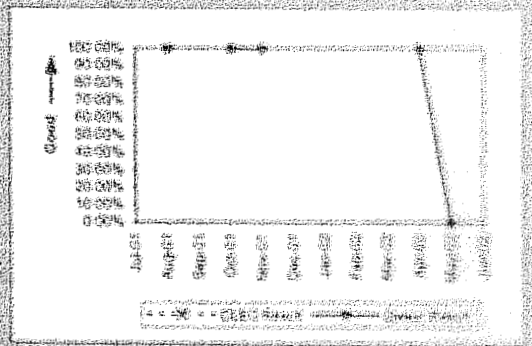
Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					189	1	189.00		
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01									
Jan-02					126	1	126.00		
Feb-02									
Mar-02									
Apr-02									
May-02									
Jun-02									



Checklist #14 - Resale - Primary ISDN Installation

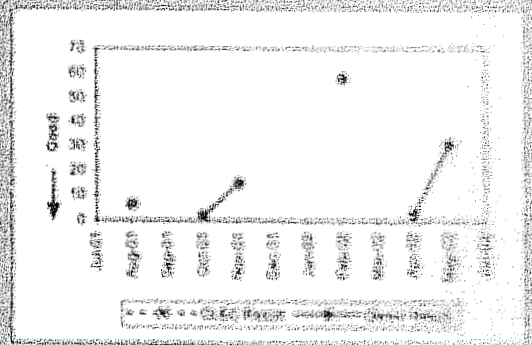
Installation Commitments Met (Percent) (OP-3B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					1	1	100.00%		
Sep-01									
Oct-01					1	1	100.00%		
Nov-01					5	5	100.00%		
Dec-01									
Jan-02									
Feb-02									
Mar-02									
Apr-02					1	1	100.00%		
May-02					0	2	0.00%		
Jun-02									



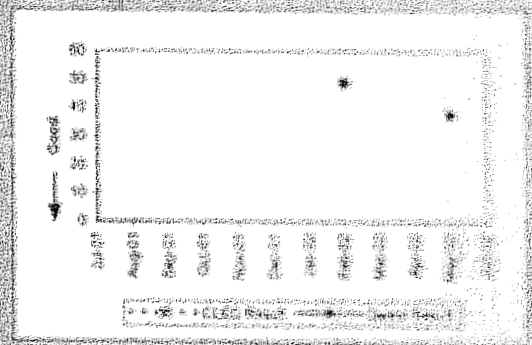
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					13	2	6.50		
Sep-01									
Oct-01					2	1	2.00		
Nov-01					75	5	15.00		
Dec-01									
Jan-02									
Feb-02					58	1	58.00		
Mar-02									
Apr-02					3	1	3.00		
May-02					123	4	30.75		
Jun-02									



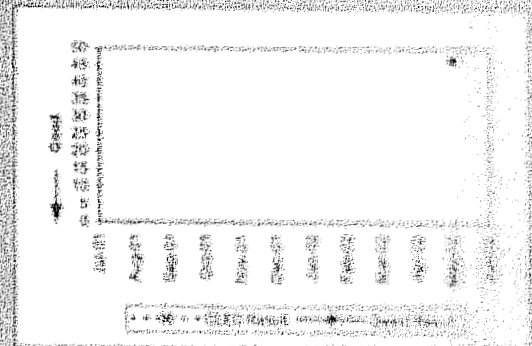
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-2) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01									
Jan-02									
Feb-02					49	1	49.00		
Mar-02									
Apr-02									
May-02					38	1	38.00		
Jun-02									



Delayed Days for Facility Reasons (Average Days) (OP-6B-2) (Parity)-- Dispatches Outside MSAs

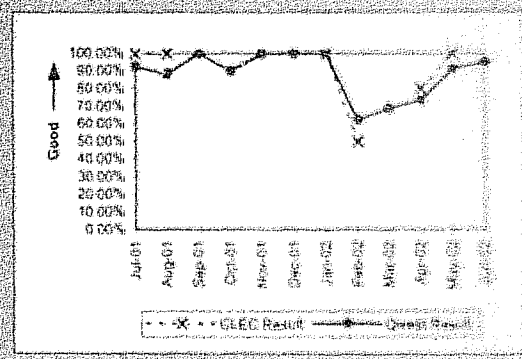
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01									
Dec-01									
Jan-02									
Feb-02									
Mar-02									
Apr-02									
May-02					47	1	47.00		
Jun-02									



Checklist #14 - Resale - Primary ISDN Installation

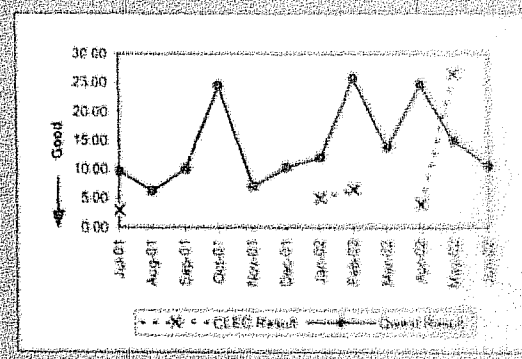
Installation Commitments Met (Percent) (OP-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	2	2	100.00%	0.00%	61	66	92.42%	-0.4	-1.24
Aug-01	2	2	100.00%	0.00%	15	17	88.24%	-0.49	-1.3
Sep-01					12	12	100.00%		
Oct-01					9	10	90.00%		
Nov-01					6	6	100.00%		
Dec-01					14	14	100.00%		
Jan-02	1	1	100.00%	0.00%	31	31	100.00%	N/A	N/A
Feb-02	1	2	50.00%	50.00%	5	8	62.50%	0.14	-0.92
Mar-02					11	16	68.75%		
Apr-02	4	5	80.00%	40.00%	11	15	73.33%	-0.29	-1.18
May-02	1	1	100.00%	0.00%	21	23	91.30%	-0.3	-1.18
Jun-02					20	21	95.24%		



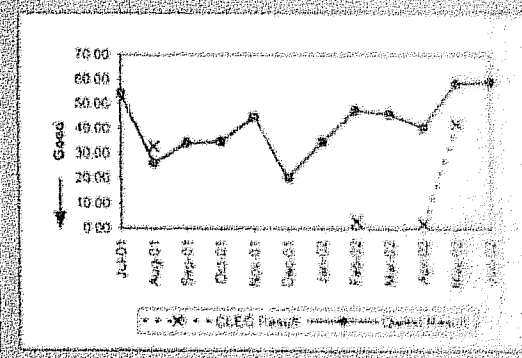
Installation Interval (Average Days) (OP-4C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	3	1	3.00		680	70	9.71	-0.34	-1.21
Aug-01					107	17	6.29		
Sep-01					191	19	10.05		
Oct-01					369	15	24.60		
Nov-01					70	10	7.00		
Dec-01					206	20	10.30		
Jan-02	5	1	5.00		588	49	12.00	-0.38	-1.23
Feb-02	13	2	6.50	3.54	489	19	25.74	-0.98	-1.59
Mar-02					360	26	13.85		
Apr-02	20	5	4.00	2.92	1354	55	24.62	-1.32	-1.8
May-02	53	2	26.50	30.41	449	30	14.97	1.05	-0.36
Jun-02					318	30	10.60		



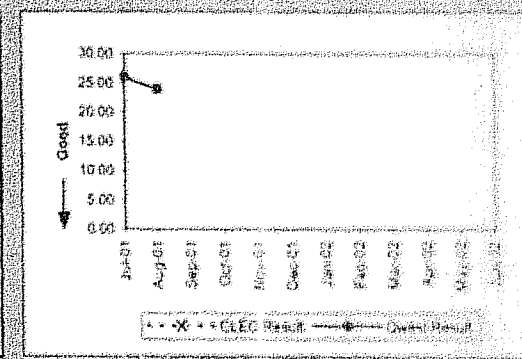
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-3) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					380	7	54.29		
Aug-01	33	1	33.00		105	4	26.25	0.74	-0.55
Sep-01					137	4	34.25		
Oct-01					314	9	34.89		
Nov-01					402	9	44.67		
Dec-01					122	6	20.33		
Jan-02					522	15	34.80		
Feb-02	3	1	3.00		567	12	47.25	-1.47	-1.89
Mar-02					1055	23	45.87		
Apr-02	2	1	2.00		1130	28	40.36	-1.06	-1.64
May-02	42	1	42.00		1986	34	58.41	-0.77	-1.47
Jun-02					1828	31	58.97		



Delayed Days for Facility Reasons (Average Days) (OP-6B-3) (Parity)-- No Dispatches

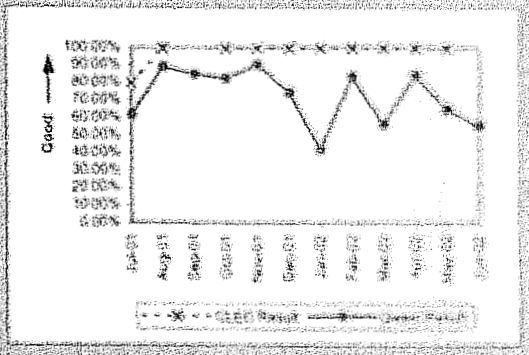
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					104	4	26.00		
Aug-01					24	1	24.00		
Sep-01									
Oct-01									
Nov-01									
Dec-01									
Jan-02									
Feb-02									
Mar-02									
Apr-02									
May-02									
Jun-02									



Checklist #14 - Resale - Primary ISDN Installation

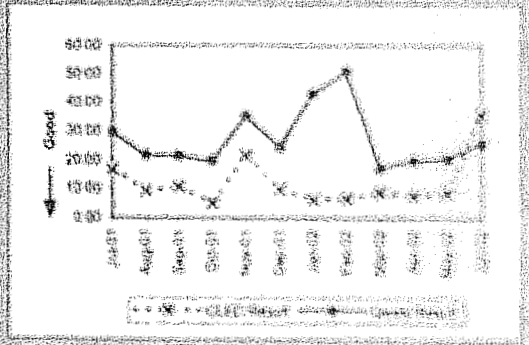
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	4	5	80.00%	40.00%	79	128	61.72%	-0.83	-1.5
Aug-01	4	4	100.00%	0.00%	205	230	89.13%	-0.69	-1.42
Sep-01					96	113	84.96%		
Oct-01	3	3	100.00%	0.00%	131	159	82.39%	-0.79	-1.48
Nov-01	2	2	100.00%	0.00%	184	204	90.20%	-0.46	-1.28
Dec-01	1	1	100.00%	0.00%	113	152	74.34%	-0.59	-1.36
Jan-02	3	3	100.00%	0.00%	222	527	42.13%	-2.02	-2.23
Feb-02	2	2	100.00%	0.00%	381	457	83.37%	-0.63	-1.38
Mar-02	1	1	100.00%	0.00%	160	283	56.54%	-0.88	-1.53
Apr-02	7	7	100.00%	0.00%	284	338	84.02%	-1.14	-1.69
May-02	8	8	100.00%	0.00%	196	303	64.69%	-2.06	-2.25
Jun-02					222	398	55.78%		



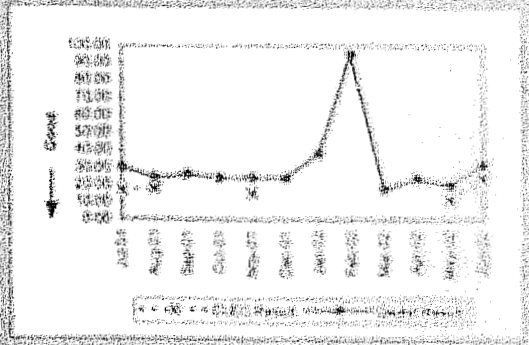
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	101	6	16.83	16.20	14641	495	29.58	-0.78	-1.47
Aug-01	38	4	9.50	3.87	11968	551	21.72	-0.93	-1.57
Sep-01	22	2	11.00	2.83	7308	340	21.47	-0.73	-1.44
Oct-01	16	3	5.33	2.52	9306	467	19.93	-1.28	-1.78
Nov-01	65	3	21.67	22.12	27582	781	35.32	-0.45	-1.27
Dec-01	60	6	10.00	2.45	10509	426	24.67	-1.65	-1.96
Jan-02	13	2	6.50	2.12	42572	990	43.00	-1.01	-1.61
Feb-02	14	2	7.00	1.41	28803	565	50.98	-0.73	-1.44
Mar-02	9	1	9.00		11237	648	17.34	-0.54	-1.31
Apr-02	39	5	7.80	3.03	13607	681	19.98	-1.09	-1.65
May-02	79	9	8.78	3.93	14290	691	20.68	-1.18	-1.72
Jun-02	36	1	36.00		16505	636	25.87	0.31	-0.51



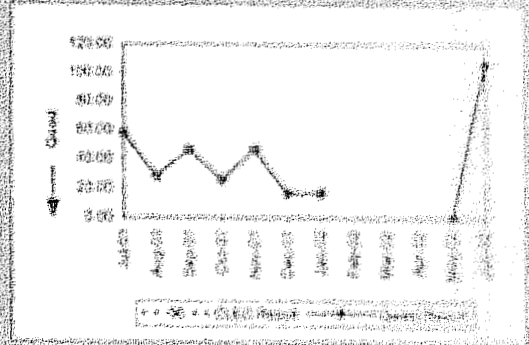
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01	87	5	17.40	14.98	7148	235	30.42	-0.82	-1.5
Aug-01	18	1	18.00		4341	177	24.53	-0.7	-1.42
Sep-01					3662	138	26.54		
Oct-01					5206	211	24.67		
Nov-01	31	2	15.50	21.92	14651	599	24.46	-0.3	-1.18
Dec-01					4074	166	24.54		
Jan-02					19708	507	38.87		
Feb-02					19901	209	95.22		
Mar-02					3755	208	18.05		
Apr-02					3922	163	24.06		
May-02	12	1	12.00		3354	164	20.45	-0.43	-1.26
Jun-02	25	1	25.00		8743	270	32.38	-0.24	-1.15



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

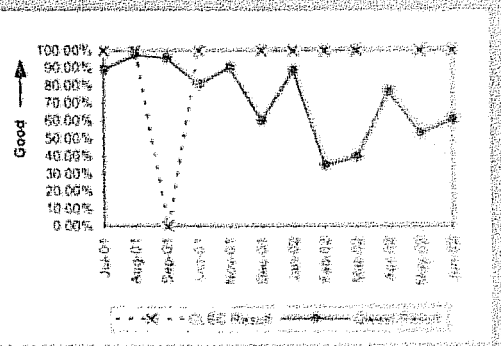
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
Jul-01					2020	35	57.71		
Aug-01					57	2	28.50		
Sep-01					417	9	46.33		
Oct-01					78	3	26.00		
Nov-01					465	10	46.50		
Dec-01					101	6	16.83		
Jan-02					134	8	16.75		
Feb-02									
Mar-02									
Apr-02									
May-02					1	1	1.00		
Jun-02					848	8	106.00		



Checklist #14 - Resale - Primary ISDN Installation

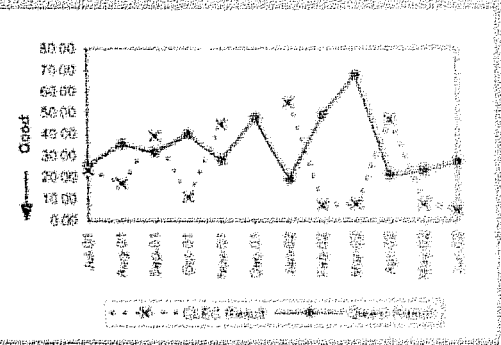
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	4	4	100.00%	0.00%	90	101	89.11%	-0.69	-1.42
Aug-01	4	4	100.00%	0.00%	246	252	97.62%	-0.31	-1.19
Sep-01	0	1	0.00%	0.00%	114	119	95.80%	2	0.22
Oct-01	5	5	100.00%	0.00%	72	89	80.90%	-1.06	-1.64
Nov-01					92	102	90.20%		
Dec-01	2	2	100.00%	0.00%	76	126	60.32%	-1.14	-1.69
Jan-02	3	3	100.00%	0.00%	86	97	88.66%	-0.61	-1.37
Feb-02	3	3	100.00%	0.00%	112	321	34.89%	-2.36	-2.43
Mar-02	3	3	100.00%	0.00%	78	197	39.59%	-2.12	-2.29
Apr-02					123	161	76.40%		
May-02	9	9	100.00%	0.00%	151	285	52.98%	-2.78	-2.69
Jun-02	4	4	100.00%	0.00%	349	575	60.70%	-1.6	-1.98



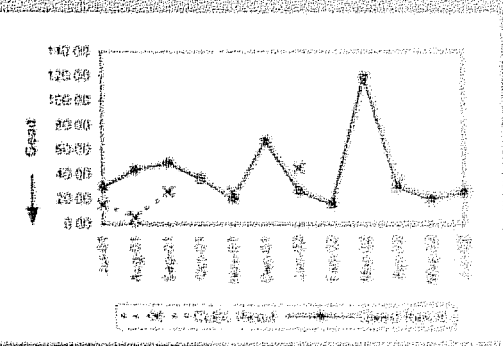
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	47	2	23.50	21.92	14070	546	25.77	-0.11	-1.06
Aug-01	103	6	17.17	9.00	26297	744	35.35	-1.23	-1.75
Sep-01	79	2	39.50	3.54	10325	325	31.77	2.17	0.32
Oct-01	66	6	11.00	4.00	15504	387	40.06	-1.82	-2.11
Nov-01	45	1	45.00		7741	275	28.15	2.75	0.67
Dec-01					11863	249	47.64		
Jan-02	329	6	54.83	50.62	6033	314	19.21	2.12	0.29
Feb-02	22	3	7.33	3.21	23101	472	48.94	-1.58	-1.96
Mar-02	32	4	8.00	1.41	27847	412	67.59	-1.06	-1.64
Apr-02	94	2	47.00	0.00	7489	357	20.98	1.6	-0.03
May-02	63	8	7.88	2.53	11469	496	23.12	-1.69	-2.03
Jun-02	15	3	5.00	2.65	20539	754	27.24	-1.13	-1.69



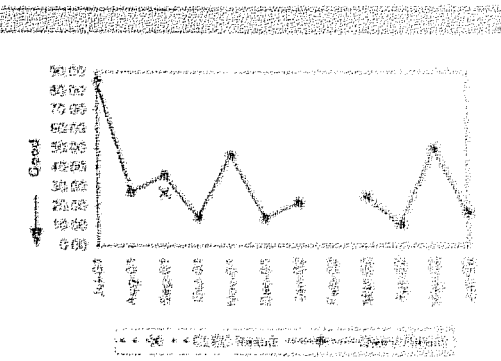
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	16	1	16.00		6686	224	29.85	-0.57	-1.35
Aug-01	23	4	5.75	3.30	12200	278	43.88	-2.81	-2.71
Sep-01	79	3	26.33	6.03	5919	120	49.32	-0.69	-1.54
Oct-01					8647	235	36.80		
Nov-01	52	2	26.00	4.24	4044	194	20.85	2.14	0.3
Dec-01					6591	98	67.26		
Jan-02	138	3	46.00	0.00	3077	114	26.99	1.36	-0.12
Feb-02					4533	271	16.73		
Mar-02					20952	176	119.05		
Apr-02	68	2	34.00	0.00	3879	129	30.07	0.56	-0.66
May-02					4841	236	20.51		
Jun-02					8790	335	26.24		



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

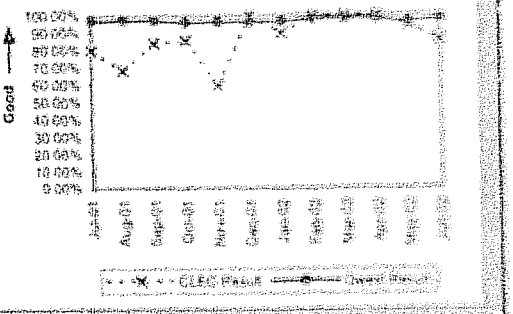
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					85	1	85.00		
Aug-01					55	2	27.50		
Sep-01	27	1	27.00		144	4	36.00	-0.32	-1.2
Oct-01					159	11	14.45		
Nov-01					232	5	46.40		
Dec-01					98	7	14.00		
Jan-02					66	3	22.00		
Feb-02									
Mar-02					25	1	25.00		
Apr-02					11	1	11.00		
May-02					50	1	50.00		
Jun-02					51	3	17.00		



Checklist #14 - Resale - Primary ISDN Installation

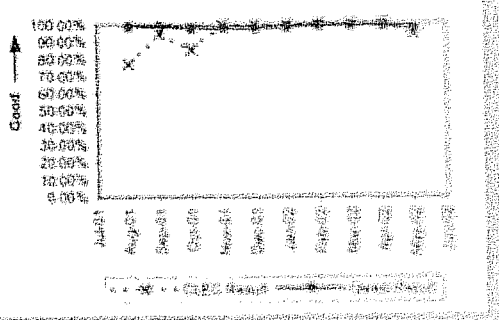
New Service Installation Quality (Percent) (OP-5) (Parity)– Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	20	25	80.00%	40.00%	1585	1636	96.88%	3.26	1
[illegible]	15	22	68.18%	46.58%	1314	1350	97.33%	4.8	1.92
[illegible]	16	19	84.21%	36.46%	1109	1140	97.28%	2.42	0.47
[illegible]	12	14	85.71%	34.99%	846	882	95.92%	1.53	-0.07
[illegible]	6	10	60.00%	48.99%	1001	1038	96.44%	3.63	1.21
[illegible]	8	8	100.00%	0.00%	885	918	96.41%	-0.54	-1.33
[illegible]	9	10	90.00%	30.00%	1038	1075	96.56%	0.94	-0.43
[illegible]	9	9	100.00%	0.00%	1330	1354	98.23%	-0.4	-1.24
[illegible]	6	6	100.00%	0.00%	1237	1256	98.49%	-0.3	-1.18
[illegible]	10	10	100.00%	0.00%	1215	1240	97.98%	-0.45	-1.27
[illegible]	18	19	94.74%	22.33%	1260	1311	96.34%	0.41	-0.75
[illegible]	12	14	85.71%	34.99%	1560	1593	97.93%	2.11	0.28



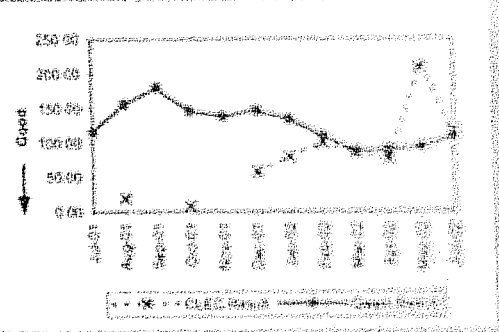
New Service Installation Quality (Percent) (OP-5*) (Parity)– Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]									
Aug-01	17	22	77.27%	41.91%	1333	1350	98.74%	4.42	1.69
Sep-01	18	19	94.74%	22.33%	1125	1140	98.68%	1.13	-0.31
Oct-01	12	14	85.71%	34.99%	864	882	97.96%	2.11	0.28
Nov-01	10	10	100.00%	0.00%	1018	1038	98.07%	-0.44	-1.27
Dec-01	8	8	100.00%	0.00%	898	918	97.82%	-0.42	-1.26
Jan-02	10	10	100.00%	0.00%	1058	1075	98.42%	-0.4	-1.24
Feb-02	9	9	100.00%	0.00%	1343	1354	99.19%	-0.27	-1.16
Mar-02	6	6	100.00%	0.00%	1245	1256	99.12%	-0.23	-1.14
Apr-02	10	10	100.00%	0.00%	1228	1240	99.03%	-0.31	-1.19
May-02	18	19	94.74%	22.33%	1279	1311	97.56%	0.73	-0.55
Jun-02									



Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

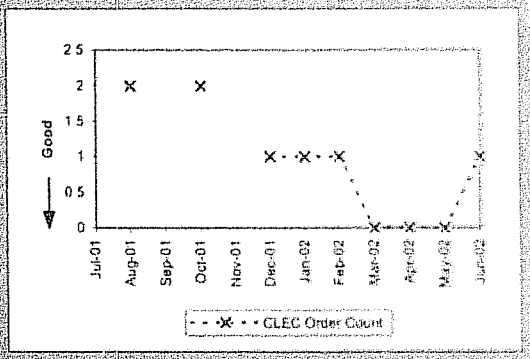
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]					185838	1631	116.39		
Aug-01	39	2	19.50	3.54	227814	1457	156.36	-2.33	-2.41
Sep-01					230859	1284	179.80		
Oct-01	16	2	8.00	5.66	105822	721	146.77	-2.04	-2.24
Nov-01					107549	780	137.88		
Dec-01	117	2	58.50	62.93	89678	609	147.25	-1.08	-1.66
Jan-02	161	2	80.50	62.93	96485	718	134.38	-0.6	-1.36
Feb-02	201	2	100.50	62.93	103397	937	110.35	-0.11	-1.07
Mar-02	173	2	86.50	112.43	98231	1127	87.16	-0.01	-1.01
Apr-02	233	3	77.67	95.77	123366	1370	90.05	-0.21	-1.03
May-02	210	1	210.00		151686	1617	93.81	0.85	-0.49
Jun-02	237	2	118.50	157.68	140814	1288	109.33	0.25	-0.85



Checklist #14 - Resale - Primary ISDN Installation

Count of Pending Orders Delayed for Facilities Reasons ISDN Primary (OP-15B) (Diagnostic)

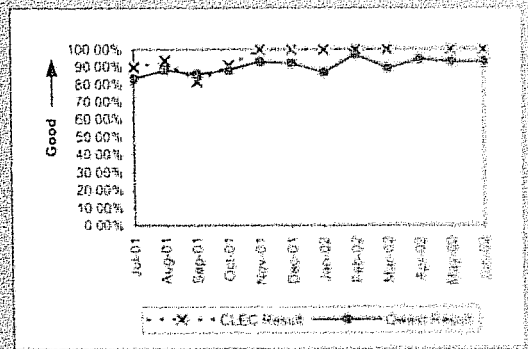
Date	CLEC Order Count
Jul-01	2
Aug-01	2
Sep-01	1
Oct-01	1
Nov-01	1
Dec-01	0
Jan-02	0
Feb-02	0
Mar-02	1
Apr-02	
May-02	
Jun-02	



Checklist #14 - Resale - Primary ISDN Repair

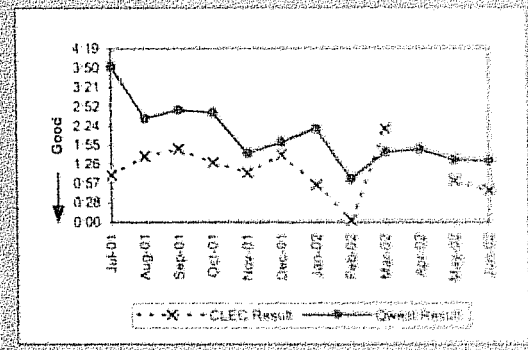
All Troubles Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	9	10	90.00%	30.00%	164	197	83.25%	-0.56	-1.34
[illegible]	15	16	93.75%	24.21%	143	162	88.27%	-0.65	-1.4
[illegible]	9	11	81.82%	38.57%	166	193	86.01%	0.41	-0.75
[illegible]	10	11	90.91%	28.75%	195	221	88.24%	-0.27	-1.16
[illegible]	7	7	100.00%	0.00%	201	216	93.06%	-0.71	-1.43
[illegible]	2	2	100.00%	0.00%	167	181	92.27%	-0.41	-1.25
[illegible]	4	4	100.00%	0.00%	183	210	87.14%	-0.76	-1.46
[illegible]	11	11	100.00%	0.00%	187	192	97.40%	-0.53	-1.32
[illegible]	1	1	100.00%	0.00%	169	189	89.42%	-0.34	-1.21
[illegible]					151	160	94.38%		
[illegible]	1	1	100.00%	0.00%	191	205	93.17%	-0.27	-1.16
[illegible]	3	3	100.00%	0.00%	132	142	92.96%	-0.47	-1.29



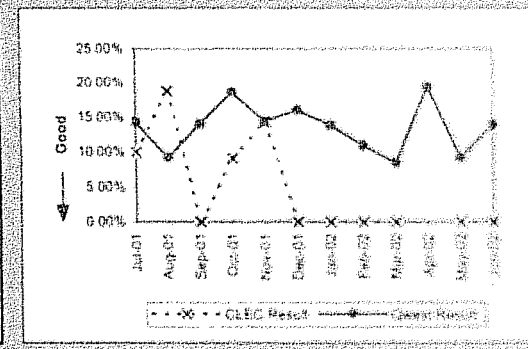
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	11:45	10	1:10	2:24	763:35	197	3:53	-0.46	-1.28
[illegible]	25:18	16	1:39	1:27	422:17	162	2:36	-0.64	-1.39
[illegible]	28:15	11	1:50	2:01	541:52	193	2:48	-0.5	-1.3
[illegible]	16:23	11	1:29	2:03	603:59	221	2:44	-0.57	-1.34
[illegible]	8:29	7	1:13	1:02	369:52	216	1:43	-0.35	-1.21
[illegible]	3:22	2	1:41	1:22	362:45	181	2:00	-0.08	-1.05
[illegible]	3:36	4	0:55	0:33	488:43	210	2:20	-0.66	-1.4
[illegible]	0:31	11	0:03	0:04	203:16	192	1:04	-1.81	-2.1
[illegible]	2:20	1	2:20		329:48	189	1:45	0.92	-0.44
[illegible]					290:44	160	1:49		
[illegible]	1:01	1	1:01		319:03	205	1:33	-0.16	-1.1
[illegible]	3:20	3	0:47	0:17	214:15	142	1:31	-0.43	-1.26



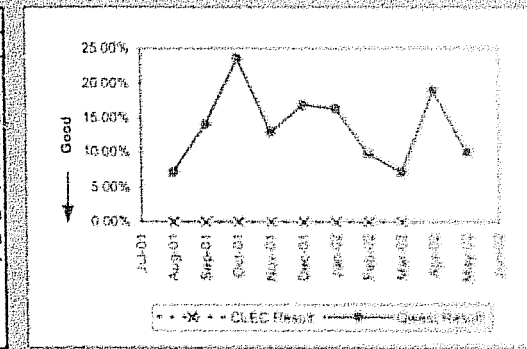
Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]	1	10	10.00%	30.00%	28	197	14.21%	-0.37	-1.23
[illegible]	3	16	18.75%	39.03%	15	163	9.20%	1.13	-0.31
[illegible]	0	11	0.00%	0.00%	27	193	13.99%	-1.3	-1.79
[illegible]	1	11	9.09%	28.75%	41	221	18.55%	-0.79	-1.48
[illegible]	1	7	14.29%	34.99%	31	216	14.35%	0	-1
[illegible]	0	2	0.00%	0.00%	29	181	16.02%	-0.61	-1.37
[illegible]	0	4	0.00%	0.00%	29	210	13.81%	-0.79	-1.48
[illegible]	0	11	0.00%	0.00%	21	192	10.94%	-1.13	-1.69
[illegible]	0	1	0.00%	0.00%	16	189	8.47%	-0.3	-1.18
[illegible]					31	160	19.38%		
[illegible]	0	1	0.00%	0.00%	19	205	9.27%	-0.32	-1.19
[illegible]	0	3	0.00%	0.00%	20	144	13.89%	-0.69	-1.42



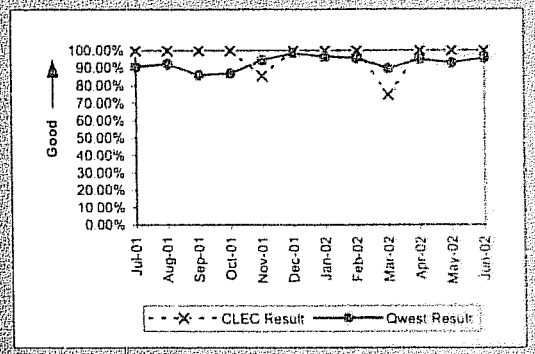
Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
[illegible]									
[illegible]	0	3	0.00%	0.00%	5	70	7.14%	-0.47	-1.29
[illegible]	0	4	0.00%	0.00%	11	78	14.10%	-0.79	-1.48
[illegible]	0	5	0.00%	0.00%	21	89	23.60%	-1.21	-1.74
[illegible]	0	3	0.00%	0.00%	13	100	13.00%	-0.66	-1.4
[illegible]	0	1	0.00%	0.00%	15	89	16.85%	-0.45	-1.27
[illegible]	0	2	0.00%	0.00%	18	110	16.36%	-0.62	-1.38
[illegible]	0	11	0.00%	0.00%	9	92	9.78%	-1.03	-1.63
[illegible]	0	1	0.00%	0.00%	8	112	7.14%	-0.28	-1.17
[illegible]					15	79	18.99%		
[illegible]					12	120	10.00%		

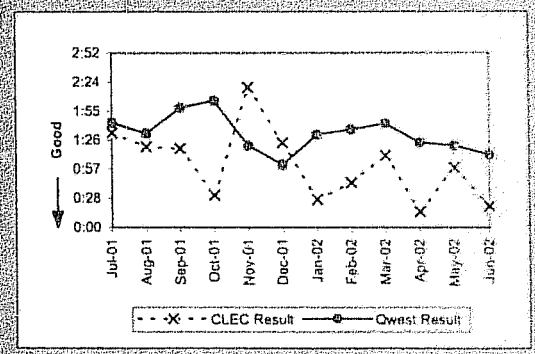


Checklist #14 - Resale - Primary ISDN Repair

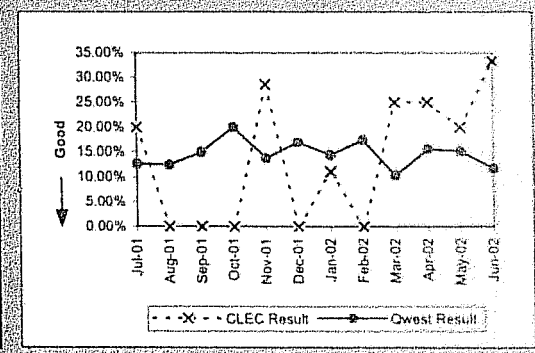
Out Of Service Cleared within 4 Hours (Percent) (MR-5B) (Parity)-- Interval Zone Two



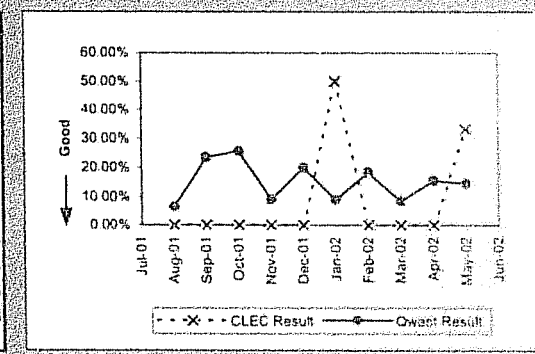
Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two



Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two



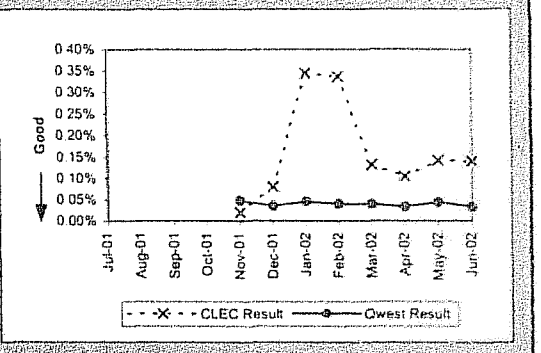
Repair Repeat Report Rate (Percent) (MR-7E*) (Parity)-- Interval Zone Two



Checklist #14 - Resale - Primary ISDN Repair

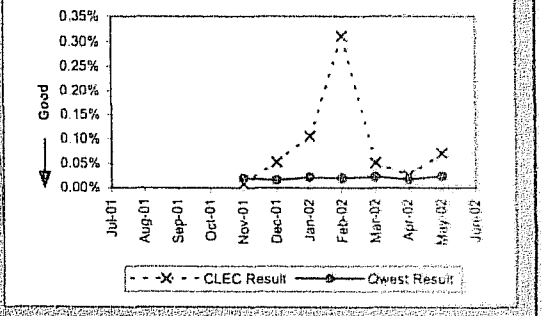
Mean Hour Duration (MR-8) (Parity) -- Interval Zone One and Two

				Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
		0.02%	1.42%	325	687722	0.05%	-3.16	-2.92
		0.06%	2.84%	246	696743	0.04%	1.47	-0.11
		0.04%	5.86%	321	711330	0.05%	8.64	4.25
		0.04%	5.86%	284	700358	0.04%	9.12	4.55
		0.10%	3.64%	276	700087	0.04%	2.87	0.74
		0.10%	3.24%	237	708388	0.03%	2.4	0.46
		0.14%	3.78%	317	715701	0.04%	3.03	0.84
		0.14%	3.78%	254	744230	0.03%	3.76	1.28



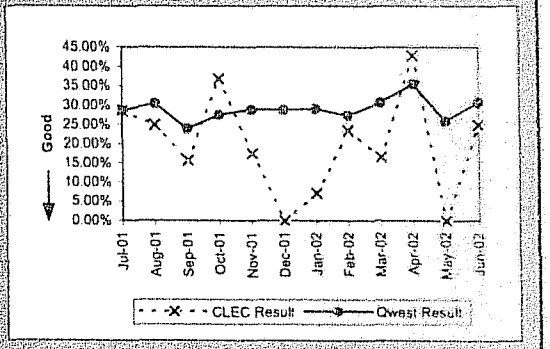
Mean Hour Duration (Percent) (MR-8) (Parity) -- Interval Zone One and Two

				Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
		0.01%	0.03%	133	687722	0.02%	-1.95	-2.18
		0.05%	2.32%	114	696743	0.02%	1.78	0.08
		0.01%	3.25%	155	711330	0.02%	3.5	1.13
		0.01%	5.57%	141	700358	0.02%	12.7	6.72
		0.05%	2.30%	150	700087	0.02%	1.23	-0.25
		0.03%	1.62%	124	708388	0.02%	0.41	-0.75
		0.07%	2.67%	175	715701	0.02%	1.94	0.18



Customer Trouble Report Rate Report Results (Percent) (MR-10) (Diagnostic) -- Interval Zone One and Two

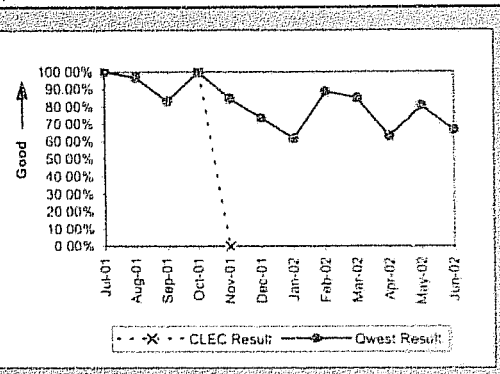
				Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
		28.87%	45.18%	114	398	28.64%	-0.01	-1
		25.00%	43.30%	117	384	30.47%	-0.61	-1.37
		15.19%	36.46%	86	359	23.96%	-0.81	-1.49
		30.84%	48.24%	122	443	27.54%	0.87	-0.47
		37.65%	38.12%	132	457	28.88%	-1	-1.61
		0.00%	0.00%	100	346	28.90%	-1.1	-1.67
		7.14%	25.75%	132	453	29.14%	-1.78	-2.08
		21.53%	42.42%	107	391	27.37%	-0.35	-1.21
		15.63%	37.27%	123	399	30.83%	-0.75	-1.45
		32.86%	46.49%	131	368	35.60%	0.39	-0.76
		0.00%	0.00%	111	428	25.93%	-1.44	-1.88
		25.66%	43.30%	113	367	30.79%	-0.35	-1.21



Checklist #14 - Resale - DS0 Installation

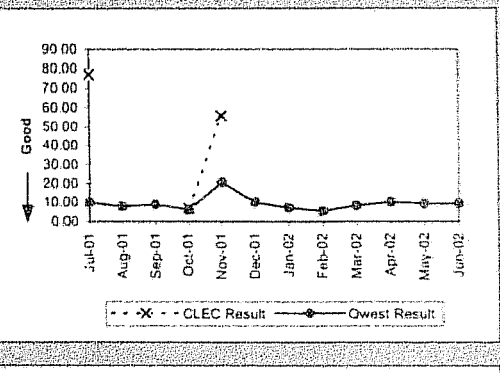
(Parity) - Dispatches Within MSAs

Qwest Num	Qwest Dem	Qwest Res	Mod Z Scr	Parity Scr
	19	100 00%		
	34	88 71%		
	12	83 33%		
	17	100 00%	N/A	N/A
	20	85 00%	1 36	-0 17
	19	73 68%		
	21	81 90%		
	18	88 89%		
	23	86 19%		
	19	63 16%		
	52	80 77%		
	36	66 67%		



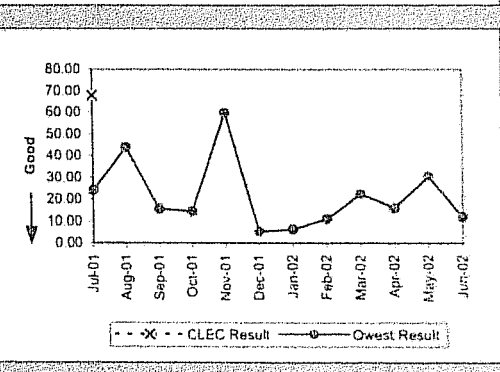
(Parity) - Dispatches Within MSAs

Qwest Num	Qwest Dem	Qwest Res	Mod Z Scr	Parity Scr
	30	10 03	3 72	1.26
	39	7 90		
	19	9 05		
	40	6 28	1 11	-0.32
	25	20 76	1 4	-0 15
	24	16 25		
	27	7 03		
	19	5 63		
	32	6 50		
	26	10 38		
	56	0 36		
	41	9 61		



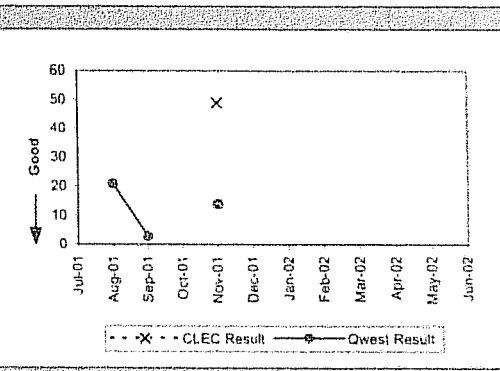
(Parity) - Dispatches Within MSAs

Qwest Num	Qwest Dem	Qwest Res	Mod Z Scr	Parity Scr
	4	24 25	0 67	-0 59
	2	44 50		
	4	15 75		
	3	14 67		
	6	59 67		
	6	5 33		
	9	6 44		
	2	11 50		
	4	22 50		
	8	16 12		
	15	30 80		
	15	12 00		



(Parity) - Dispatches Within MSAs

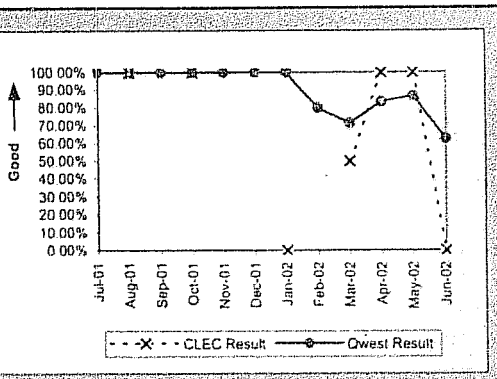
Qwest Num	Qwest Dem	Qwest Res	Mod Z Scr	Parity Scr
	1	21 00		
	1	3 00		
	2	14 00	3 72	1 26



Checklist #14 - Resale - DS0 Installation

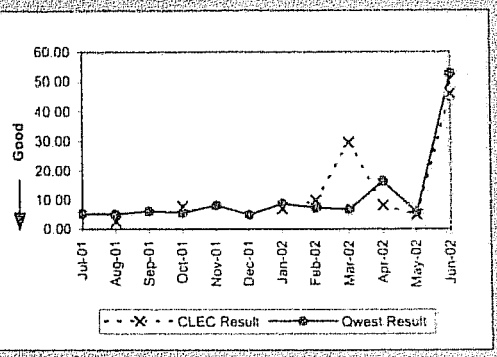
(OP-3) (Parity) -- Dispatches Outside MSAs

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				5	5	100 00%		
				8	8	100 00%	N/A	N/A
				19	19	100 00%		
				8	8	100 00%	N/A	N/A
				11	11	100 00%		
				6	6	100 00%		
				6	6	100 00%	N/A	-0 04
				4	5	80 00%		
				5	7	71 43%	0 35	-0 79
				10	12	83 33%	-0 60	-1 42
				13	15	86 67%	-0 38	-1 23
				5	8	62 50%	0 78	-0 53



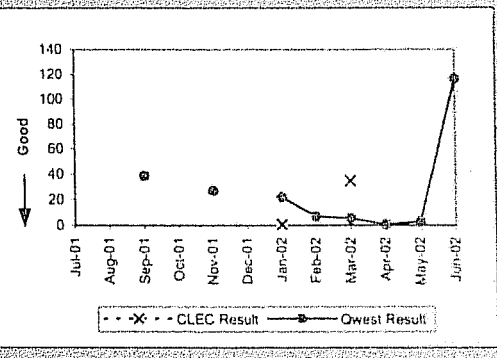
(OP-4B) (Parity) -- Dispatches Outside MSAs

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				32	6	5 33		
				41	8	5 12	-2 34	-2 42
				141	23	6 13		
				56	10	5 60	1 26	-0 23
				98	12	8 17		
				44	9	4 89		
				97	11	8 82	-0 25	-1 15
				59	8	7 38	0 64	-0 61
				48	7	6 86	1 73	0 05
				249	15	16 60	-0 29	-1 17
				118	20	5 90	-0 4	-1 25
				526	10	52 60	-0 05	-1 03



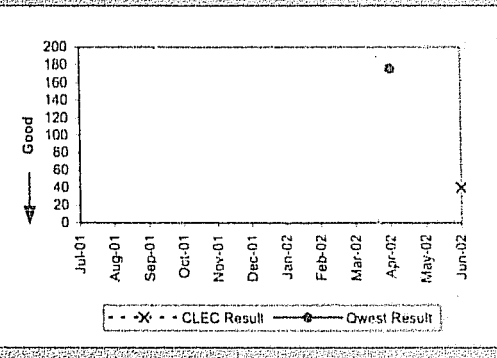
(OP-6A-2) (Parity) -- Dispatches Outside MSAs

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				39	1	39 00		
				27	1	27 00		
				22	1	22 00		
				7	1	7 00		
				11	2	5 50	1 05	-0.36
				1	1	1 00		
				10	3	3 33		
				466	4	116.50		



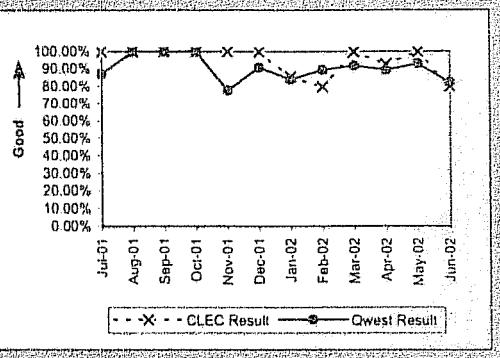
(OP-6B-2) (Parity) -- Dispatches Outside MSAs

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				176	1	176 00		

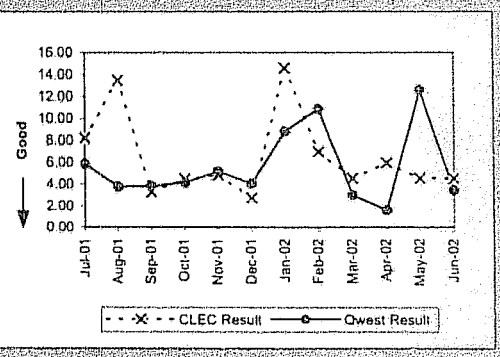


Checklist #14 - Resale - DS0 Installation

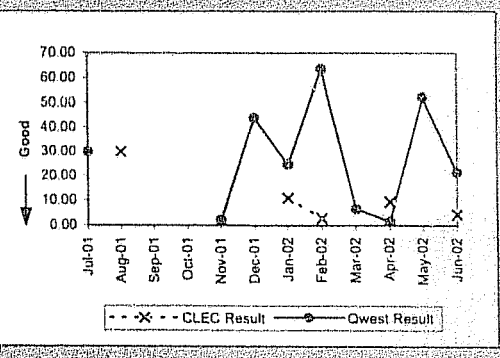
						Qwest Res	Mod Z Scr	Parity Scr
					54	39	87.18%	-0.73	-1.44
					41	41	100.00%	N/A	N/A
					13	13	100.00%	N/A	N/A
					10	10	100.00%	N/A	N/A
					9	9	77.78%	-1.06	-1.64
					25	22	90.91%	-1.16	-1.71
					21	25	84.00%	-0.11	-1.07
					17	19	89.47%	0.45	-0.73
					50	50	92.00%	-0.73	-1.44
					43	48	89.58%	-0.35	-1.21
					18	15	93.33%	-0.56	-1.35
					34	34	82.35%	0.16	-0.9



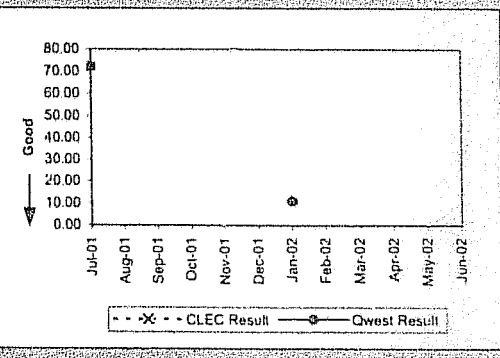
						Qwest Res	Mod Z Scr	Parity Scr
					195	33	5.91	0.35	-0.79
					171	45	3.80	2.88	0.75
					54	14	3.86	-0.83	-1.5
					56	12	4.17	0.35	-0.79
					31	6	5.17	-0.22	-1.13
					94	23	4.09	-0.88	-1.53
					231	26	8.88	0.57	-0.65
					174	16	10.88	-0.48	-1.29
					159	52	3.04	1.04	-0.37
					74	46	1.61	3.72	1.26
					262	16	12.62	-0.5	-1.3
					101	20	3.48	1.16	-0.29



						Qwest Res	Mod Z Scr	Parity Scr
					60	2	30.00		
					9	4	2.25		
					88	2	44.00		
					125	5	25.00	-0.69	-1.42
					191	3	63.67	-1.71	-2.04
					27	4	6.75		
					8	5	1.60	1.7	0.03
					157	3	52.33		
					151	7	21.57	-0.8	-1.36



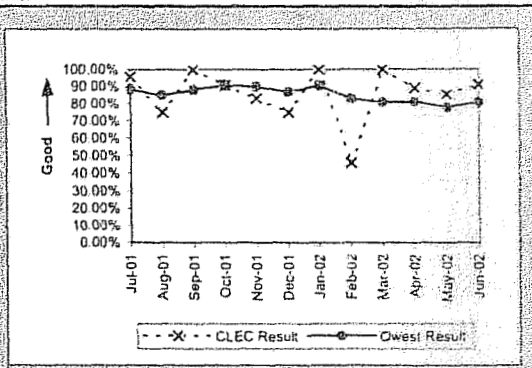
						Qwest Res	Mod Z Scr	Parity Scr
					362	5	72.40		
					11	1	11.00		



Checklist #14 - Resale - DS0 Installation

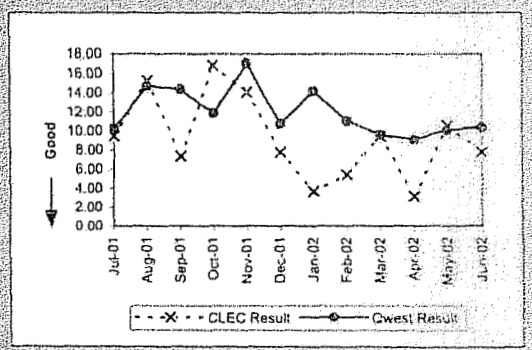
Installation Intervals (Percent) (OP-3D) (Parity)-- Interval Zone One

					Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
					78	79	88.61%	-0.98	-1.59
					142	167	85.03%	0.73	-0.55
					75	85	88.24%	-0.71	-1.43
					140	154	90.91%	0	-1
					84	93	90.32%	0.51	-0.69
					81	93	87.10%	0.88	-0.47
					119	131	90.84%	-0.7	-1.42
					108	130	83.08%	3.74	1.27
					84	104	80.77%	-1.07	-1.65
					78	96	81.25%	-1.22	-1.74
					91	117	77.78%	-0.91	-1.49
					92	114	80.70%	-1.18	-1.71



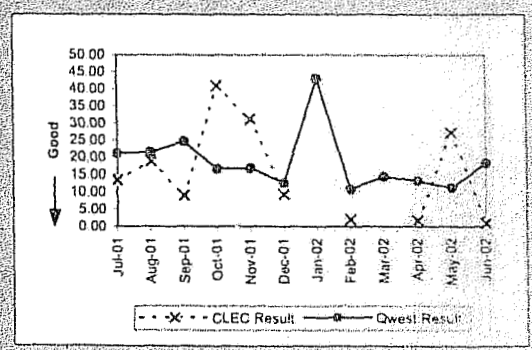
Installation Intervals (Average Days) (OP-4D) (Parity)-- Interval Zone One

					Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
				4.81	1270	124	10.24	-0.23	-1.14
				14.35	3535	240	14.73	1.22	-0.26
				4.88	1755	122	14.39	-0.69	-1.42
				23.05	2166	182	11.90	1.51	-0.08
				19.80	2477	145	17.08	-0.34	-1.21
				4.81	1209	112	10.79	-0.66	-1.4
				2.32	2060	145	14.21	-0.52	-1.32
				3.09	1727	156	11.07	-2.2	-2.34
				10.61	1224	127	9.64	-0.02	-1.01
				1.97	1017	111	9.16	-3.37	-3.05
				22.15	1351	133	10.16	0.32	-0.81
				3.61	1358	130	10.45	-0.58	-1.35



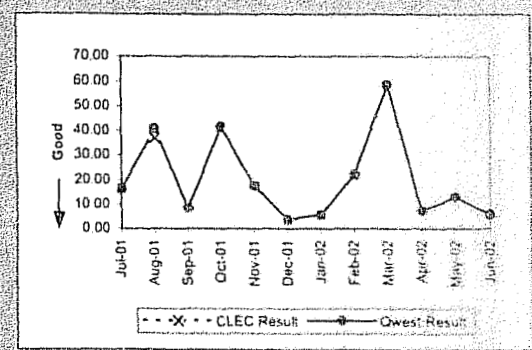
Installation Intervals for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

				Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
				10.81	529	25	21.16	-0.36	-1.22
				15.79	1184	55	21.53	-0.14	-1.08
					810	33	24.73	-0.45	-1.27
				31.69	285	47	16.70	1.63	-0.01
				25.68	1102	65	16.95	1.51	-0.08
				0.56	472	37	12.76	-0.3	-1.18
					1638	38	43.11		
				0.62	470	43	10.93	-3.06	-2.86
					290	29	14.50		
				0.41	306	23	13.30	-1.92	-2.17
				43.04	417	37	11.27	1.17	-0.29
				0.00	552	30	18.40	-0.74	-1.45



Installation Intervals for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

				Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
					81	5	16.20		
					410	10	41.00	-0.05	-1.03
					35	4	8.75		
					250	6	41.67		
					88	5	17.60		
					15	4	3.75		
					35	6	5.83		
					90	4	22.50		
					352	6	58.67		
					37	5	7.40		
					26	2	13.00		
					12	2	6.00		



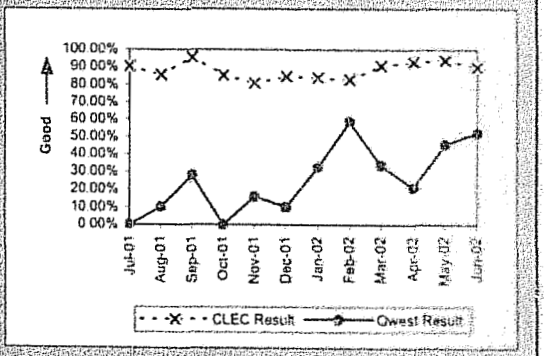
Checklist #14 - Resale - DS0 Installation

Percent Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Checklist #14 - Resale - DS0 Installation

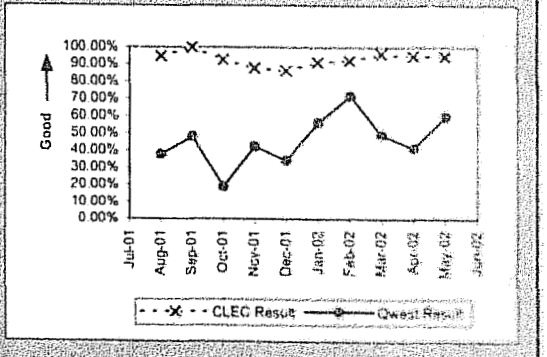
New Service Installation Quality (Percent) (OP-5) (Parity)-- Interval Zone One and Two

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	97	102	90.65%	29.11%	0	413	0.00%	N/A	
	66	77	85.71%	34.99%	47	469	10.02%	-20.5	-13.46
	40	46	95.83%	19.98%	131	467	28.05%	-9.95	-7.05
	47	55	85.45%	35.26%	0	433	0.00%	N/A	
	47	58	81.03%	39.20%	69	436	15.83%	-12.78	-8.77
	50	59	84.75%	35.95%	35	348	10.06%	-17.64	-11.72
	48	57	84.21%	36.46%	131	402	32.59%	-7.78	-5.73
	44	53	83.02%	37.55%	247	419	58.95%	-3.36	-3.04
	50	55	90.91%	28.75%	126	375	33.60%	-8.4	-6.11
	93	100	93.00%	25.51%	78	373	20.91%	-15.74	-10.57
	124	132	93.94%	23.86%	173	380	45.53%	-9.62	-6.85
	106	120	88.00%	30.00%	205	392	52.30%	-7.24	-5.4



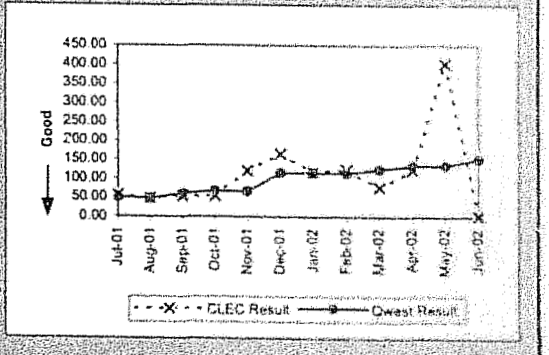
New Service Installation Quality (Percent) (OP-5*) (Parity)-- Interval Zone One and Two

			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	73	77	94.81%	22.19%	178	469	37.95%	-9.53	-6.79
	46	46	100.00%	0.00%	225	467	48.18%	-6.84	-5.16
	51	55	92.73%	25.97%	83	433	19.17%	-13.05	-8.94
	51	58	87.93%	32.58%	185	436	42.43%	-6.59	-5
	51	59	86.44%	34.24%	120	348	34.48%	-7.76	-5.72
	52	57	91.23%	28.29%	227	402	56.47%	-4.95	-4.01
	49	53	92.45%	26.42%	301	419	71.84%	-3.14	-2.91
	53	55	96.36%	18.72%	184	375	49.07%	-6.55	-4.98
	95	100	95.00%	21.79%	155	373	41.56%	-9.63	-6.85
	125	132	94.70%	22.41%	227	380	59.74%	-7.06	-5.29



Nominal Six Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

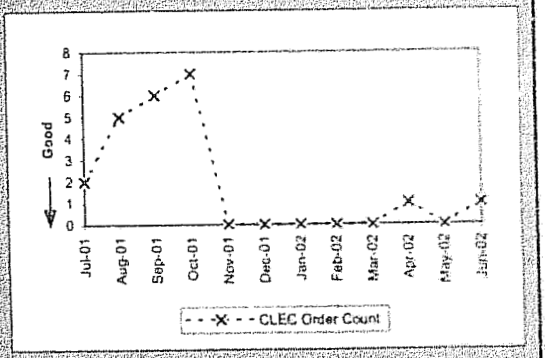
			CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	511	9	56.78	120.09	7022	137	51.26	1.51	-0.08
	581	14	48.64	102.62	9325	195	47.82	1.45	-0.12
	750	14	54.29	106.71	10134	168	60.32	-0.31	-1.19
	773	14	55.14	113.49	10683	158	67.61	-0.57	-1.35
	609	5	121.40	192.79	12079	183	66.01	1.9	0.15
	664	4	166.00	213.19	17511	151	115.97	0.98	-0.4
	707	6	117.83	195.58	17481	151	115.77	0.15	-0.91
	746	6	124.33	203.15	19146	167	114.65	0.31	-0.81
	938	12	78.17	153.92	20594	165	124.81	-1.51	-1.92
	992	8	124.00	188.67	20975	156	134.46	-0.26	-1.16
	808	2	404.00	260.22	22807	169	134.95	3.09	0.88
	7	2	3.50	4.95	24281	158	153.68	-1.62	-1.99



Checklist #14 - Resale - DS0 Installation

Count of Pending Orders Delayed for Facilities Reasons DS0 (OP-15B) (Diagnostic)

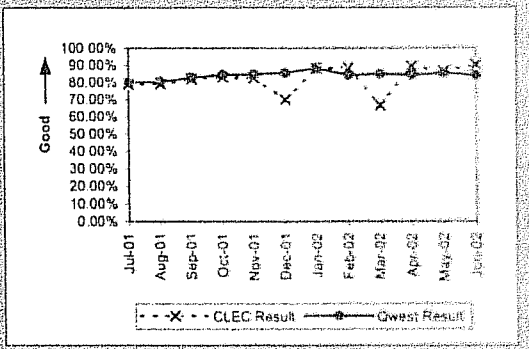
Date	CLEC Order Count
[illegible]	2
[illegible]	5
[illegible]	6
[illegible]	7
[illegible]	0
[illegible]	0
[illegible]	0
[illegible]	0
[illegible]	0
[illegible]	1
[illegible]	0
[illegible]	1



Checklist #14 - Resale - DS0 Repair

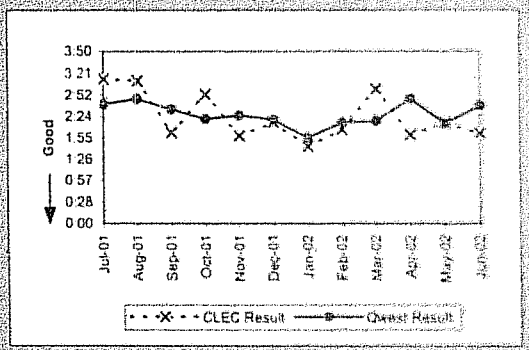
All Troubles Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	49	62	79.03%	40.71%	3185	3972	80.19%	0.25	-0.85
Aug-01	42	53	79.25%	40.56%	3441	4278	80.43%	0.24	-0.85
Sep-01	23	28	82.14%	38.30%	2606	3142	82.94%	0.15	-0.91
Oct-01	30	36	83.33%	37.27%	3313	3913	84.67%	0.26	-0.84
Nov-01	29	35	82.86%	37.69%	2646	3114	84.97%	0.38	-0.77
Dec-01	7	10	70.00%	45.83%	2467	2872	85.90%	1.3	-0.21
Jan-02	23	26	88.46%	31.95%	2592	2929	88.49%	0.07	-0.96
Feb-02	16	18	88.89%	31.43%	2238	2649	84.48%	-0.51	-1.31
Mar-02	10	15	66.67%	47.14%	2203	2586	85.19%	1.79	0.09
Apr-02	17	19	89.47%	30.69%	2557	3030	84.39%	-0.61	-1.37
May-02	13	15	86.67%	33.99%	2313	2703	85.57%	-0.12	-1.07
Jun-02	19	21	90.48%	29.35%	2481	2948	84.16%	-0.79	-1.48



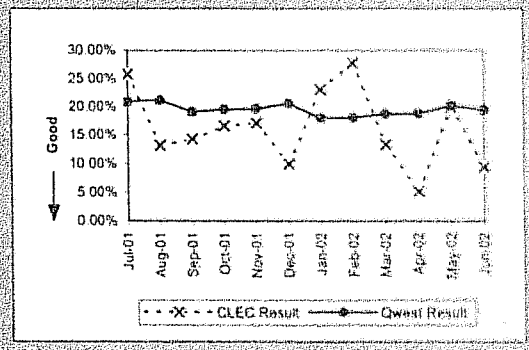
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	200:33	62	3:14	6:18	10675:37	3972	2:41	2.03	0.24
Aug-01	169:26	53	3:12	4:40	11943:53	4278	2:48	1.88	0.14
Sep-01	57:22	28	2:03	2:09	8076:03	3142	2:34	-0.6	-1.36
Oct-01	164:23	36	2:54	5:02	9184:48	3913	2:21	2.01	0.22
Nov-01	69:19	35	1:59	2:05	7576:05	3114	2:26	-0.55	-1.33
Dec-01	22:54	10	2:17	1:53	6724:41	2872	2:20	-0.04	-1.02
Jan-02	44:55	26	1:44	2:13	5680:47	2929	1:56	-0.32	-1.19
Feb-02	38:09	18	2:07	2:31	5993:30	2649	2:16	-0.14	-1.09
Mar-02	45:20	15	3:01	3:35	5939:01	2586	2:18	0.99	-0.4
Apr-02	38:03	19	2:00	2:14	8494:28	3030	2:48	-0.32	-1.19
May-02	33:56	15	2:16	1:52	6077:54	2703	2:15	0.29	-0.82
Jun-02	42:48	21	2:02	2:10	7817:34	2948	2:39	-0.45	-1.28



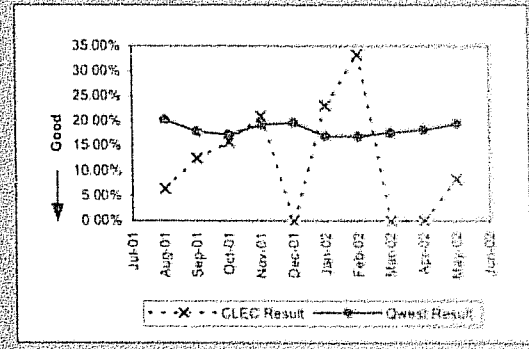
Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	16	62	25.81%	43.76%	833	3972	20.97%	0.93	-0.44
Aug-01	7	53	13.21%	33.86%	906	4278	21.18%	-1.41	-1.86
Sep-01	4	28	14.29%	34.99%	602	3142	19.16%	-0.65	-1.4
Oct-01	6	36	16.67%	37.27%	765	3913	19.55%	-0.43	-1.26
Nov-01	6	35	17.14%	37.69%	613	3114	19.69%	-0.38	-1.23
Dec-01	1	10	10.00%	30.00%	591	2872	20.58%	-0.83	-1.5
Jan-02	6	26	23.08%	42.13%	528	2929	18.03%	0.68	-0.59
Feb-02	5	18	27.78%	44.79%	479	2649	18.08%	1.03	-0.37
Mar-02	2	15	13.33%	33.99%	485	2586	18.75%	-0.54	-1.33
Apr-02	1	19	5.26%	22.33%	571	3030	18.84%	-1.51	-1.92
May-02	3	15	20.00%	40.00%	548	2703	20.27%	-0.03	-1.02
Jun-02	2	21	9.52%	29.35%	574	2948	19.47%	-1.15	-1.7



Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

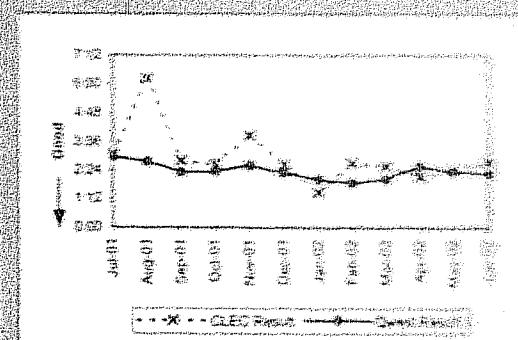
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	2	31	6.45%	24.57%	604	2989	20.21%	-1.9	-2.15
Sep-01	2	16	12.50%	33.07%	372	2081	17.88%	-0.56	-1.34
Oct-01	3	19	15.79%	36.46%	447	2598	17.21%	-0.16	-1.1
Nov-01	4	19	21.05%	40.77%	395	2051	19.26%	0.24	-0.86
Dec-01	0	6	0.00%	0.00%	388	1981	19.59%	-1.21	-1.73
Jan-02	3	13	23.08%	42.13%	316	1867	16.93%	0.6	-0.63
Feb-02	4	12	33.33%	47.14%	315	1866	16.88%	1.39	-0.16
Mar-02	0	10	0.00%	0.00%	306	1738	17.61%	-1.46	-1.89
Apr-02	0	11	0.00%	0.00%	379	2090	18.13%	-1.56	-1.95
May-02	1	12	8.33%	27.64%	363	1871	19.40%	-0.97	-1.59
Jun-02									



Owest-PID - Results - [Regional]

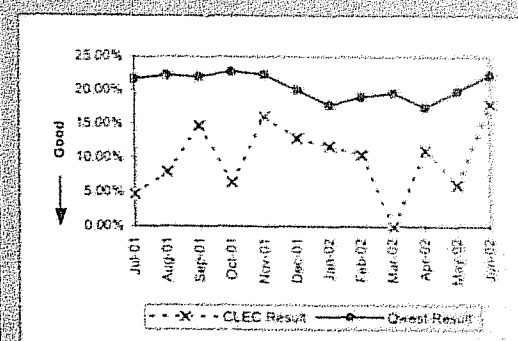
Mean Time to Restore (Hours:Minutes) (MR-5E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	132:51	43	3:05	4:08	10205:37	3422	2:59	1.66	[illegible]
Aug-01	312:51	50	6:15	21:24	10261:25	3688	2:47	1.54	[illegible]
Sep-01	95:48	34	2:49	3:48	6018:50	2588	2:20	1.61	[illegible]
Oct-01	83:22	31	2:41	3:59	6647:31	2799	2:22	1.36	[illegible]
Nov-01	120:42	31	3:54	4:46	5587:40	2138	2:37	1.51	[illegible]
Dec-01	82:50	31	2:40	3:59	4784:59	2096	2:17	0.83	[illegible]
Jan-02	51:07	34	1:30	1:50	4326:55	2132	2:02	-0.68	[illegible]
Feb-02	51:35	19	2:43	4:03	3411:19	1834	1:52	1.26	[illegible]
Mar-02	20:47	8	2:36	3:04	4193:26	2048	2:03	0.84	[illegible]
Apr-02	58:11	27	2:09	2:29	6014:20	2334	2:35	-0.25	[illegible]
May-02	78:38	33	2:25	2:20	5787:49	2451	2:22	0.18	[illegible]
Jun-02	108:02	39	2:46	2:45	5527:14	2442	2:16	0.95	[illegible]



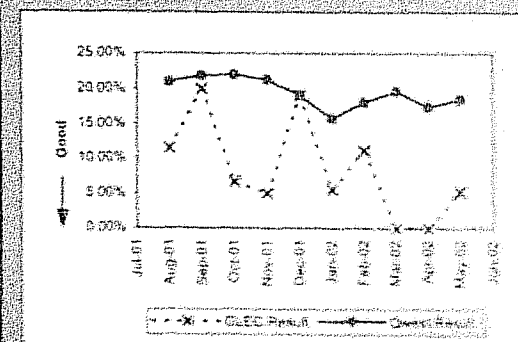
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	2	43	4.65%	21.06%	741	3422	21.65%	-2.69	-2.64
Aug-01	4	50	8.00%	27.13%	820	3688	22.23%	-2.4	-2.46
Sep-01	5	34	14.71%	35.42%	570	2588	22.02%	-1.02	-1.62
Oct-01	2	31	6.45%	24.57%	639	2799	22.83%	-2.16	-2.31
Nov-01	5	31	16.13%	36.78%	479	2138	22.40%	-0.83	-1.51
Dec-01	4	31	12.90%	33.52%	420	2096	20.04%	-0.99	-1.6
Jan-02	4	34	11.76%	32.22%	379	2132	17.78%	-0.91	-1.55
Feb-02	2	19	10.53%	30.69%	349	1834	19.03%	-0.94	-1.57
Mar-02	0	8	0.00%	0.00%	402	2048	19.63%	-1.4	-1.85
Apr-02	3	27	11.11%	31.43%	408	2334	17.48%	-0.87	-1.53
May-02	2	33	6.06%	23.86%	487	2451	19.87%	-1.97	-2.2
Jun-02	7	39	17.95%	38.38%	543	2442	22.24%	-0.64	-1.39



Repair Repeat Report Rate (Percent) (MR-7E') (Parity)-- Interval Zone Two

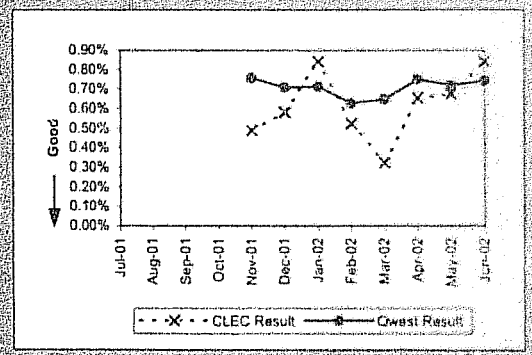
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Score	Parity Score
Jul-01	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Aug-01	3	26	11.54%	31.95%	533	2542	20.97%	-1.18	-1.71
Sep-01	3	15	20.00%	40.00%	385	1763	21.84%	-0.17	-1.1
Oct-01	1	15	6.67%	24.94%	402	1825	21.99%	-1.43	-1.87
Nov-01	1	20	5.00%	21.79%	287	1349	21.28%	-1.77	-2.07
Dec-01	4	21	19.05%	39.27%	241	1265	19.05%	0	-1
Jan-02	1	18	5.56%	22.91%	208	1318	15.78%	-1.15	-1.72
Feb-02	1	9	11.11%	31.43%	212	1175	18.04%	-0.54	-1.33
Mar-02	0	4	0.00%	0.00%	255	1305	19.62%	-0.99	-1.6
Apr-02	0	14	0.00%	0.00%	275	1585	17.41%	-1.71	-2.04
May-02	1	19	5.26%	22.33%	312	1678	18.59%	-1.43	-1.9
Jun-02	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]



Checklist #14 - Resale - DS0 Repair

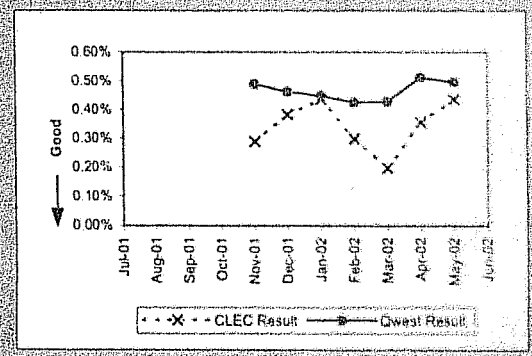
Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01	66	13465	0.49%	6.98%	5252	694524	0.76%	-3.53	-3.15
Dec-01	41	7043	0.58%	7.61%	4968	701335	0.71%	-1.26	-1.76
Jan-02	60	7115	0.84%	9.14%	5061	709091	0.71%	1.29	-0.21
Feb-02	37	7053	0.52%	7.22%	4483	714587	0.63%	-1.09	-1.66
Mar-02	23	7067	0.33%	5.70%	4634	715585	0.65%	-3.36	-3.04
Apr-02	46	7036	0.65%	8.06%	5364	715673	0.75%	-0.93	-1.56
May-02	48	7111	0.68%	8.19%	5154	716284	0.72%	-0.44	-1.27
Jun-02	60	7120	0.84%	9.14%	5390	724645	0.74%	0.97	-0.41



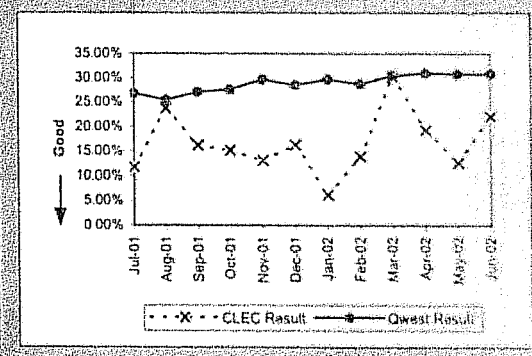
Trouble Rate (Percent) (MR-8*) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01	39	13465	0.29%	5.37%	3400	694524	0.49%	-3.29	-3
Dec-01	27	7043	0.38%	6.18%	3246	701335	0.46%	-0.98	-1.59
Jan-02	31	7115	0.44%	6.59%	3185	709091	0.45%	-0.17	-1.1
Feb-02	21	7053	0.30%	5.45%	3041	714587	0.43%	-1.64	-2
Mar-02	14	7067	0.20%	4.45%	3058	715585	0.43%	-2.94	-2.79
Apr-02	25	7036	0.36%	5.95%	3675	715673	0.51%	-1.85	-2.12
May-02	31	7111	0.44%	6.59%	3549	716284	0.50%	-0.71	-1.43
Jun-02									



Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)-- Interval Zone One and Two

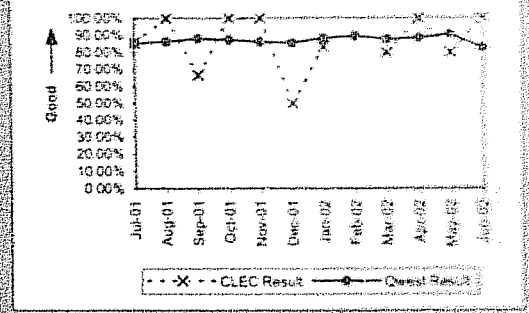
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	14	119	11.76%	32.22%	2708	10102	26.81%	-3.68	-3.24
Aug-01	32	135	23.70%	42.53%	2719	10685	25.45%	-0.46	-1.28
Sep-01	12	74	16.22%	36.86%	2124	7854	27.04%	-2.09	-2.27
Oct-01	12	79	15.19%	35.89%	2562	9274	27.63%	-2.46	-2.5
Nov-01	10	76	13.16%	33.80%	2214	7466	29.65%	-3.13	-2.9
Dec-01	8	49	16.33%	36.96%	1983	6951	28.53%	-1.88	-2.15
Jan-02	4	64	6.25%	24.21%	2142	7203	29.74%	-4.09	-3.49
Feb-02	0	43	13.95%	34.65%	1810	6293	28.76%	-2.14	-2.3
Mar-02	10	33	30.30%	45.96%	2031	6665	30.47%	-0.02	-1.01
Apr-02	11	57	19.30%	39.46%	2409	7773	30.99%	-1.9	-2.16
May-02	7	55	12.73%	33.33%	2293	7447	30.79%	-2.89	-2.76
Jun-02	17	77	22.08%	41.48%	2399	7789	30.80%	-1.65	-2



Checklist #14 - Resale - DS1 Installation

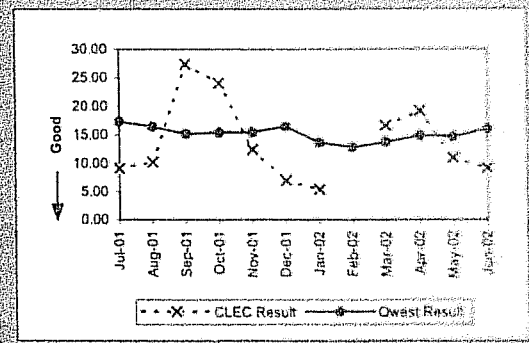
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	6	7	85.71%	34.99%	2516	2945	85.43%	-0.02	-1.81
Aug-01	6	6	100.00%	0.00%	2963	3432	86.33%	-0.89	-1.54
Sep-01	2	3	66.67%	47.14%	2882	3251	88.63%	0.92	-0.44
Oct-01	2	2	100.00%	0.00%	3120	3571	87.37%	-0.54	-1.33
Nov-01	1	1	100.00%	0.00%	2809	3258	86.22%	-0.4	-1.24
Dec-01	1	2	50.00%	50.00%	2616	3056	85.60%	1.06	-0.35
Jan-02	5	6	83.33%	37.27%	3415	3867	88.31%	0.41	-0.75
Feb-02					3238	3613	89.62%		
Mar-02	4	5	80.00%	40.00%	2771	3159	87.72%	0.52	-0.68
Apr-02	10	10	100.00%	0.00%	3104	3505	88.56%	-1.13	-1.69
May-02	4	5	80.00%	40.00%	3284	3627	90.54%	0.73	-0.56
Jun-02	6	6	100.00%	0.00%	2896	3495	82.86%	-1.11	-1.66



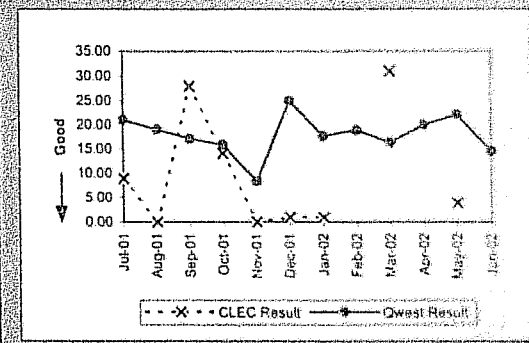
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	64	7	9.14	8.43	73506	4244	17.32	-1.25	-1.76
Aug-01	72	7	10.29	6.87	76695	4664	16.44	-0.99	-1.6
Sep-01	137	5	27.40	18.77	66905	4418	15.14	2.58	0.57
Oct-01	193	8	24.12	17.39	79727	5160	15.45	2.26	0.37
Nov-01	25	2	12.50	2.12	68216	4413	15.46	-0.29	-1.18
Dec-01	7	1	7.00		63510	3867	16.42	-0.53	-1.32
Jan-02	38	7	5.43	4.08	64286	4698	13.68	-1.82	-2.1
Feb-02					55946	4360	12.83		
Mar-02	100	6	16.67	12.08	52335	3803	13.76	0.9	-0.45
Apr-02	326	17	19.18	11.39	65915	4425	14.90	1.31	-0.2
May-02	55	5	11.00	9.08	67058	4575	14.66	-0.52	-1.31
Jun-02	46	5	9.20	3.03	72319	4518	16.01	-1.29	-1.79



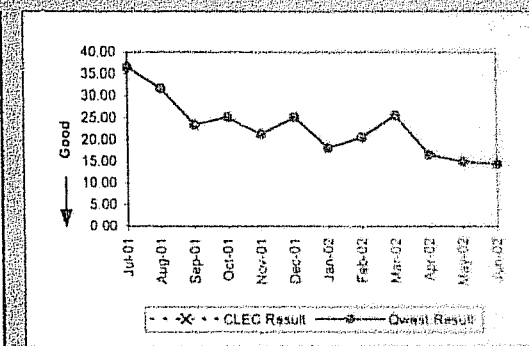
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	27	3	9.00	3.46	17222	821	20.98	-0.98	-1.59
Aug-01	0	1	0.00		15908	834	19.07	-0.78	-1.48
Sep-01	56	2	28.00	11.31	12179	711	17.13	2.1	0.27
Oct-01	113	8	14.12	14.99	14313	896	15.97	-0.25	-1.15
Nov-01	0	1	0.00		13363	1598	8.36	-0.5	-1.31
Dec-01	1	1	1.00		14666	586	25.03	-0.62	-1.38
Jan-02	1	1	1.00		10385	587	17.69	-0.84	-1.51
Feb-02					8683	461	18.84		
Mar-02	31	1	31.00		7991	488	16.38	1.28	-0.22
Apr-02					10616	531	19.99		
May-02	4	1	4.00		10826	487	22.23	-0.49	-1.3
Jun-02					10785	739	14.59		



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

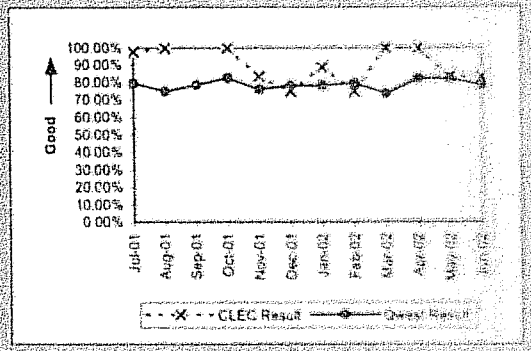
Date	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
Jul-01					5108	140	36.49		
Aug-01					4147	131	31.66		
Sep-01					2230	95	23.47		
Oct-01					2744	109	25.17		
Nov-01					2965	139	21.33		
Dec-01					2495	99	25.20		
Jan-02					1634	90	18.16		
Feb-02					700	34	20.59		
Mar-02					1175	46	25.54		
Apr-02					792	48	16.50		
May-02					792	53	14.94		
Jun-02					939	65	14.45		



Checklist #14 - Resale - DS1 Installation

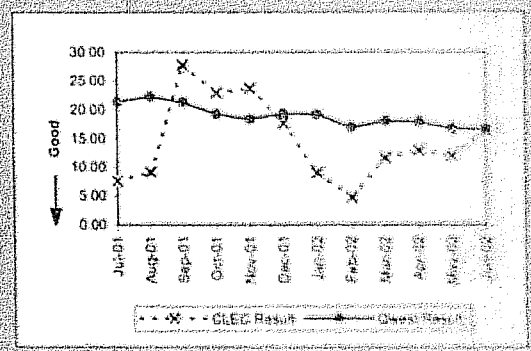
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	47	48	97.92%	14.28%	1317	1651	79.77%	-3.09	-2.88
Aug-01	3	3	100.00%	0.00%	1226	1634	75.03%	-1	-1.61
Sep-01					1135	1445	78.55%		
Oct-01	1	1	100.00%	0.00%	1536	1859	82.63%	-0.46	-1.28
Nov-01	5	6	83.33%	37.27%	1517	1994	76.08%	-0.42	-1.25
Dec-01	3	4	75.00%	43.30%	1367	1749	78.16%	0.19	-0.88
Jan-02	8	9	88.89%	31.43%	1386	1767	78.44%	-0.76	-1.46
Feb-02	3	4	75.00%	43.30%	1498	1878	79.77%	0.27	-0.84
Mar-02	3	3	100.00%	0.00%	1315	1785	73.67%	-1.03	-1.63
Apr-02	10	10	100.00%	0.00%	1646	2000	82.30%	-1.46	-1.89
May-02	5	6	83.33%	37.27%	2038	2472	82.44%	-0.06	-1.03
Jun-02	5	6	83.33%	37.27%	1685	2150	78.37%	-0.29	-1.18



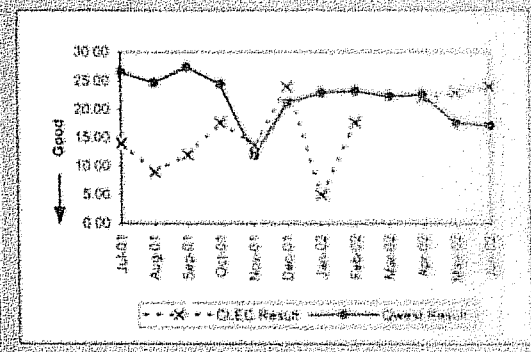
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	76	10	7.60	7.20	52783	2467	21.40	-2.08	-2.26
Aug-01	64	7	9.14	6.79	56572	2537	22.30	-1.47	-1.9
Sep-01	111	4	27.75	7.23	44831	2105	21.30	2.07	0.26
Oct-01	69	3	23.00	14.00	50939	2646	19.25	2.12	0.29
Nov-01	166	7	23.71	16.64	50135	2732	18.35	1.96	0.19
Dec-01	195	11	17.73	24.19	46661	2413	19.34	-0.32	-1.19
Jan-02	135	15	9.00	6.27	45263	2356	19.21	-1.99	-2.21
Feb-02	19	4	4.75	0.96	38339	2258	16.98	-1.4	-1.85
Mar-02	35	3	11.67	7.02	40983	2271	18.05	-0.58	-1.35
Apr-02	143	11	13.00	6.42	46620	2598	17.94	-1.02	-1.62
May-02	60	5	12.00	10.27	52256	3112	16.79	-0.78	-1.47
Jun-02	132	8	16.50	13.47	44380	2663	16.67	-0.03	-1.02



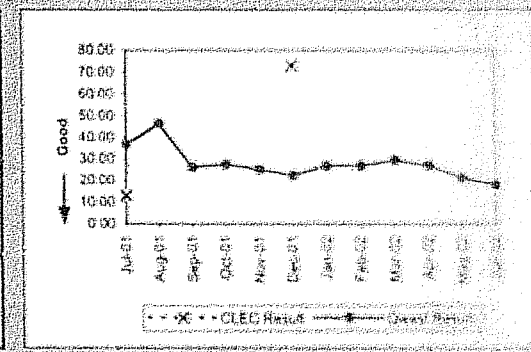
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	14	1	14.00		16376	617	26.54	-0.47	-1.23
Aug-01	18	2	9.00	0.00	17827	723	24.66	-0.81	-1.49
Sep-01	36	3	12.00	0.00	15360	560	27.43	-0.68	-1.41
Oct-01	53	3	17.67	19.14	15043	615	24.46	-0.38	-1.23
Nov-01	55	4	13.75	17.73	13683	1149	11.91	2.07	0.26
Dec-01	48	2	24.00	31.11	10853	513	21.16	0.51	-0.69
Jan-02	10	2	5.00	1.41	11807	515	22.93	-1.02	-1.62
Feb-02	53	3	17.67	14.47	10570	455	23.23	-0.38	-1.23
Mar-02					11876	532	22.32		
Apr-02	44	2	22.00	11.31	10240	453	22.60	-0.03	-1.02
May-02	69	3	23.00	5.20	9620	548	17.55	0.74	-0.55
Jun-02	48	2	24.00	14.14	9535	558	17.09	0.76	-0.54



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

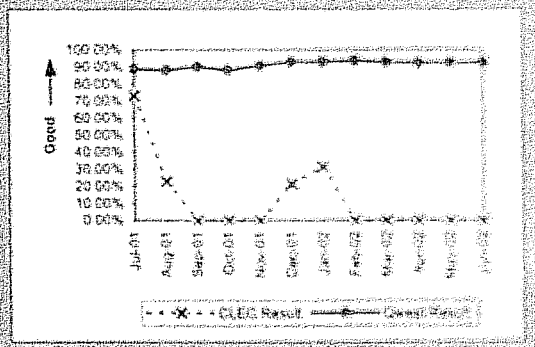
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	13	1	13.00		3457	94	36.78	-0.78	-1.47
Aug-01					5363	116	46.23		
Sep-01					2089	80	26.11		
Oct-01					2297	84	27.35		
Nov-01					2828	113	25.03		
Dec-01	73	1	73.00		1244	56	22.21	2.03	0.24
Jan-02					2171	81	26.80		
Feb-02					1393	52	26.79		
Mar-02					1441	49	29.41		
Apr-02					1132	42	26.95		
May-02					1003	47	21.34		
Jun-02					921	51	18.06		



Checklist #14 - Resale - DS1 Installation

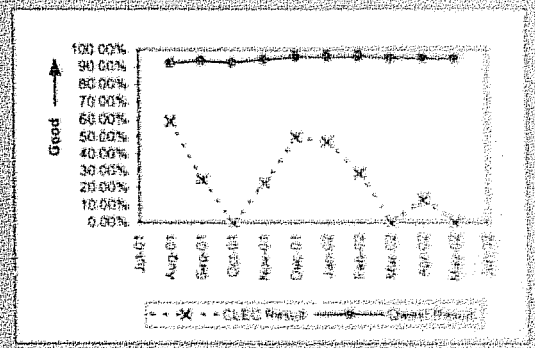
New Service Installation Quality (Percent) (OP-5) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	30	41	73.17%	44.31%	6156	6913	89.05%	2.83	0.72
Aug-01	9	39	23.08%	42.13%	6298	7139	88.22%	7.94	3.83
Sep-01	0	12	0.00%	0.00%	6394	7080	90.31%	7.21	3.38
Oct-01	0	12	0.00%	0.00%	6484	7338	88.36%	6.9	3.2
Nov-01	0	13	0.00%	0.00%	6937	7648	90.70%	7.59	3.61
Dec-01	3	14	21.43%	41.03%	6450	6933	93.03%	6.58	3
Jan-02	6	19	31.58%	46.48%	6415	6877	93.28%	6.82	3.15
Feb-02	0	14	0.00%	0.00%	6539	6975	93.75%	7.94	3.83
Mar-02	0	9	0.00%	0.00%	6036	6499	92.88%	6.61	3.02
Apr-02	0	23	0.00%	0.00%	6181	6697	92.30%	7.94	3.83
May-02	0	25	0.00%	0.00%	6923	7468	92.70%	7.94	3.83
Jun-02	0	15	0.00%	0.00%	6975	7556	92.31%	7.94	3.83



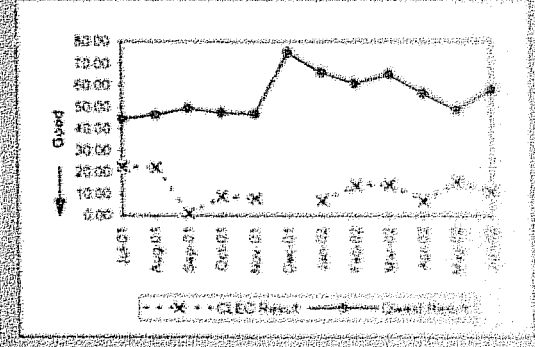
New Service Installation Quality (Percent) (OP-5*) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	23	39	58.97%	49.19%	6596	7139	92.39%	5.75	2.5
Sep-01	3	12	25.00%	43.30%	6625	7080	93.57%	5.93	2.61
Oct-01	0	12	0.00%	0.00%	6788	7338	92.50%	7.62	3.63
Nov-01	3	13	23.08%	42.13%	7210	7648	94.27%	6.5	2.95
Dec-01	7	14	50.00%	50.00%	6646	6933	95.86%	5.03	2.06
Jan-02	9	19	47.37%	49.93%	6598	6877	95.94%	6.16	2.75
Feb-02	4	14	28.57%	45.18%	6705	6975	96.13%	6.89	3.19
Mar-02	0	9	0.00%	0.00%	6184	6499	95.15%	7.1	3.32
Apr-02	3	23	13.04%	33.68%	6363	6697	95.01%	7.94	3.83
May-02	0	25	0.00%	0.00%	7090	7468	94.94%	7.94	3.83
Jun-02									



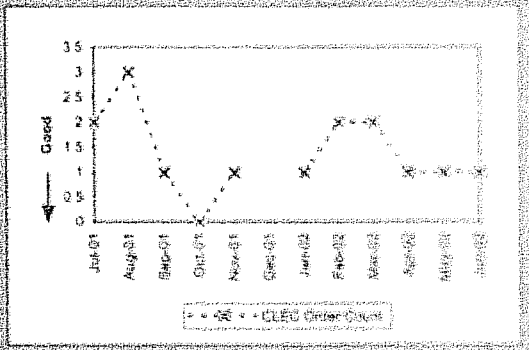
Interval for Pending Orders Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	45	2	22.50	27.58	70450	1578	44.65	-0.46	-1.28
Aug-01	111	5	22.20	25.65	71793	1539	46.65	-0.74	-1.45
Sep-01	2	2	1.00	1.41	72169	1452	49.70	-0.88	-1.53
Oct-01	9	1	9.00		69384	1455	47.69	-0.49	-1.3
Nov-01	8	1	8.00		73319	1564	46.88	-0.48	-1.29
Dec-01					61142	815	75.02		
Jan-02	7	1	7.00		69527	1053	66.03	-0.62	-1.36
Feb-02	28	2	14.00	18.38	69117	1132	61.06	-0.75	-1.45
Mar-02	43	3	14.33	6.66	67798	1039	65.25	-0.93	-1.56
Apr-02	7	1	7.00		71610	1265	56.61	-0.53	-1.33
May-02	31	2	15.50	19.09	76923	1566	49.12	-0.58	-1.35
Jun-02	22	2	11.00	2.83	83701	1447	57.84	-0.76	-1.45



Checklist #14 - Resale - DS1 Installation

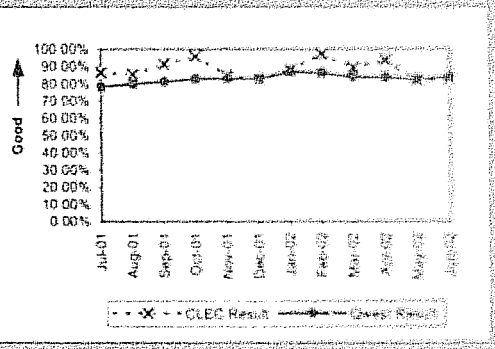
Count of Pending Orders Delayed for Facilities Reasons DS1 (OP-15B) (Diagnostic)	
Date	CLEC Order Count
Jul-01	2
Aug-01	3
Sep-01	1
Oct-01	0
Nov-01	1
Dec-01	
Jan-02	1
Feb-02	2
Mar-02	2
Apr-02	1
May-02	1
Jun-02	1



Checklist #14 - Resale - DS1 Repair

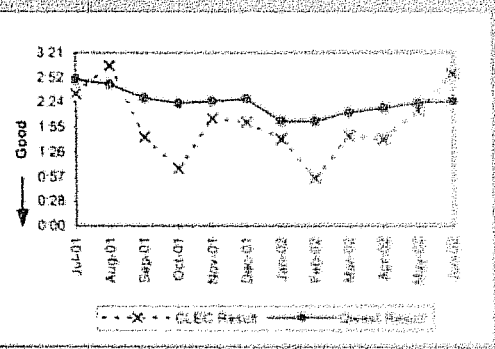
All Troubles Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	93	107	86 92%	33 72%	3988	5078	78 53%	-2 09	-2 27
Aug-01	140	163	85 89%	34 81%	4190	5223	80 22%	-1 79	-2 09
Sep-01	88	96	91 67%	27 64%	3571	4369	81 74%	-2 49	-2 51
Oct-01	100	104	96 15%	19 23%	4061	4880	83 22%	-3 49	-3 12
Nov-01	137	161	85 09%	35 62%	3500	4189	83 55%	-0 52	-1 31
Dec-01	30	36	83 33%	37 27%	2962	3561	83 18%	-0 02	-1 01
Jan-02	30	34	88 24%	32 22%	3341	3826	87 32%	-0 16	-1 1
Feb-02	36	37	97 30%	16 22%	2971	3437	86 44%	-1 92	-2 17
Mar-02	45	48	89 58%	30 55%	3055	3631	84 14%	-1 03	-1 62
Apr-02	47	50	94 00%	23 75%	3274	3895	84 06%	-1 91	-2 16
May-02	51	62	82 26%	38 20%	3226	3893	82 87%	0 16	-0 9
Jun-02	49	59	83 05%	37 52%	3508	4166	84 21%	0 27	-0 83



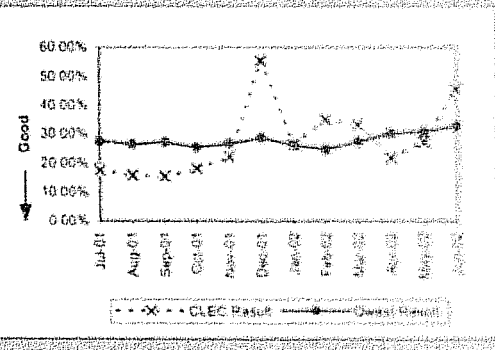
Mean Time to Restore (Hours:Minutes) (MR-5D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	274 12	107	2 34	4 32	14491 35	5078	2 51	-0 59	-1 36
Aug-01	508 50	163	3 07	9 34	14353 10	5223	2 45	0 5	-0 69
Sep-01	165 44	96	1 44	3 00	10835 06	4369	2 29	-1 95	-2 18
Oct-01	118 17	104	1 08	1 19	11617 03	4880	2 23	-3 51	-3 13
Nov-01	335 29	161	2 05	2 11	10127 22	4189	2 25	-1 16	-1 7
Dec-01	72 52	36	2 01	3 11	8779 36	3561	2 28	-0 65	-1 39
Jan-02	57 46	34	1 42	1 48	7765 14	3826	2 02	-0 62	-1 38
Feb-02	35 23	37	0 57	1 12	6974 59	3437	2 02	-2 11	-2 28
Mar-02	84 10	48	1 45	2 26	7961 26	3631	2 12	-1 01	-1 61
Apr-02	83 49	50	1 41	2 56	8893 50	3895	2 17	-1 21	-1 74
May-02	138 46	62	2 14	2 52	9295 13	3893	2 23	-0 28	-1 17
Jun-02	173 58	59	2 57	5 44	10056 02	4166	2 25	1 32	-0 2



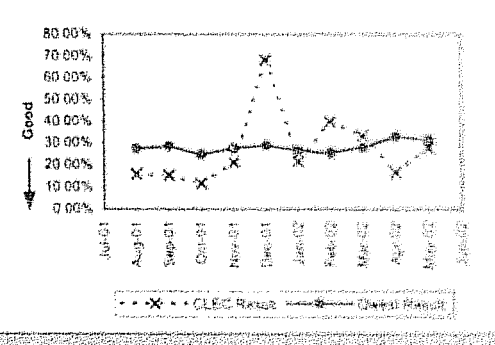
Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	19	107	17 76%	38 22%	1397	5078	27 51%	-2 24	-2 36
Aug-01	26	163	15 95%	36 62%	1386	5223	26 54%	-3 01	-2 83
Sep-01	15	96	15 63%	36 31%	1192	4369	27 28%	-2 54	-2 54
Oct-01	19	104	18 27%	38 64%	1243	4880	25 47%	-1 67	-2 01
Nov-01	36	161	22 36%	41 67%	1118	4189	26 69%	-1 22	-1 74
Dec-01	20	36	55 56%	49 69%	1021	3561	28 67%	3 34	1 03
Jan-02	9	34	26 47%	44 12%	1006	3826	26 29%	0 05	-0 97
Feb-02	13	37	35 14%	47 74%	851	3437	24 76%	1 41	-0 14
Mar-02	16	48	33 33%	47 14%	996	3631	27 43%	0 91	-0 45
Apr-02	11	50	22 00%	41 42%	1179	3895	30 27%	-1 26	-1 77
May-02	17	62	27 42%	44 61%	1201	3893	30 85%	-0 58	-1 35
Jun-02	27	59	45 76%	49 82%	1371	4166	32 91%	2 04	0 24



Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

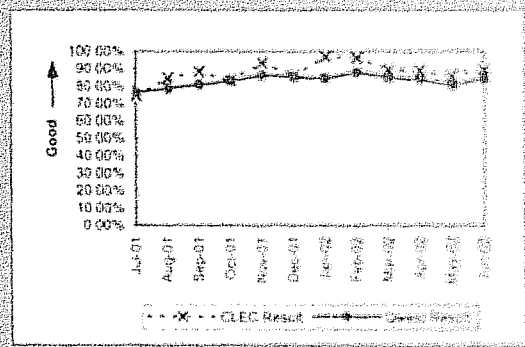
Date	CLEC Num	CLEC Denc	CLEC Resu	Std Dev	Qwest Num	Qwest Denc	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	16	101	15 84%	36 51%	935	3435	27 22%	-2 53	-2 54
Sep-01	9	58	15 52%	36 21%	813	2865	28 38%	-2 15	-2 31
Oct-01	6	51	11 76%	32 22%	787	3182	24 73%	-2 13	-2 29
Nov-01	22	104	21 15%	40 84%	739	2684	27 53%	-1 43	-1 87
Dec-01	13	19	68 42%	46 48%	651	2256	28 86%	3 51	1 14
Jan-02	5	23	21 74%	41 25%	644	2433	26 47%	-0 51	-1 31
Feb-02	8	20	40 00%	48 99%	552	2164	25 51%	1 42	-0 14
Mar-02	8	24	33 33%	47 14%	675	2401	28 11%	0 57	-0 65
Apr-02	4	24	16 67%	37 27%	876	2649	33 07%	-1 7	-2 03
May-02	10	36	27 78%	44 79%	865	2730	31 69%	-0 5	-1 3
Jun-02									



Checklist #14 - Resale - DS1 Repair

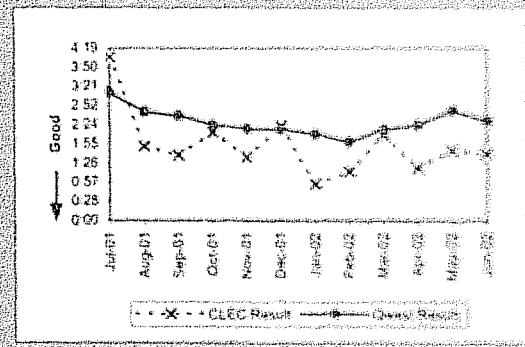
All Troubles Cleared within 4 hours (Percent) (MR-5B) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	50	75	74.67%	43.49%	2147	2800	76.68%	0.42	-0.74
Aug-01	85	100	85.00%	35.71%	2288	2899	78.92%	-1.46	-1.89
Sep-01	47	53	88.68%	31.68%	1684	2078	81.04%	-1.4	-1.85
Oct-01	66	79	83.54%	37.08%	1864	2240	83.21%	-0.08	-1.05
Nov-01	46	49	93.88%	23.97%	1726	1993	86.60%	-1.48	-1.9
Dec-01	19	22	86.36%	34.32%	1468	1719	85.40%	-0.13	-1.08
Jan-02	37	38	97.37%	16.01%	1461	1723	84.79%	-2.14	-2.3
Feb-02	31	32	96.88%	17.40%	1470	1668	88.13%	-1.52	-1.92
Mar-02	35	39	89.74%	30.34%	1609	1888	85.22%	-0.79	-1.48
Apr-02	25	28	89.29%	30.93%	1784	2123	84.03%	-0.75	-1.46
May-02	38	44	86.36%	34.32%	1765	2182	80.89%	-0.91	-1.56
Jun-02	35	39	89.74%	30.34%	2040	2419	84.33%	-0.92	-1.56



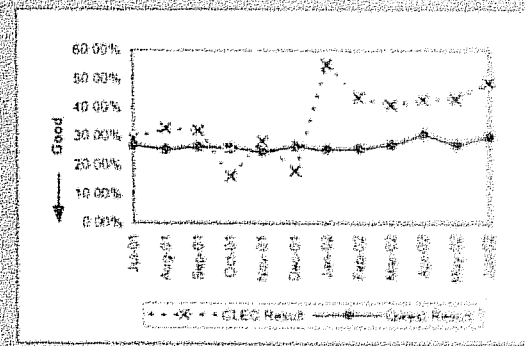
Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	307:22	75	4:06	10:07	8924:17	2800	3:11	1.61	-0.02
Aug-01	188:36	100	1:52	2:50	7872:43	2899	2:43	-2.12	-2.29
Sep-01	87:25	53	1:39	2:05	5430:33	2078	2:37	-1.56	-1.95
Oct-01	175:46	79	2:13	3:01	5384:11	2240	2:24	-0.42	-1.26
Nov-01	78:00	49	1:36	2:02	4584:21	1993	2:18	-1.13	-1.69
Dec-01	51:55	22	2:22	4:28	3914:24	1719	2:17	0.29	-0.82
Jan-02	34:51	38	0:55	1:16	3726:58	1723	2:10	-2.38	-2.45
Feb-02	39:17	32	1:14	1:23	3313:54	1668	1:59	-1.42	-1.86
Mar-02	83:38	39	2:09	3:57	4315:22	1888	2:17	-0.28	-1.17
Apr-02	36:58	28	1:19	1:48	5083:52	2123	2:24	-1.59	-1.97
May-02	77:44	44	1:46	2:30	5995:30	2182	2:45	-1.72	-2.04
Jun-02	65:50	39	1:41	1:54	6061:27	2419	2:30	-1.05	-1.64



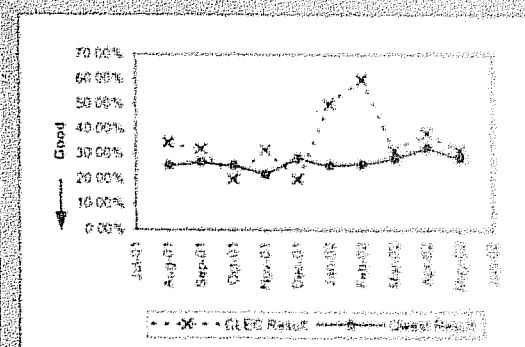
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01	22	75	29.33%	45.53%	753	2800	26.89%	0.48	-0.71
Aug-01	33	100	33.00%	47.02%	744	2899	25.66%	1.62	-0.02
Sep-01	17	53	32.08%	46.68%	550	2078	26.47%	0.91	-0.45
Oct-01	13	79	16.46%	37.08%	587	2240	26.21%	-1.94	-2.18
Nov-01	14	49	28.57%	45.18%	493	1993	24.74%	0.62	-0.62
Dec-01	4	22	18.18%	38.57%	458	1719	26.64%	-0.89	-1.54
Jan-02	21	38	55.26%	49.72%	440	1723	25.54%	3.83	1.74
Feb-02	14	32	43.75%	49.61%	432	1668	25.90%	2.17	0.32
Mar-02	16	39	41.03%	49.19%	513	1888	27.17%	1.85	0.13
Apr-02	12	28	42.86%	49.49%	656	2123	30.90%	1.33	-0.19
May-02	19	44	43.18%	49.53%	595	2182	27.27%	2.25	0.37
Jun-02	19	39	48.72%	49.98%	725	2419	29.97%	2.43	0.48



Repair Repeat Report Rate (Percent) (MR-7E*) (Parity)-- Interval Zone Two

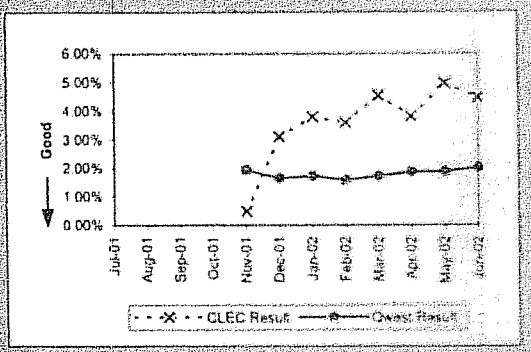
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
Jul-01									
Aug-01	17	49	34.69%	47.60%	481	1882	25.56%	1.41	-0.14
Sep-01	9	28	32.14%	46.70%	353	1323	26.68%	0.65	-0.6
Oct-01	9	45	20.00%	40.00%	349	1369	25.49%	-0.83	-1.51
Nov-01	7	22	31.82%	46.58%	262	1191	22.00%	1.07	-0.35
Dec-01	2	10	20.00%	40.00%	297	1049	28.31%	-0.58	-1.35
Jan-02	7	14	50.00%	50.00%	262	1033	25.36%	1.95	0.19
Feb-02	9	15	60.00%	48.99%	265	1032	26.07%	2.72	0.65
Mar-02	6	19	31.58%	46.48%	344	1222	28.15%	0.35	-0.79
Apr-02	5	13	38.46%	48.65%	467	1431	32.63%	0.45	-0.73
May-02	6	19	31.58%	46.48%	431	1533	28.11%	0.35	-0.79
Jun-02									



Checklist #14 - Resale - DS1 Repair

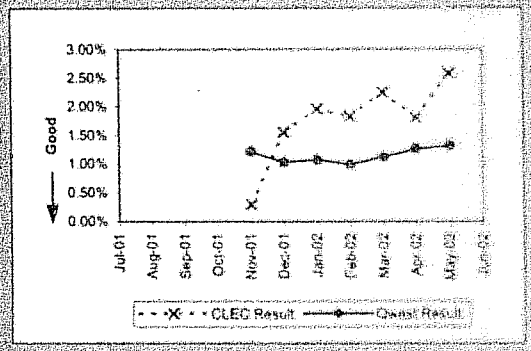
Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01	210	42644	0.49%	7.00%	6182	318019	1.94%	-20.39	-13.39
Dec-01	58	1858	3.12%	17.39%	5280	320210	1.65%	4.97	2.02
Jan-02	72	1892	3.81%	19.13%	5549	322799	1.72%	6.96	3.23
Feb-02	69	1914	3.61%	18.64%	5105	322988	1.58%	7.08	3.3
Mar-02	87	1909	4.56%	20.86%	5519	322151	1.71%	9.55	4.81
Apr-02	78	2044	3.82%	19.16%	6018	321850	1.87%	6.48	2.94
May-02	106	2129	4.98%	21.75%	6075	322674	1.88%	10.48	5.37
Jun-02	98	2194	4.47%	20.66%	6585	325120	2.03%	8.09	3.92



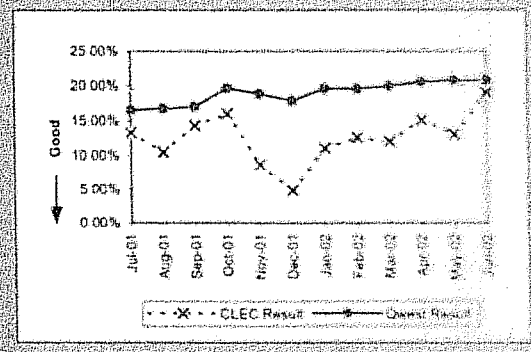
Trouble Rate (Percent) (MR-8*) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01									
Sep-01									
Oct-01									
Nov-01	126	42644	0.30%	5.43%	3875	318019	1.22%	-16.31	-10.92
Dec-01	29	1858	1.56%	12.40%	3305	320210	1.03%	2.25	0.37
Jan-02	37	1892	1.96%	13.85%	3466	322799	1.07%	3.71	1.26
Feb-02	35	1914	1.83%	13.40%	3196	322988	0.99%	3.7	1.25
Mar-02	43	1909	2.25%	14.84%	3623	322151	1.12%	4.66	1.83
Apr-02	37	2044	1.81%	13.33%	4080	321850	1.27%	2.19	0.33
May-02	55	2129	2.58%	15.86%	4263	322674	1.32%	5.08	2.09
Jun-02									



Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)-- Interval Zone One and Two

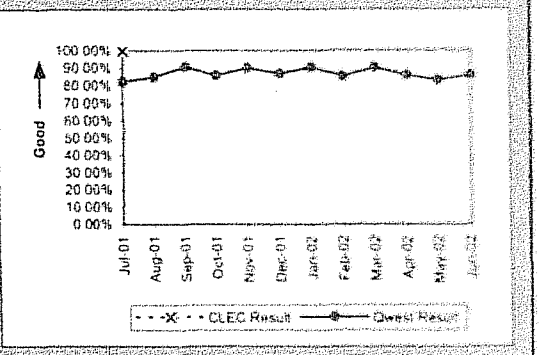
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	28	210	13.33%	33.99%	1560	9438	16.53%	-1.23	-1.75
Aug-01	31	294	10.54%	30.71%	1635	9757	16.76%	-2.81	-2.71
Sep-01	25	174	14.37%	35.08%	1321	7768	17.01%	-0.92	-1.56
Oct-01	35	218	16.06%	36.71%	1740	8860	19.64%	-1.32	-1.8
Nov-01	20	230	8.70%	28.18%	1436	7618	18.85%	-3.88	-3.35
Dec-01	3	61	4.92%	21.62%	1149	6429	17.87%	-2.63	-2.6
Jan-02	9	81	11.11%	31.43%	1351	6900	19.58%	-1.91	-2.16
Feb-02	10	79	12.66%	33.25%	1244	6349	19.59%	-1.54	-1.94
Mar-02	12	99	12.12%	32.64%	1378	6897	19.98%	-1.94	-2.15
Apr-02	14	92	15.22%	35.92%	1559	7577	20.58%	-1.26	-1.77
May-02	16	122	13.11%	33.76%	1597	7672	20.82%	-2.08	-2.26
Jun-02	23	121	19.01%	39.24%	1727	8312	20.78%	-0.48	-1.29



Checklist #14 - Resale - Installation for DS3 and Higher

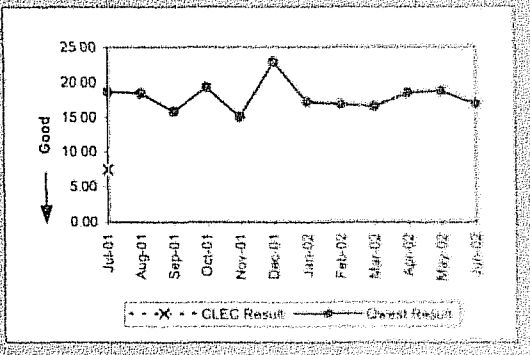
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	2	2	100.00%	0.00%	141	171	82.46%	-0.65	-1.39
Aug-01					140	165	84.85%		
Sep-01					212	233	90.99%		
Oct-01					169	197	85.79%		
Nov-01					156	173	90.17%		
Dec-01					141	162	87.04%		
Jan-02					220	243	90.54%		
Feb-02					118	138	85.51%		
Mar-02					273	302	90.40%		
Apr-02					189	220	85.91%		
May-02					145	174	83.33%		
Jun-02					197	229	86.03%		



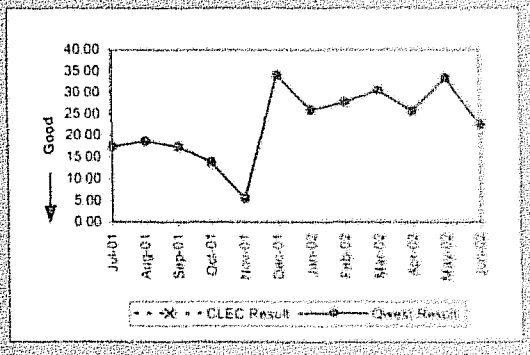
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01	15	2	7.50	0.71	7591	406	18.70	-0.78	-1.47
Aug-01					6486	351	18.48		
Sep-01					7901	498	15.87		
Oct-01					9329	483	19.31		
Nov-01					4724	313	15.09		
Dec-01					6202	271	22.89		
Jan-02					7139	414	17.24		
Feb-02					4336	257	16.87		
Mar-02					7026	424	16.57		
Apr-02					6947	375	18.53		
May-02					6169	328	18.81		
Jun-02					5782	342	16.91		



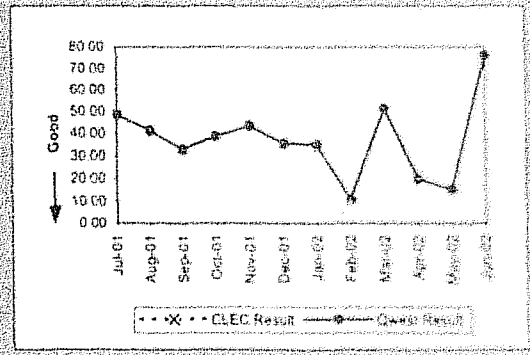
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					1807	104	17.38		
Aug-01					1697	91	18.65		
Sep-01					1513	87	17.39		
Oct-01					1864	135	13.81		
Nov-01					892	161	5.54		
Dec-01					1295	38	34.08		
Jan-02					1162	45	25.82		
Feb-02					910	33	27.58		
Mar-02					1643	54	30.43		
Apr-02					1231	48	25.65		
May-02					1604	48	33.42		
Jun-02					967	43	22.49		



Delayed Days for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

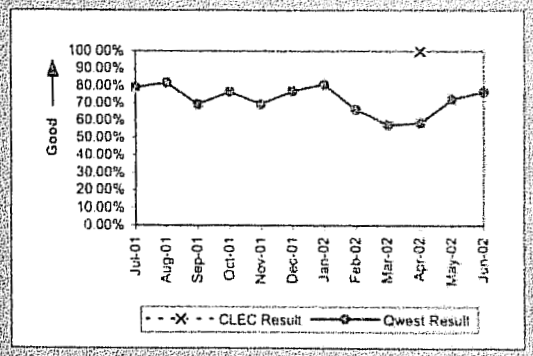
Date	CLEC Num	CLEC Den	CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					291	6	48.50		
Aug-01					248	6	41.33		
Sep-01					263	8	32.88		
Oct-01					388	10	38.80		
Nov-01					217	5	43.40		
Dec-01					107	3	35.67		
Jan-02					70	2	35.00		
Feb-02					11	1	11.00		
Mar-02					102	2	51.00		
Apr-02					60	3	20.00		
May-02					31	2	15.50		
Jun-02					76	1	76.00		



Checklist #14 - Resale - Installation for DS3 and Higher

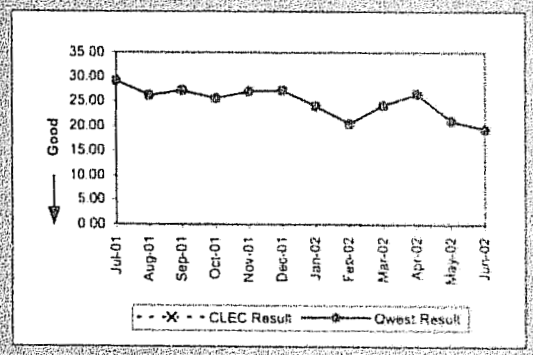
Installation Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Dem	CLEC Result	Std Dev	Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Scr
					34	43	79.07%		
					50	61	81.97%		
					41	59	69.49%		
					56	73	76.71%		
					64	92	69.57%		
					64	83	77.11%		
					68	84	80.95%		
					43	65	66.15%		
					42	73	57.53%		
	1	1	100.00%	0.00%	41	70	58.57%	-0.84	-1.51
					63	87	72.41%		
					76	99	76.77%		



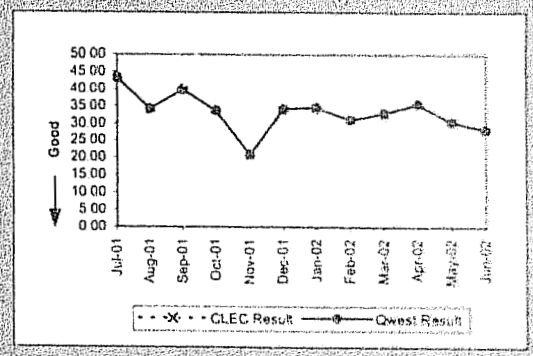
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Dem	CLEC Result	Std Dev	Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Scr
					4543	156	29.12		
					3559	136	26.17		
					3672	135	27.20		
					5137	201	25.56		
					4316	160	26.98		
					3726	137	27.20		
					3554	148	24.01		
					2213	108	20.49		
					3048	126	24.19		
					3839	145	26.48		
					3297	157	21.00		
					2926	151	19.38		



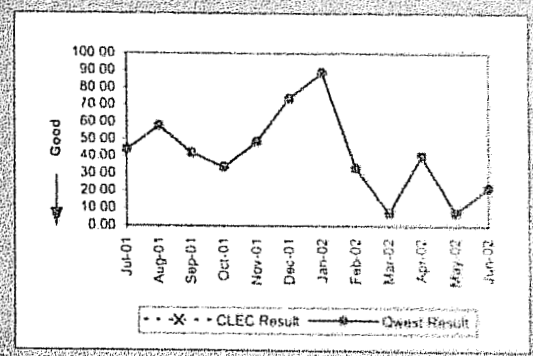
Delayed Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Dem	CLEC Result	Std Dev	Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Scr
					2248	52	43.23		
					1506	44	34.23		
					1516	38	39.89		
					2261	67	33.75		
					1841	88	20.92		
					1168	34	34.35		
					900	26	34.62		
					841	27	31.15		
					1551	47	33.00		
					1752	49	35.76		
					1037	34	30.50		
					986	35	28.17		



Delayed Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

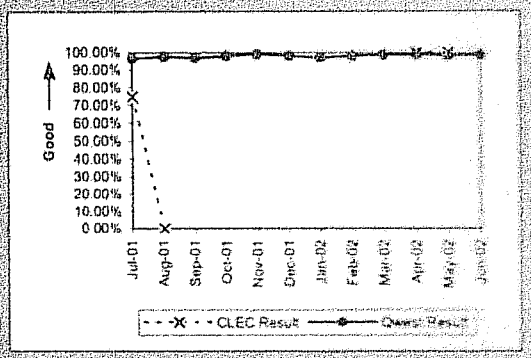
Date	CLEC Num	CLEC Dem	CLEC Result	Std Dev	Qwest Num	Qwest Dem	Qwest Result	Mod Z Scr	Parity Scr
					264	6	44.00		
					347	6	57.83		
					337	8	42.12		
					202	6	33.67		
					537	11	48.82		
					370	5	74.00		
					356	4	89.00		
					67	2	33.50		
					15	2	7.50		
					121	3	40.33		
					15	2	7.50		
					44	2	22.00		



Checklist #14 - Resale - Installation for DS3 and Higher

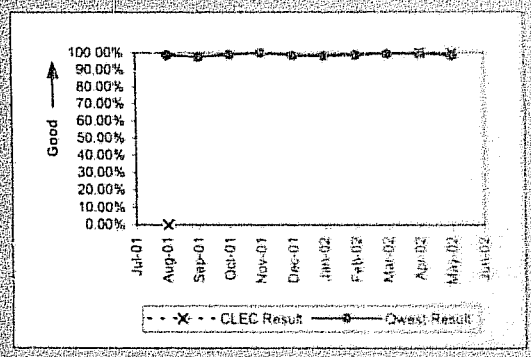
New Service Installation Quality (Percent) (OP-5) (Parity)– Interval Zone One and Two

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	3	4	75.00%	43.30%	529	547	96.71%	1.5	-0.09
	0	1	0.00%	0.00%	524	536	97.76%	2.28	0.39
					559	576	97.05%		
					675	689	97.97%		
					604	609	99.18%		
					445	454	98.02%		
					488	502	97.21%		
					467	476	98.11%		
					460	467	98.50%		
	1	1	100.00%	0.00%	537	544	98.71%	-0.11	-1.07
	1	1	100.00%	0.00%	500	510	98.04%	-0.14	-1.09
					488	496	98.39%		



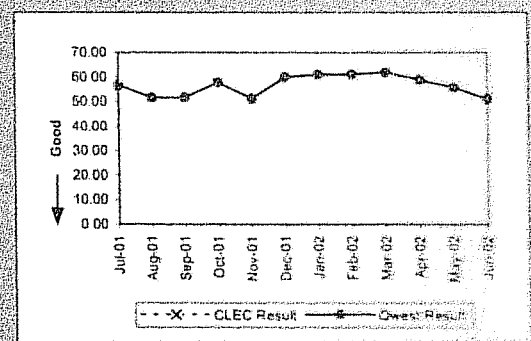
New Service Installation Quality (Percent) (OP-5") (Parity)-- Interval Zone One and Two

	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
	0	1	0.00%	0.00%	528	536	98.51%	2.42	0.47
					562	576	97.57%		
					680	689	98.69%		
					607	609	99.67%		
					446	454	98.24%		
					492	502	98.01%		
					469	476	98.53%		
					463	467	99.14%		
	1	1	100.00%	0.00%	540	544	99.26%	-0.09	-1.05
	1	1	100.00%	0.00%	500	510	98.04%	-0.14	-1.09



Missed Repair Appointments Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

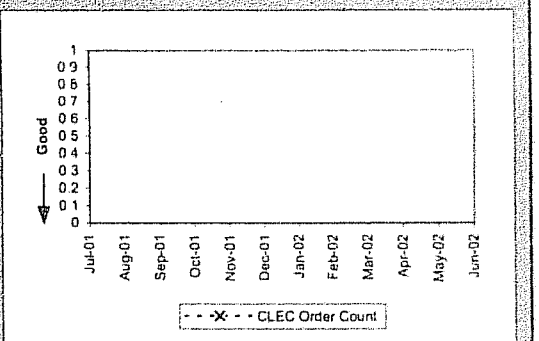
	CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
					12089	213	56.76		
					12347	239	51.66		
					12570	243	51.73		
					12903	223	57.86		
					11028	215	51.29		
					10041	167	60.13		
					10005	164	61.01		
					9674	158	61.23		
					9604	155	61.96		
					10246	174	58.89		
					10730	192	55.89		
					11437	224	51.06		



Checklist #14 - Resale - Installation for DS3 and Higher

Count of Pending Orders Delayed for Facilities Reasons DS3 (OP-15B) (Diagnostic)

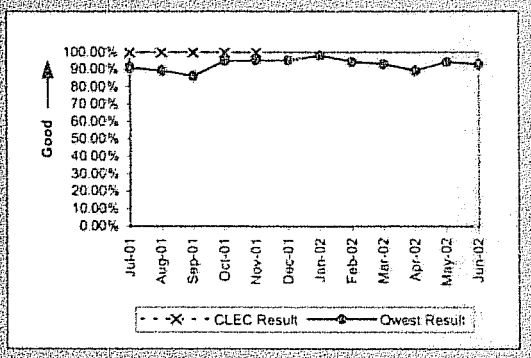
	CLEC Order Count
Jul-01	
Aug-01	
Sep-01	
Oct-01	
Nov-01	
Dec-01	
Jan-02	
Feb-02	
Mar-02	
Apr-02	
May-02	
Jun-02	



Checklist #14 - Resale - Repair for DS3 and Higher

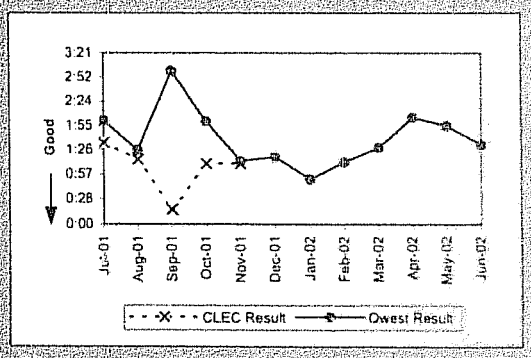
Percent Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

			CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
		1	100.00%	0.00%	90	99	90.91%	-0.31	-1.19
		4	100.00%	0.00%	101	113	89.38%	-0.68	-1.41
		6	100.00%	0.00%	133	154	86.36%	-0.95	-1.58
		5	100.00%	0.00%	128	135	94.81%	-0.51	-1.31
		5	100.00%	0.00%	121	127	95.28%	-0.49	-1.3
					98	103	95.15%		
					116	118	98.31%		
					83	88	94.32%		
					95	102	93.14%		
					101	113	89.38%		
					100	106	94.34%		
					106	114	92.98%		



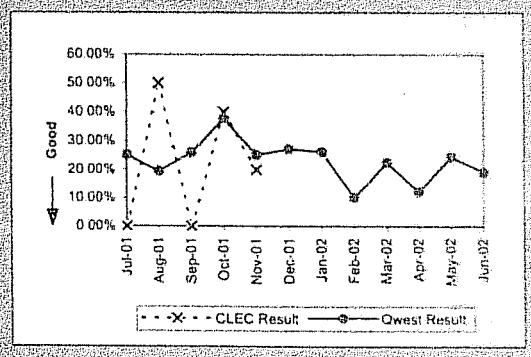
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

			CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
		1	1:35		199:17	99	2:01	-0.13	-1.08
		4	1:15	0:50	161:41	113	1:26	-0.18	-1.11
		6	0:12	0:16	461:47	154	3:00	-0.93	-1.57
		5	1:10	1:31	270:13	135	2:00	-0.27	-1.17
		5	1:10	0:41	154:42	127	1:13	-0.08	-1.05
					134:43	103	1:18		
					101:44	118	0:52		
					108:00	88	1:12		
					151:40	102	1:29		
					205:19	113	2:05		
					202:45	106	1:55		
					175:54	114	1:33		



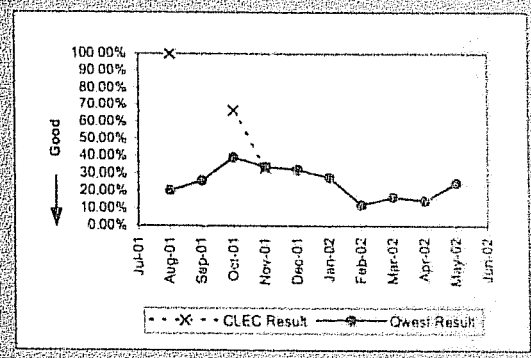
Repeat Repair Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

			CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
		1	0.00%	0.00%	25	99	25.25%	-0.58	-1.35
		4	50.00%	50.00%	22	113	19.47%	1.28	-0.22
		6	0.00%	0.00%	40	154	25.97%	-1.42	-1.87
		5	40.00%	48.99%	51	135	37.78%	0.09	-0.94
		5	20.00%	40.00%	32	127	25.20%	-0.26	-1.16
					28	103	27.18%		
					31	118	26.27%		
					9	88	10.23%		
					23	102	22.55%		
					14	113	12.39%		
					26	106	24.53%		
					22	114	19.30%		



Repeat Repair Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

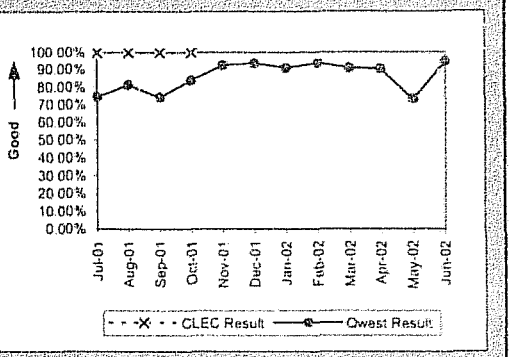
			CLEC Resu	Std Dev	Qwest Num	Qwest Den	Qwest Resu	Mod Z Scr	Parity Scr
		1	100.00%	0.00%	14	69	20.29%	1.27	-0.23
					24	93	25.81%		
		3	66.67%	47.14%	27	69	39.13%	0.83	-0.5
		3	33.33%	47.14%	23	68	33.82%	-0.02	-1.01
					20	62	32.26%		
					17	61	27.87%		
					6	50	12.00%		
					9	55	16.36%		
					9	62	14.52%		
					14	57	24.56%		



Checklist #14 - Resale - Repair for DS3 and Higher

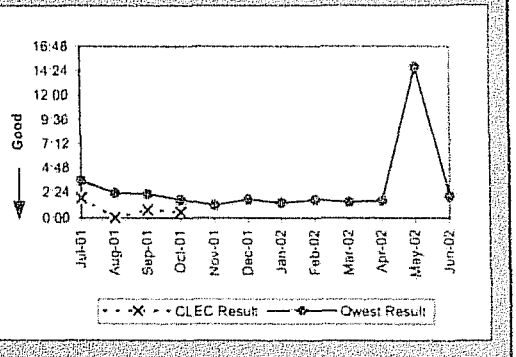
Repair Repeat Report Percent (MR 7) (Parity) - Interval Zone Two

Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
38	51	74.51%	-0.58	-1.35
35	43	81.40%	-0.47	-1.29
29	39	74.36%	-0.81	-1.49
31	37	83.78%	-0.43	-1.28
25	27	92.59%		
29	31	93.55%		
50	55	90.91%		
28	31	90.32%		
30	33	90.91%		
37	41	90.24%		
34	37	91.89%		
34	36	94.44%		



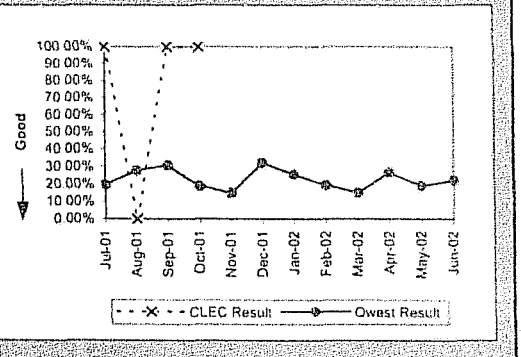
Repair Repeat Report Percent (MR 7) (Parity) - Interval Zone Two

Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
169.92	51	3.33	-0.36	-1.22
105.06	43	2.22	-1.3	-1.79
82.79	39	2.15	-1.1	-1.67
53.25	37	1.43	-0.63	-1.38
33.86	27	1.14		
54.56	31	1.46		
76.93	55	1.28		
53.16	31	1.43		
50.37	33	1.32		
66.62	41	1.38		
546.24	37	14.46		
73.19	36	3.02		



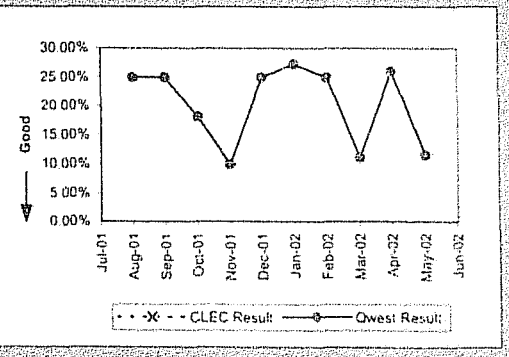
Repair Repeat Report Percent (MR 7E) (Parity) - Interval Zone Two

Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
10	51	19.61%	1.28	-0.22
12	43	27.91%	-0.62	-1.37
12	39	30.77%	1.68	0.02
7	37	18.92%	1.29	-0.22
4	27	14.81%		
10	31	32.26%		
14	55	25.45%		
6	31	19.35%		
5	33	15.15%		
11	41	26.83%		
7	37	18.92%		
8	36	22.22%		



Repair Repeat Report Percent (MR 7E) (Parity) - Interval Zone Two

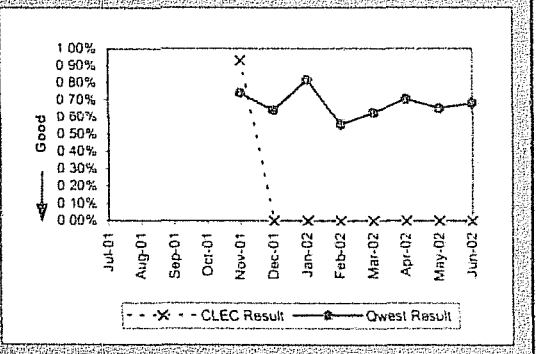
Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
9	36	25.00%		
7	28	25.00%		
4	22	18.18%		
1	10	10.00%		
4	16	25.00%		
9	33	27.27%		
5	20	25.00%		
2	18	11.11%		
6	23	26.09%		
3	26	11.54%		



Checklist #14 - Resale - Repair for DS3 and Higher

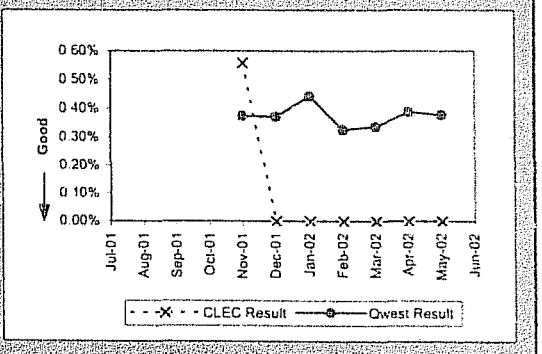
Trouble Rate Percent (MR-8) (Parity) -- Interval Zone One and Two

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				154	20806	0.74%	0.51	-0.69
				134	21020	0.64%	-0.16	-1.1
				173	21223	0.82%	-0.22	-1.13
				119	21400	0.56%	-0.18	-1.11
				135	21641	0.62%	-0.21	-1.13
				154	21880	0.70%	-0.24	-1.14
				143	21962	0.65%	-0.23	-1.14
				150	22094	0.68%	-0.27	-1.17



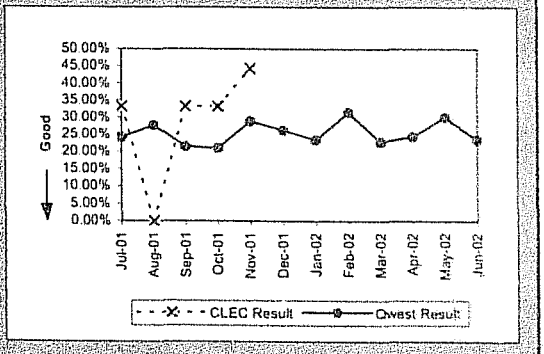
Trouble Rate Percent (MR-8) (Parity) -- Interval Zone One and Two

				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				78	20806	0.37%	0.69	-0.58
				78	21020	0.37%	-0.12	-1.07
				94	21223	0.44%	-0.16	-1.1
				70	21400	0.33%	-0.14	-1.09
				73	21641	0.34%	-0.15	-1.09
				85	21880	0.39%	-0.18	-1.11
				83	21962	0.38%	-0.17	-1.11



Trouble Report Percent Repeat Trouble Reports (Percent) (MR-10) (Diagnostic) -- Interval Zone One and Two

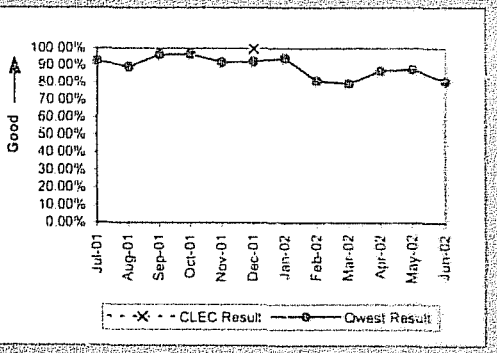
				Qwest Num	Qwest Den	Qwest Res	Mod Z Scr	Parity Scr
				48	198	24.24%	0.34	-0.79
				60	216	27.78%	-1.37	-1.83
				53	246	21.54%	0.93	-0.43
				46	218	21.10%	0.84	-0.49
				63	217	29.03%	0.95	-0.42
				48	182	26.37%		
				53	226	23.45%		
				55	174	31.61%		
				40	175	22.86%		
				50	204	24.51%		
				62	205	30.24%		
				46	196	23.47%		



Checklist #14 - Resale - Frame Relay Installation

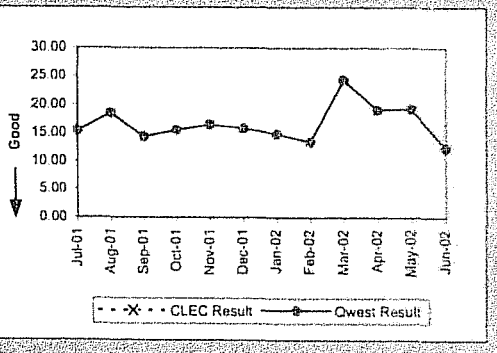
Installation Commitments Met (Percent) (OP-3D) (Parity)-- Interval Zone One

CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				656	707	92.79%		
				411	460	89.35%		
				811	843	96.20%		
				691	715	96.64%		
				575	625	92.00%		
1	1	100.00%	0.00%	387	419	92.36%	-0.29	-1.17
				460	488	94.26%		
				450	555	81.08%		
				428	530	79.41%		
				436	502	86.85%		
				639	726	87.77%		
				491	608	80.76%		



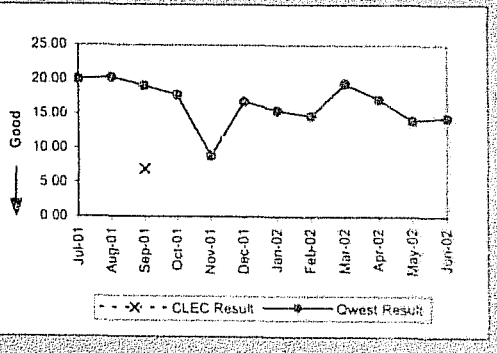
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				464	30	15.47		
				407	22	18.50		
				260	18	14.44		
				327	21	15.57		
				182	11	16.55		
				159	10	15.90		
				239	16	14.94		
				243	18	13.50		
				561	23	24.39		
				230	12	19.17		
				426	22	19.36		
				186	15	12.40		



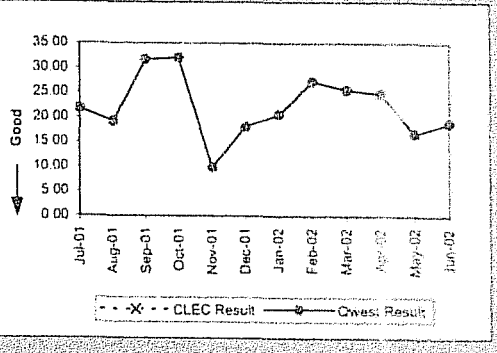
Installation Delays for Facility Reasons (Average Days) (OP-6A-4) (Parity)-- Interval Zone One

CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				2487	124	20.06		
				2191	108	20.29		
94	3	7.00	1.41	3494	183	19.09	-0.8	-1.49
				3196	180	17.76		
				1796	202	8.90		
				1578	94	16.79		
				1840	119	15.46		
				1701	116	14.66		
				2329	120	19.41		
				1184	69	17.16		
				1421	101	14.07		
				1732	120	14.43		



Installation Delays for Facility Reasons (Average Days) (OP-6B-4) (Parity)-- Interval Zone One

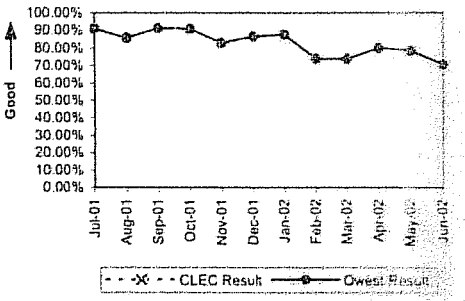
CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				521	24	21.71		
				459	24	19.12		
				444	14	31.71		
				320	10	32.00		
				177	18	9.83		
				272	15	18.13		
				185	9	20.56		
				218	8	27.25		
				153	6	25.50		
				198	8	24.75		
				167	10	16.70		
				189	10	18.90		



Checklist #14 - Resale - Frame Relay Installation

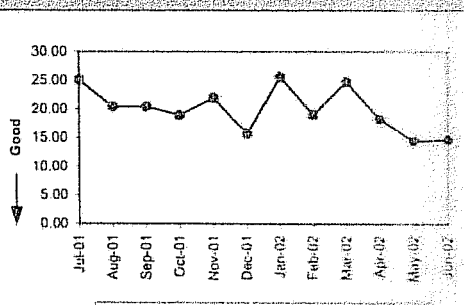
Percent Commitments Met (Percent) (OP-3E) (Parity)-- Interval Zone Two

				CLEC Result	Std Dev	Qwest Numerator	Qwest Denominator	Qwest Result	Mod Z Scr	Parity Scr
						788	864	91.20%		
						403	469	85.93%		
						553	604	91.56%		
						491	539	91.09%		
						361	434	83.18%		
						292	336	86.90%		
						374	426	87.79%		
						414	557	74.33%		
						438	591	74.11%		
						438	545	80.37%		
						509	646	78.79%		
						425	601	70.88%		



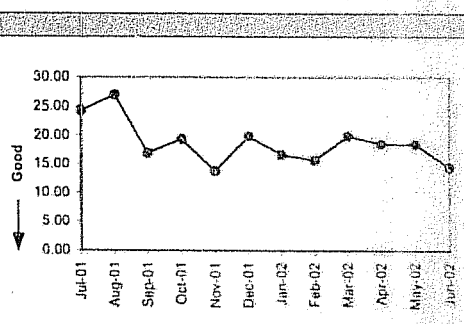
Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

				CLEC Result	Std Dev	Qwest Numerator	Qwest Denominator	Qwest Result	Mod Z Scr	Parity Scr
						580	23	25.22		
						922	45	20.49		
						799	39	20.49		
						494	26	19.00		
						506	23	22.00		
						315	20	15.75		
						438	17	25.76		
						419	22	19.05		
						720	29	24.83		
						128	7	18.29		
						448	31	14.45		
						383	26	14.73		



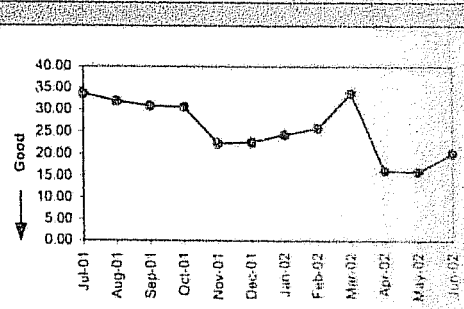
Average Days for Non-Facility Reasons (Average Days) (OP-6A-5) (Parity)-- Interval Zone Two

				CLEC Result	Std Dev	Qwest Numerator	Qwest Denominator	Qwest Result	Mod Z Scr	Parity Scr
						3503	144	24.33		
						2756	102	27.02		
						2966	175	16.95		
						3111	160	19.44		
						2603	188	13.85		
						1950	98	19.90		
						2312	139	16.63		
						2186	139	15.73		
						3131	157	19.94		
						2226	120	18.55		
						2687	145	18.53		
						2368	163	14.53		



Average Days for Facility Reasons (Average Days) (OP-6B-5) (Parity)-- Interval Zone Two

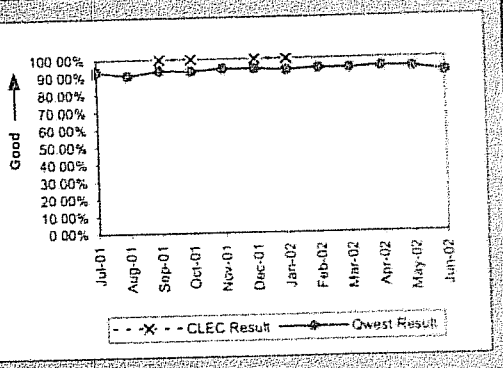
				CLEC Result	Std Dev	Qwest Numerator	Qwest Denominator	Qwest Result	Mod Z Scr	Parity Scr
						809	24	33.71		
						1118	35	31.94		
						802	26	30.85		
						765	25	30.60		
						471	21	22.43		
						294	13	22.62		
						316	13	24.31		
						386	15	25.73		
						540	16	33.75		
						98	6	16.33		
						112	7	16.00		
						342	17	20.12		



Checklist #14 - Resale - Frame Relay Installation

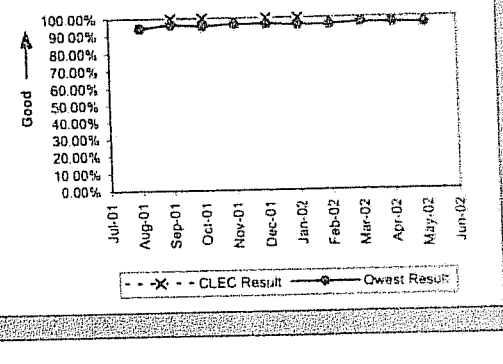
[illegible] (Percent) (OP-5) (Parity) – Interval Zone One and Two

CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				1666	1787	93.23%		
				1463	1607	91.04%		
1	1	100.00%	0.00%	1562	1667	93.70%	-0.26	-1.16
1	1	100.00%	0.00%	1790	1922	93.13%	-0.27	-1.17
				1483	1568	94.58%		
1	1	100.00%	0.00%	1103	1170	94.27%	-0.25	-1.15
1	1	100.00%	0.00%	1043	1117	93.38%	-0.27	-1.16
				1171	1240	94.44%		
				1164	1237	94.10%		
				1140	1200	95.00%		
				1256	1329	94.51%		
				1314	1430	91.89%		



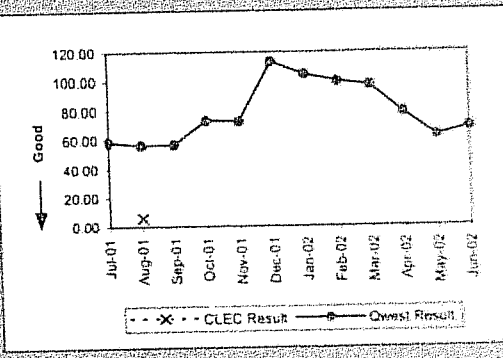
[illegible] (Percent) (OP-5) (Parity) – Interval Zone One and Two

CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				1515	1607	94.28%		
1	1	100.00%	0.00%	1609	1667	96.52%	-0.19	-1.12
1	1	100.00%	0.00%	1833	1922	95.37%	-0.22	-1.13
				1513	1568	96.49%		
1	1	100.00%	0.00%	1131	1170	96.67%	-0.19	-1.11
1	1	100.00%	0.00%	1070	1117	95.79%	-0.21	-1.13
				1189	1240	95.89%		
				1198	1237	96.85%		
				1160	1200	96.67%		
				1277	1329	96.09%		



[illegible] Delayed Past Due Date (Average Days) (OP-15A) (Diagnostic)

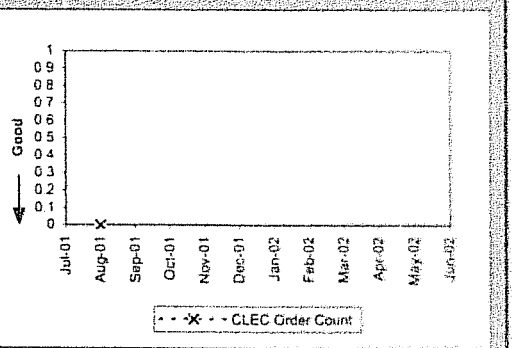
CLEC Num	CLEC Den	CLEC Result	Std Dev	Qwest Num	Qwest Den	Qwest Result	Mod Z Scr	Parity Scr
				22859	389	58.76		
1	1	0.00		25375	449	56.51	-0.64	-1.39
				23177	406	57.09		
				24264	330	73.53		
				24952	342	72.96		
				21160	187	113.16		
				23563	225	104.72		
				24230	243	99.71		
				22668	233	97.29		
				22616	290	78.68		
				22028	351	62.76		
				22355	326	68.57		



Checklist #14 - Resale - Frame Relay Installation

Number of Pending Orders Delayed for Facilities Reasons Frame Relay (OP-15B) (Diagnostic)

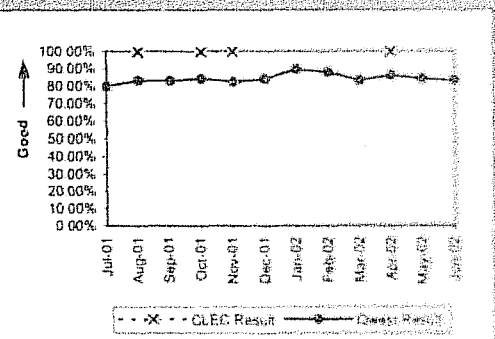
Date	CLEC Order Count
Jul-01	
Aug-01	0
Sep-01	
Oct-01	
Nov-01	
Dec-01	
Jan-02	
Feb-02	
Mar-02	
Apr-02	
May-02	
Jun-02	



Checklist #14 - Resale - Frame Relay Repair

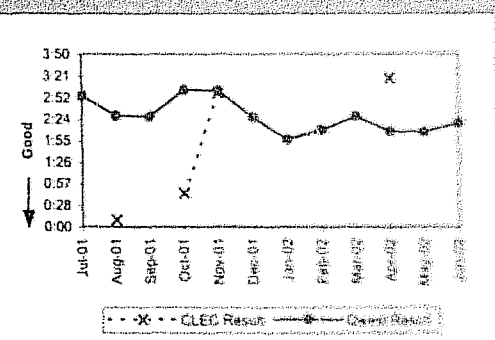
All Troubles Cleared within 4 hours (Percent) (MR-5A) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]					875	1094	79.98%		
[illegible]	1	1	100.00%	0.00%	975	1168	83.48%	-0.44	-1.27
[illegible]					713	856	83.29%		
[illegible]	1	1	100.00%	0.00%	806	955	84.40%	-0.43	-1.26
[illegible]	1	1	100.00%	0.00%	710	861	82.46%	-0.46	-1.28
[illegible]					683	811	84.22%		
[illegible]					729	812	89.78%		
[illegible]					626	710	88.17%		
[illegible]					625	750	83.33%		
[illegible]	1	1	100.00%	0.00%	687	795	86.42%	-0.4	-1.24
[illegible]					669	795	84.15%		
[illegible]					788	945	83.39%		



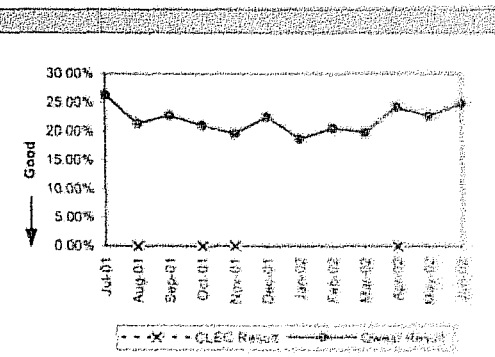
Mean Time to Restore (Hours:Minutes) (MR-6D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]					3202:57	1094	2:56		
[illegible]	0:10	1	0:10		2906:46	1168	2:29	-0.55	-1.33
[illegible]					2116:31	856	2:28		
[illegible]	0:45	1	0:45		2925:14	955	3:04	-0.25	-1.15
[illegible]	2:59	1	2:59		2617:08	861	3:02	-0.01	-1
[illegible]					1987:34	811	2:27		
[illegible]					1586:16	812	1:57		
[illegible]					1537:16	710	2:10		
[illegible]					1845:20	750	2:28		
[illegible]	3:19	1	3:19		1691:56	795	2:08	0.9	-0.45
[illegible]					1679:33	795	2:07		
[illegible]					2192:43	945	2:19		



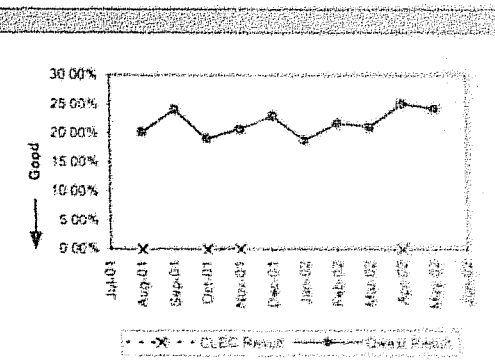
Repair Repeat Report Rate (Percent) (MR-7D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]					288	1094	26.33%		
[illegible]	0	1	0.00%	0.00%	250	1168	21.40%	-0.52	-1.32
[illegible]					195	856	22.78%		
[illegible]	0	1	0.00%	0.00%	201	955	21.05%	-0.52	-1.31
[illegible]	0	1	0.00%	0.00%	169	861	19.63%	-0.49	-1.3
[illegible]					183	811	22.56%		
[illegible]					152	812	18.72%		
[illegible]					146	710	20.56%		
[illegible]					149	750	19.87%		
[illegible]	0	1	0.00%	0.00%	193	795	24.28%	-0.57	-1.34
[illegible]					180	795	22.64%		
[illegible]					234	945	24.76%		



Repair Repeat Report Rate (Percent) (MR-7D*) (Parity)-- Interval Zone One

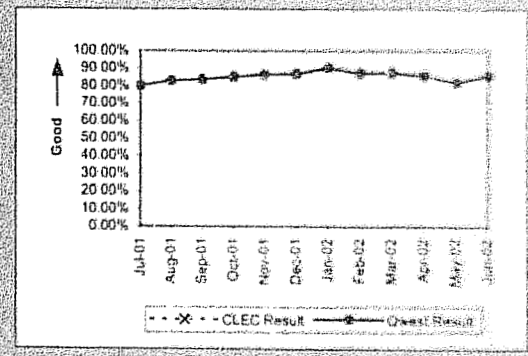
Date	CLEC Num	CLEC Denom	CLEC Result	Std Dev	Qwest Num	Qwest Denom	Qwest Result	Mod Z Scr	Parity Scr
[illegible]									
[illegible]	0	1	0.00%	0.00%	151	748	20.19%	-0.5	-1.31
[illegible]					132	549	24.04%		
[illegible]	0	1	0.00%	0.00%	118	616	19.16%	-0.49	-1.3
[illegible]	0	1	0.00%	0.00%	114	553	20.61%	-0.51	-1.31
[illegible]					118	512	23.05%		
[illegible]					93	495	18.79%		
[illegible]					101	463	21.81%		
[illegible]					105	498	21.08%		
[illegible]	0	1	0.00%	0.00%	132	526	25.10%	-0.58	-1.35
[illegible]					135	558	24.19%		



Checklist #14 - Resale - Frame Relay Repair

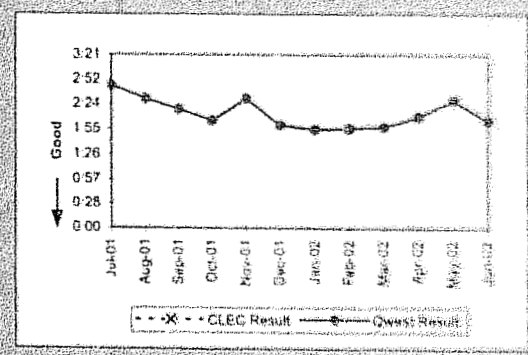
All Troubles Cleared within 4 hours (Percent) (MR-5B) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					823	1026	80.21%		
Aug-01					838	1009	83.05%		
Sep-01					664	793	83.73%		
Oct-01					732	859	85.22%		
Nov-01					588	680	86.47%		
Dec-01					609	700	87.00%		
Jan-02					607	671	90.46%		
Feb-02					518	594	87.21%		
Mar-02					558	637	87.60%		
Apr-02					597	695	85.90%		
May-02					615	749	82.11%		
Jun-02					756	879	86.01%		



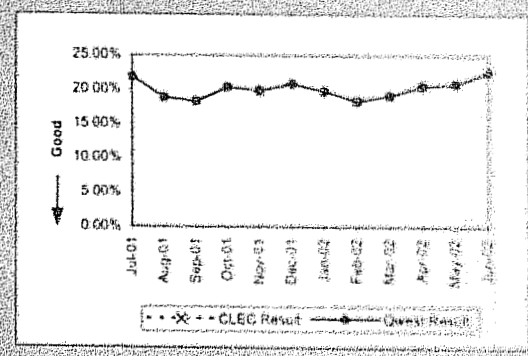
Mean Time to Restore (Hours:Minutes) (MR-6E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					2831:11	1026	2:46		
Aug-01					2518:49	1009	2:30		
Sep-01					1828:54	793	2:18		
Oct-01					1794:29	859	2:05		
Nov-01					1711:44	680	2:31		
Dec-01					1404:02	700	2:00		
Jan-02					1283:57	671	1:55		
Feb-02					1149:24	594	1:56		
Mar-02					1248:13	637	1:58		
Apr-02					1505:20	695	2:10		
May-02					1855:25	749	2:29		
Jun-02					1835:55	879	2:05		



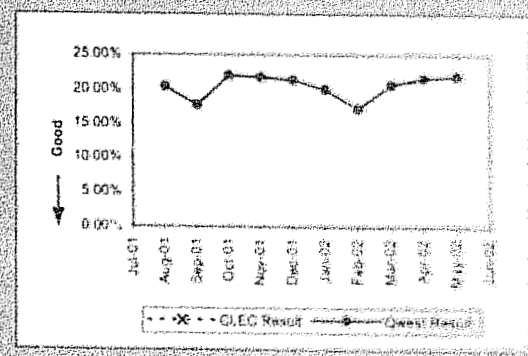
Repair Repeat Report Rate (Percent) (MR-7E) (Parity)-- Interval Zone Two

Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01					224	1026	21.83%		
Aug-01					190	1009	18.83%		
Sep-01					145	793	18.29%		
Oct-01					175	859	20.37%		
Nov-01					135	680	19.85%		
Dec-01					146	700	20.86%		
Jan-02					133	671	19.82%		
Feb-02					109	594	18.35%		
Mar-02					122	637	19.15%		
Apr-02					143	695	20.58%		
May-02					156	749	20.83%		
Jun-02					199	879	22.64%		



Repair Repeat Report Rate (Percent) (MR-7E*) (Parity)-- Interval Zone Two

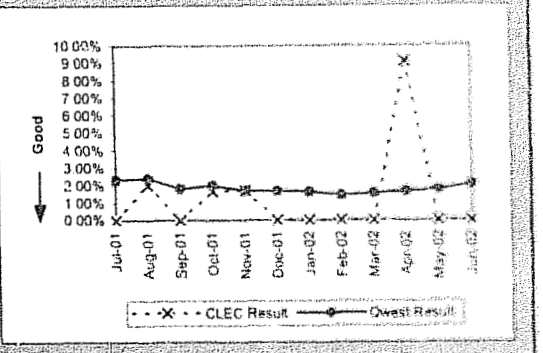
Date	CLEC Num	CLEC Deno	CLEC Resu	Std Dev	Qwest Num	Qwest Deno	Qwest Resu	Mod Z Scr	Parity Scr
Jul-01									
Aug-01					123	603	20.40%		
Sep-01					87	491	17.72%		
Oct-01					114	518	22.01%		
Nov-01					84	386	21.76%		
Dec-01					87	406	21.43%		
Jan-02					76	379	20.05%		
Feb-02					64	371	17.25%		
Mar-02					78	378	20.63%		
Apr-02					97	448	21.65%		
May-02					112	509	22.00%		
Jun-02									



Checklist #14 - Resale - Frame Relay Repair

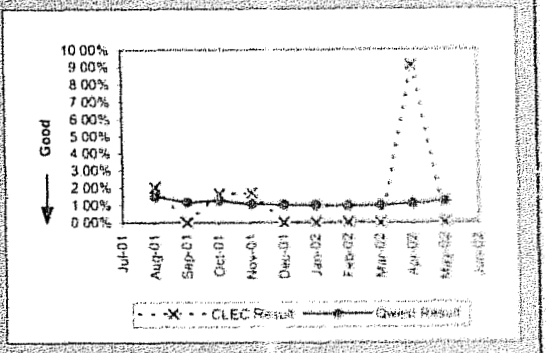
Trouble Rate (Percent) (MR-8) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Rest	Std Dev	Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Scr
[illegible]	0	51	0 00%	0 00%	2120	90328	2 35%	-1 11	-1 67
[illegible]	1	49	2 04%	14 14%	2177	90443	2 41%	-0 17	-1 1
[illegible]	0	52	0 00%	0 00%	1649	90462	1 82%	-0 98	-1 6
[illegible]	1	60	1 67%	12 80%	1814	90466	2 01%	-0 19	-1 11
[illegible]	1	59	1 69%	12 91%	1541	90265	1 71%	-0 01	-1
[illegible]	0	9	0 00%	0 00%	1511	90053	1 68%	-0 39	-1 24
[illegible]	0	9	0 00%	0 00%	1483	90040	1 65%	-0 39	-1 24
[illegible]	0	9	0 00%	0 00%	1304	90317	1 44%	-0 36	-1 22
[illegible]	0	10	0 00%	0 00%	1387	89687	1 55%	-0 4	-1 24
[illegible]	1	11	9 09%	28 75%	1490	89095	1 67%	1 33	-0 19
[illegible]	0	12	0 00%	0 00%	1544	88711	1 74%	-0 46	-1 28
[illegible]	0	13	0 00%	0 00%	1824	88068	2 07%	-0 52	-1 32



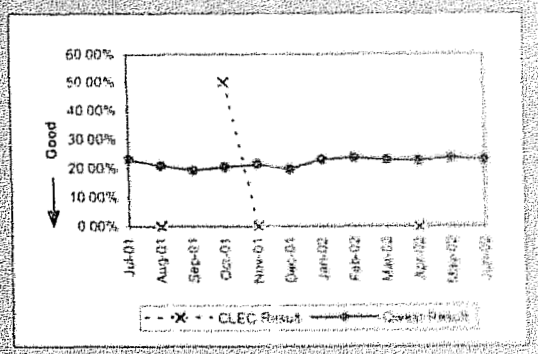
Trouble Rate (Percent) (MR-8*) (Parity)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Rest	Std Dev	Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Scr
[illegible]									
[illegible]	1	49	2 04%	14 14%	1351	90443	1 49%	0 4	-0 76
[illegible]	0	52	0 00%	0 00%	1040	90462	1 15%	-0 78	-1 47
[illegible]	1	60	1 67%	12 80%	1134	90466	1 25%	0 37	-0 77
[illegible]	1	59	1 69%	12 91%	939	90265	1 04%	0 54	-0 67
[illegible]	0	9	0 00%	0 00%	918	90053	1 02%	-0 3	-1 19
[illegible]	0	9	0 00%	0 00%	874	90040	0 97%	-0 3	-1 18
[illegible]	0	9	0 00%	0 00%	834	90317	0 92%	-0 29	-1 18
[illegible]	0	10	0 00%	0 00%	876	89687	0 98%	-0 31	-1 19
[illegible]	1	11	9 09%	28 75%	974	89095	1 09%	1 56	-0 05
[illegible]	0	12	0 00%	0 00%	1067	88711	1 20%	-0 38	-1 23
[illegible]									



Customer and Non-Qwest Related Trouble Reports (Percent) (MR-10) (Diagnostic)-- Interval Zone One and Two

Date	CLEC Num	CLEC Den	CLEC Rest	Std Dev	Qwest Num	Qwest Den	Qwest Rest	Mod Z Scr	Parity Scr
[illegible]					633	2753	22 99%		
[illegible]	0	1	0 00%	0 00%	576	2753	20 92%	-0 51	-1 31
[illegible]					394	2043	19 29%		
[illegible]	1	2	50 00%	50 00%	467	2281	20 47%	0 82	-0 5
[illegible]	0	1	0 00%	0 00%	420	1961	21 42%	-0 52	-1 32
[illegible]					370	1881	19 67%		
[illegible]					444	1927	23 04%		
[illegible]					404	1708	23 65%		
[illegible]					414	1801	22 99%		
[illegible]	0	1	0 00%	0 00%	438	1928	22 72%	-0 54	-1 33
[illegible]					477	2021	23 60%		
[illegible]					543	2367	22 94%		



CONTINUATION

[10]

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STOEL RIVES LLP
ATTORNEYS AT LAW

RECEIVED
JUL 24 2002
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

101 S. Capitol Boulevard, Suite 1900
Boise, Idaho 83702
main 208.389.9000
fax 208.389.9040
www.stoel.com

Mark S. Hooker
Direct (208) 387-4277
mshooker@stoel.com

July 23, 2002

VIA OVERNIGHT DELIVERY
VIA EMAIL

Jim Burg, Chairman
Public Utilities Commission
Capitol Building, 1st floor
500 East Capitol Avenue
Pierre, SD 57501-5070

Pam Nelson, Commissioner
Public Utilities Commission
Capitol Building, 1st floor
500 East Capitol Avenue
Pierre, SD 57501-5070

Bob Sahr, Commissioner
Public Utilities Commission
Capitol Building, 1st floor
500 East Capitol Avenue
Pierre, SD 57501-5070

RE: Docket # TC01-165
In the Matter of the Analysis into Qwest Corporation's Compliance with Section 271(c) of the Telecommunications Act of 1996

Dear Chairman Burg and Commissioners:

Pursuant to the Commission's procedural order, a hearing was held on July 11, 2002, on the ROC OSS test results. At the close of the hearing, the participating parties discussed the possibility that it would not be necessary to file post-hearing briefs concerning the OSS testing phase of the section 271 case. Qwest indicated at that time that it would file a post-hearing brief only if necessary to respond to issues raised by the Commission Staff or the Intervenors in their post-hearing briefs.

Oregon
Washington
California
Utah
Idaho

The Commission's amended procedural schedule established July 22 as the filing deadline for Staff and Intervenor briefs on OSS testing. Qwest has confirmed that no briefs were filed. Consequently, Qwest does not intend to file a brief and the case can be considered fully submitted.

Qwest wishes to thank the Commission and the participants for their careful consideration of the issues presented in this section 271 docket.

Very truly yours,

Mary S. Hobson

MSH:blg

cc: Rolayne Ailts Wiest via email to rolayne.wiest@state.sd.us
Harlan Best via email to harlan.best@state.sd.us
Karen Cremer via email to karen.cremer@state.sd.us
Warren R. Fischer via email to wfischer@qsiconsulting.com
Mark Stacy via email to mstacy@wyoming.com
Marlon "Buster" Griffing PhD bgriffing@qsiconsulting.com
David A. Gerdes via email to dag@magt.com
Linden Evans via U.S. Mail
Steven H. Weigler via email to weigler@lga.att.com
John S. Lovald via email to melmmaher@aol.com

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE ANALYSIS OF QWEST CORPORATION'S COMPLIANCE WITH SECTION 271(c) OF THE TELECOMMUNICATIONS ACT OF 1996	)))))	PROCEDURAL HISTORY; ORDER REGARDING CHECKLIST ITEMS 3, 7, 8, 9, 10, AND 12 TC01-165

PROCEDURAL HISTORY

On October 25, 2001, Qwest Corporation ("Qwest") filed with the South Dakota Public Utilities Commission ("Commission") a Petition for Commission Recommendation that the Federal Communications Commission Grant Qwest Corporation Entry into the In-Region InterLATA Market Under Section 271 of the Telecommunications Act Of 1996. Specifically, Qwest requested that this Commission find that Qwest has met the competitive checklist and other requirements of 47 U.S.C. section 271, which prescribe the mechanism by which Qwest may be found eligible to provide in-region, interLATA services. Qwest requested that the Commission provide a favorable recommendation to the Federal Communications Commission (FCC). In support of its petition, Qwest submitted 25 affidavits, a revised Statement of Generally Available Terms ("SGAT"), and seven reports submitted in the Multi-state Proceeding.

On November 1, 2001, the Commission electronically transmitted notice of the filing and the intervention deadline of November 16, 2001, to interested individuals and entities. A Petition for Leave to Intervene was received from Black Hills FiberCom, L.L.C. ("Black Hills FiberCom" or "FiberCom") on November 7, 2001; a Petition to Intervene was received from Midcontinent Communications ("Midcontinent") on November 9, 2001; and a Petition for Leave to Intervene was received from AT&T Communications of the Midwest, Inc. ("AT&T") on November 15, 2001. At its November 27, 2001, meeting, the Commission granted the interventions. The Commission also requested that the parties submit proposed procedural schedules by December 7, 2001. The Commission received proposed procedural schedules from all of the parties.

At its December 12, 2001, meeting, the Commission set the following procedural schedule:

January 18, 2002 - Intervenors and Staff identify disputed issues (except for issues relating to the final OSS report which has not been issued yet);

February 7, 2002 - A prehearing conference will be held beginning at 2:30 p.m., in Room 468, State Capitol Building, Pierre, South Dakota;

March 18, 2002 - Staff and Intervenors' testimony is due;

April 2, 2002 - Qwest may file rebuttal testimony; and

April 22-26, 2002 - A hearing will be held beginning at 9:00 a.m. on April 22, 2002 and continuing through April 26, 2002, in Room 412, State Capitol Building, Pierre, South Dakota.

On March 5, 2002, Black Hills FiberCom filed a Motion for Order Denying Petition. On March 6, 2002, Qwest filed a Motion to Remove Document from Commission Record. On March 7, 2002,

Midcontinent filed a Motion for Definition of Track A Analysis. On March 11, 2002, Midcontinent submitted a Motion to Suspend Procedural Schedule or Supplement Prefiled Testimony. On March 13, 2002, AT&T filed a Joinder on Midcontinent Communications' Motion to Suspend Procedural Schedule and Request for Expedited Decision.

At its March 14, 2002, meeting, the Commission considered Midcontinent's Motion to Suspend Procedural Schedule or Supplement Prefiled Testimony and AT&T's Joinder on Midcontinent Communications' Motion to Suspend Procedural Schedule and Request for Expedited Decision. After listening to the arguments of the parties, the Commission voted to grant Midcontinent's Motion to Supplement Prefiled Testimony. Thus, if the Commission's decisions on Black Hills FiberCom's motion or Midcontinent's motion concerning Track A impact the prefiled testimony of any of the parties, the parties would have the opportunity to supplement their prefiled testimony prior to the hearing. The Commission also voted to deny AT&T's Motion to Suspend Procedural Schedule.

At its March 28, 2002, meeting, the Commission considered Qwest's Motion to Remove Document from Commission Record, Black Hills FiberCom's Motion for Order Denying Petition, and Midcontinent's Motion for Definition of Track A Analysis. The Commission also considered scheduling additional time for the hearing and how to schedule witnesses and/or issues for the hearing.

At the meeting, no one objected to Qwest's Motion to Remove Document from Commission Record. The Commission voted to grant the motion. The Commission then listened to arguments concerning Black Hills FiberCom's Motion for Order Denying Petition and Midcontinent's Motion for Definition of Track A Analysis. After considering the arguments of the parties, the Commission voted to grant Midcontinent's Motion. The Commission found that Qwest may not rely solely on its SGAT to prove compliance with the 14-point checklist but should also use interconnection agreements and any other evidence to demonstrate to the Commission that it is in compliance with the checklist items. In addition, based on its March 20, 2002, order, the Commission allowed supplemental testimony to be filed. Staff and Intervenors were given the opportunity to file supplemental testimony on or before April 10, 2002, and Qwest was allowed to file supplemental testimony on or before April 16, 2002. The Commission also scheduled additional time for the hearing. The Commission extended the time for the hearing through the morning of May 9, 2002.

The hearing was held as scheduled, beginning on April 22, 2002 and ending on April 30, 2002. At the conclusion of the hearing, the Commission set a post-hearing schedule. The Commission required Qwest to submit an initial brief, an updated SGAT, an updated Qwest Performance Assurance Plan ("QPAP"), a redlined SGAT and QPAP, and a chart showing where contested and uncontested items from the reports in the Multi-state Proceeding had been included or not included in the SGAT and QPAP. From the date those documents were filed, the Intervenors and Staff were given 30 days to file reply briefs. Qwest was allowed to file a rebuttal brief 15 days after the filing of reply briefs.

On May 14, 2002, the Commission received from AT&T a Motion to Reopen Proceedings. On May 24, 2002, the Commission received Qwest Corporation's Opposition to AT&T's Motion to Reopen Proceedings. On May 30, 2002, the Commission received AT&T'S Reply to Qwest Corporation's Opposition to AT&T's Motion to Reopen Proceedings. On June 4, 2002, the Commission received Touch America Inc.'s Petition to Intervene and Motion to Reopen Issues. On June 11, 2002, the Commission received Qwest's Opposition to Touch America's Petition to Intervene and Motion to Reopen Issues.

At its June 13, 2002, meeting, the Commission considered AT&T's and Touch America's motions. After listening to the arguments by the parties, the Commission voted to deny AT&T's Motion to Reopen Proceedings because the Commission had already left the record open at the end of the hearing. In addition, the Commission had previously requested, among other things, that Qwest file copies of any written agreements with competitive local exchange companies that had not been filed with the Commission. See Hearing Transcript for April 30, 2002, at 6-7. The Commission pointed out that this was the very type of information that AT&T was requesting be placed into the record.[1] The Commission denied Touch America's Petition to Intervene due to its untimeliness. The Commission noted that the deadline for intervention in this proceeding was November 16, 2001, the hearing was held in April, the parties were currently briefing the issues, and the issues raised by Touch America were not issues that had just arisen. Since the Commission did not grant Touch America's Petition to Intervene, Touch America's Motion to Reopen Issues was moot.

The Commission participated in the Regional Oversight Committee ("ROC") collaborative section 271 performance measures proceeding. The ROC Operational Support Systems ("OSS") test final report was issued on May 28, 2002. At its May 30, 2002, meeting, the Commission listened to comments from the parties on how to proceed with consideration of the ROC OSS test. By order dated June 19, 2002, the Commission set the following procedural schedule to consider the ROC OSS test:

> July 3, 2002 - Parties may file comments on the ROC OSS test. These comments are optional. A party may present testimony at the hearing without filing comments;
>
> July 11, 2002 - A hearing will be held beginning at 8:30 a.m. on July 11, 2002, in Room 412, State Capitol Building, Pierre, South Dakota. The ROC OSS vendors will present testimony on the ROC OSS test. The following vendors will be giving presentations: MTG - Denise Anderson and Marie Bakunas; KPMG - Mike Weeks and Joe Dellatorre; and HP - Geoff May, Liz Gragert, and Don Petry. All parties will be allowed an opportunity for cross-examination. Following that testimony, all parties will be allowed the opportunity to present additional testimony, which will also be subject to cross-examination. The Commission is scheduling only one day for this hearing. If necessary, the hearing may extend into the evening hours;
>
> July 22, 2002 - Qwest may file a post-hearing brief concerning issues related to the ROC OSS test;
>
> August 5, 2002 - Staff and Intervenors may file a post-hearing brief concerning issues related to the ROC OSS test; and
>
> August 12, 2002 - Qwest may file a rebuttal brief.

On June 25, 2002, the Commission received Qwest's Motion to Amend the Scheduling Order for Review of the ROC OSS Test. Qwest stated that it did not anticipate a need to file a post-hearing brief and requested that Staff and Intervenors file a post-hearing brief on or before July 22, 2002.

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[1] Qwest responded to the Commission's request for information on June 13, 2002. Since Qwest's response had just been filed, the Commission extended the briefing schedule for Intervenors and Staff until July 1, 2002.

and Qwest file a rebuttal brief on or before July 29, 2002. No parties objected to the motion to amend and the Commission amended the procedural schedule accordingly.

Prior to the hearing, comments were submitted by Commission Staff, Qwest, and AT&T. The hearing on the ROC OSS test was held as scheduled on July 11, 2002. Testimony on the ROC OSS test was given by the consultants involved in the ROC OSS test. Denise Anderson and Marie Bakunas testified on behalf of Maxim Telecom Consulting Group (MTG), which acted as the Project Manager. Michael Weeks and Joe Dellatorre testified on behalf of KPMG Consulting. KPMG Consulting prepared the test plan and the final report evaluating the results of the test. Don Petry and Geoff May testified on behalf of Hewlett-Packard which generated test transactions through the creation of a pseudo-CLEC. None of the parties submitted briefs following the hearing.

At its September 5, 2002, meeting, the Commission considered checklist items 3, 7, 8, 9, 10, and 12. The Commission found that, subject to its findings regarding the OSS results, Qwest is in substantial compliance with checklist items 7, 8, 9, 10, and 12. In order for the Commission to find that Qwest is in substantial compliance with checklist item 3, Qwest shall delete the language regarding the potential waiver by this Commission of the 45-day rule. In addition, Qwest shall incorporate the negotiated language from Utah regarding revisions to Section 10.8.2.27 and Exhibit D to the SGAT which address a CLEC's access to Qwest's rights-of-way agreements. Qwest shall make a compliance filing with these revisions, including a redlined version of the changes.

QWEST'S FILING

Qwest's filing was highly dependent on what it refers to as the "Multi-state Proceeding." The Multi-state Proceeding involved the states of Idaho, Iowa, Montana, New Mexico, North Dakota, Utah, and Wyoming. John Antonuk, of the Liberty Consulting Group, was appointed as facilitator of the Multi-state Proceeding ("Multi-state Facilitator"). In the Multi-state proceeding, six of the checklist items were considered pursuant to a "paper" proceeding wherein the parties were able to bring up issues in written testimony and then submit briefs. The other checklist items, as well as Track A, section 272, general terms and conditions, public interest, and the QPAP, were considered pursuant to multiple, joint workshops, during which Qwest and the intervening parties filed testimony, rebuttal testimony, comments, replies, and briefs. The parties also continued to negotiate items throughout this time period and many issues were resolved through negotiations.

For the remaining unresolved issues, the Facilitator developed a record on the issues relevant to each checklist item and issued seven reports. The reports are as follows:

1) Report on Checklist Items 3 (access to poles, ducts, conduits, and rights-of-way); 7 (911/E911, directory assistance, operator services); 8 (directory listings); 9 (number administration); 10 (call-related databases and signaling); and 12 (local dialing parity) (dated March 19, 2001) (commonly referred to as the "Paper Workshop Issues");

2) Report on Checklist Items 1 (interconnection and collocation); 11 (local number portability; 13 (reciprocal compensation); and 14 (resale) (dated May 15, 2001);

3) Report on Emerging Services (line sharing, subloop unbundling, packet switching, and dark fiber) (dated June 11, 2001);

4) Report on Checklist Items 2 (unbundled network elements); 4 (access to unbundled loops); 5 (access to unbundled local transport); and 6 (access to unbundled local switching) (dated August 20, 2001);

5) Report on General Terms and Conditions; Section 272; and Track A (dated September 21, 2001);

6) Public Interest Report (dated October 22, 2001); and

7) Report on Qwest's Performance Assurance Plan (dated October 22, 2001).

These reports, which contained recommended resolutions on disputed issues, were then considered individually by the participating state commissions.

In this proceeding, Qwest submitted the seven Liberty Reports.[2] In addition to the Liberty Reports, Qwest submitted 25 direct affidavits and 24 rebuttal affidavits.[3] The Commission notes that most of the parties' filings and grouping of issues were patterned after the Multi-state Proceeding. However, the Commission points out that, unlike the Multi-state Proceeding, none of the issues in this docket were handled through a "paper" proceeding.[4] Instead, all of the parties were given the opportunity to provide testimony and cross-examine witnesses. Moreover, an issue decided in the Multi-state Proceeding or agreed to by the parties in that proceeding did not preclude any party in this proceeding from bringing up the issue.

FINDINGS REGARDING CHECKLIST ITEMS 3, 7, 8, 9, 10, and 12

CHECKLIST ITEM 3

Section 271(c)(2)(B)(iii) provides that Qwest must provide "[n]ondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by the Bell operating company at just and reasonable rates in accordance with the requirements of section 224." Pursuant to FCC rule:

> (a) A utility shall provide a cable television system or any telecommunications carrier with nondiscriminatory access to any pole, duct, conduit, or right-of-way owned or controlled by it. Notwithstanding this obligation, a utility may deny a cable television system or any telecommunications carrier access to its poles, ducts, conduits, or rights-of-way, on a non-discriminatory basis where there is insufficient capacity or for reasons of safety, reliability and generally applicable engineering purposes.

---

[2] Qwest Exhibits 22-28. The Commission points out that it had previously declined to participate in the Multi-state Proceeding. The main reason for declining to participate was the Commission's concern that small, South Dakota competitive local exchange companies would be unable to participate in a process that took place in other states and required significant time commitments.

[3] The Commission points out that Qwest's position on some issues at the hearing were different from those stated in Qwest's prefiled affidavits. Moreover, Qwest continued to change its position on some issues in its post-hearing briefs.

[4] Thus, any reference by the parties to issues concerning the "paper workshop" only refers to the grouping of certain checklist items in the Multi-state Proceeding.

(b) Requests for access to a utility's poles, ducts, conduits or rights-of-way by a telecommunications carrier or cable operator must be in writing. If access is not granted within 45 days of the request for access, the utility must confirm the denial in writing by the 45th day. The utility's denial of access shall be specific, shall include all relevant evidence and information supporting its denial, and shall explain how such evidence and information relate to a denial of access for reasons of lack of capacity, safety, reliability or engineering standards.

47 C.F.R. § 1.1403(a) and (b).

According to Qwest, it "provides CLECs with access to Qwest's poles, ducts, conduits, and rights-of-way at just and reasonable rates, and under the same terms and conditions that Qwest provides access to itself and its affiliates." Qwest Exhibit 16 at 9. Qwest stated that it takes several steps to provide nondiscriminatory access by "(i) providing access to records; (ii) maintaining a consistent application process; (iii) assisting prospective attachers through the application process and/or in planning attachments; (iv) allocating space to competitors and itself alike on a nondiscriminatory first-come, first-served basis; and (v) promptly responding to requests for access." *Id.* Qwest further stated that as of August 1, 2001, "third parties had attached to 7396 poles in [South Dakota], but no CLEC was occupying Qwest duct space." *Id.* at 5-6. With respect to fees for attachment and occupancy, Qwest asserted that the fees are calculated in accordance with section 224 and the applicable FCC orders. *Id.* at 21. Qwest's current pole attachment fee for attachers that provide telecommunications services in South Dakota "is currently $3.07 per foot, per pole, per year. Qwest's conduit occupancy fee is $.28 per foot, per year." *Id.*

Disputed Issues Regarding Checklist Item 3

1. CLEC Access to Rights-of-Way Agreements

AT&T's Position

AT&T's first issue concerned a CLEC's access to Qwest's rights-of-way agreements. AT&T stated that Qwest's proposed process for obtaining access to an unrecorded agreement requires a CLEC "to go through the unnecessary and burdensome effort of gaining 1) the landowner's consent to such access before access to the agreements will be afforded, and 2) the landowner's agreement to provide notice and opportunity to cure before it will afford CLECs access to ROW agreements." Response Brief of AT&T Regarding Paper Workshop Issues at 2. AT&T stated that it had engaged in further negotiations with Qwest as part of the 271 proceedings in Utah and had agreed on revisions that AT&T would accept in this proceeding. *Id.* at 4. AT&T stated that "[f]or purposes of resolving this issue in this proceeding, AT&T would accept the revisions to section 10.8 and Exhibit D to the SGAT that were filed in Utah." *Id.* (attached Exhibit 3).

Qwest's Position

In its post-hearing reply brief, Qwest stated it would agree to adopt the Utah Commission's approach and incorporate that language in its South Dakota SGAT if this Commission decided to adopt the Utah Commission's approach. Qwest Corporation's Post-Hearing Reply Brief on Compliance with the 14-Point Competitive Checklist at 20.

Commission's Finding

Having reviewed the language adopted in Utah, the Commission finds that the negotiated revisions are reasonable. The Commission finds that the negotiated language clarifies a number of issues and allows CLECs greater access to all rights-of-way agreements. Thus, the Commission directs Qwest to incorporate that language into its SGAT.

2. *Waiver of 45-Day Rule*

Qwest's Position

This issue concerns an FCC rule that requires Qwest to grant a request for access to its poles, ducts, conduits, or rights-of-way within 45 days of the request or deny it in writing by the 45th day. 47 C.F.R. § 1.1403(b). Qwest asked that it be allowed to request a waiver of the 45-day response time from the Commission. Qwest Corporation's Opening Post-Hearing Brief on Paper Workshop Issues at 8-11. In the Multi-state Proceeding, the Facilitator had proposed the following language on this issue:

> In the event that Qwest believes that circumstances require a longer duration to undertake the activities reasonably required to deny or approve a request, it may petition for relief before the Commission or under the escalation and dispute resolution procedures generally applicable to this SGAT.

Qwest Exhibit 22 at 28.[5]

AT&T's Position

AT&T argued that the FCC rule contains no exceptions and does not authorize state commissions to alter this requirement. Response Brief of AT&T Regarding Paper Workshop Issues at 6. AT&T stated that Qwest must seek a waiver of an FCC rule from the FCC, not from a state commission. *Id.*

Commission's Finding

Qwest has not pointed to any legal authority that allows this Commission to waive this FCC rule. Thus, the Commission rejects the language as proposed by Qwest that would have allowed Qwest to seek a waiver of the 45-day rule from this Commission.

---

[5] The Commission points out that the actual language used by Qwest in its SGAT is as follows:

> In the event that Qwest believes that circumstances require a longer duration to undertake the activities reasonably required to deny or approve a request, it may petition for relief before the Commission or under the escalation and dispute resolution procedures generally applicable under the interconnection agreement, if any, between Qwest and CLEC.

Qwest Exhibit 81 (SGAT Exhibit D, section 2.2)

Commission's Finding for Checklist Item 3

The Commission finds that in order for this Commission to find that Qwest is in substantial compliance with Checklist Item 3, Qwest shall delete the language regarding the potential waiver of the 45-day rule and Qwest shall incorporate the negotiated language from Utah regarding revisions to section 10.8.2.27 and Exhibit D to the SGAT.

CHECKLIST ITEM 7(II)

Section 271(c)(2)(B)(vii)(I) requires Qwest to provide nondiscriminatory access to 911 and E911 services. The FCC requires a Bell Operating Company ("BOC") to provide competitors access to a BOC's 911 and E911 services in the same manner that a BOC obtains the access. *Application of SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance, Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas*, Memorandum Opinion and Order, CC Docket No. 00-65, FCC 00-238, 15 FCC Rcd 18354, ¶ 343 (rel. June 30, 2000).

According to Qwest, the 911 and E911 services that CLECs provide to their end user customers, through access to Qwest's services, database, and facilities are at parity with the 911 and E911 services that Qwest provides to its own end user customers. Qwest Exhibit 32 at 9. Qwest explained Basic 911 and Enhanced 911 as follows:

> Basic 911 service routes all emergency calls made through a given central office ("CO") to a single PSAP [Public Service Answering Point which is operated by the government agency responsible for public safety]. Enhanced 911 service incorporates the Automatic Number Identification ("ANI") feature to forward the end user's telephone number to the PSAP. The E911 service uses the ANI information to retrieve the end user's name and street address from the Automatic Location Identification ("ALI") database and then forwards it to the PSAP. The ALI database is managed for Qwest by a third party, Intrado Inc. (formerly SCC Communications Corp.). Intrado provides E911 database management services for Qwest and other local exchange carriers.

Id. at 7 (footnote omitted.) Qwest further stated that its contract with Intrado requires Intrado to provide ALI database management services to all CLECs in a competitively neutral manner and at parity with the services it provides to Qwest. *Id.* at 10. Facilities-based CLECs that have their own switching facilities must provide Intrado with their customers' names and addresses and updates to their customers' records. *Id.* at 17-18.

Qwest claimed that "[a]s of August 31, 2001, Qwest had provided thirteen facilities-based CLECs in South Dakota with access to E911 service with 24,992 customer line records in the E911 database. Qwest also was providing access to 911/E911 service for eight reseller CLECs and five CLECs using Qwest's unbundled switching in South Dakota." *Id.* at 6. Qwest explained that it does not charge a CLEC to update the E911 database, but Intrado may assess charges for updates to the ALI database and for other services. *Id.* at 21. Qwest recovers its costs by billing the end user customer, remitting it to the responsible government agency, and billing the agency for Qwest's costs. *Id.*

Disputed Issues Regarding Checklist Item 7(i)

1. Private Switch/Automatic Location Identification

AT&T's Position

AT&T questioned the ability of a CLEC to request Private Switch/Automatic Location Identification (PS/ALI) service. Hearing Transcript for April 29, 2002, at 133-34. This service allows the PSAP to determine the extension or floor when a 911 call has been made in an office building which has a private branch exchange. *Id.*

Qwest's Position

Qwest responded that it has added language to the SGAT which documents its commitment to provide CLECs with PS/ALI service. Qwest Corporation's Opening Post-Hearing Brief on Paper Workshop Issues at 18. Qwest also noted that it has provisioned PS/ALI in other states but that no CLEC in South Dakota has requested the service. Qwest Exhibit 33 at 7.

Commission's Finding

The Commission has reviewed Qwest's revised SGAT and find that it has added this language. Qwest Exhibit 81 (section 10.3.9). The Commission finds that this issue has been resolved.

2. Unlocking of Database Records

AT&T's Position

AT&T expressed its concern about delays in the unlocking of E911 database records when a consumer becomes a CLEC customer. Hearing Transcript for April 29, 2002, at 135. AT&T asserted that when the number is ported, Qwest sometimes fails to unlock the 911 database which prevents AT&T from changing the address or other information. *Id.*

Qwest's Position

Qwest responded that the National Emergency Number Association and the Local Number Portability Administration-Working Group developed a new standard to address this problem and Qwest reached an agreement on January 29, 2002, with Intrado to implement the new process. Qwest Exhibit 33 at 9-10. Qwest stated that under the new process, if the database update is unsuccessful due to a locked record, Intrado will access the Local Number Portability database to verify that the new service provider has made the port activation. *Id.* at 10. If the port was activated, Intrado will unlock the record and update the database. *Id.* Qwest further claimed that since Intrado implemented this new process on February 25, 2002, Intrado has cleared 100% of the valid migrate orders each day. *Id.* at 15.

Commission's Finding

It would appear that the new process has alleviated AT&T's concern on this issue. The Commission finds that no additional action by Qwest is required to address this issue.

3. Disconnection of 911 Trunks

AT&T's Position

The third issue raised by AT&T was the accidental disconnection of CLEC 911 trunks by Qwest. Hearing Transcript for April 29, 2002, at 135. AT&T requested that "Qwest reinforce its rules and its procedures for protecting CLEC 911 trunks so that there is no accidental disconnection as we have seen in the past." *Id.*

Qwest's Position

Qwest claimed that there was only an isolated incident in Minneapolis, Minnesota and that AT&T was never without working trunk groups to access the PSAP. *Id.* at 18-21.

Commission's Finding

The Commission finds that the incident raised by AT&T was an isolated incident. The Commission finds insufficient evidence to support a finding that any additional processes or procedures are needed in order to prevent accidental disconnection of CLEC 911 trunks.

Commission's Finding for Checklist Item 7(i)

Subject to the Commission's findings regarding OSS, the Commission finds Qwest is in substantial compliance with this checklist item.

CHECKLIST ITEMS *7(ii) and 7(iii)*

Section 271(c)(2)(B)(vii)(II) requires Qwest to provide nondiscriminatory access to "directory assistance services to allow the other carrier's customers to obtain telephone numbers[.]" Section 271(c)(2)(B)(vii)(III) requires Qwest to provide nondiscriminatory access to "operator call completion services." The FCC has found that a BOC must be in compliance with the regulations implementing section 251(b)(3) which imposes on local exchange carriers "the duty to permit all [competing providers of telephone exchange service and telephone toll service] to have nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays."

The FCC has defined nondiscriminatory access as the ability of "the customers of all telecommunications service providers [to] be able to access each LEC's directory assistance service and obtain a directory listing on a nondiscriminatory basis, notwithstanding: (1) the identity of the requesting customer's local telephone service provider; or (2) the identity of the telephone service provider for a customer whose directory listing is requested." Second Report and Order, *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Dkt No. 96-98, 11 FCC Rcd 13932, ¶ 114 (1996). Qwest "must permit telephone service customers to connect to the operator services offered by that customer's chosen local service provider by dialing '0,' or '0' plus the desired telephone number, regardless of the identity of the customer's local telephone service provider." 47 C.F.R. § 51.217(c)(2). With respect to directory assistance services, Qwest:

> shall permit competing providers to have access to its directory assistance services, including directory assistance databases, so that any customer of a competing

provider can obtain directory listings, except as provided in paragraph (c)(3)(iv) of this section, on a nondiscriminatory basis, notwithstanding the identity of the customer's local service provider, or the identity of the provider for the customer whose listing is requested. A LEC must supply access to directory assistance in the manner specified by the competing provider, including transfer of the LECs' directory assistance databases in readily accessible magnetic tape, electronic or other convenient format, as provided in paragraph (c)(3)(iii) of this section. Updates to the directory assistance database shall be made in the same format as the initial transfer (unless the requesting LEC requests otherwise), and shall be performed in a timely manner, taking no longer than those made to the providing LEC's own database. A LEC shall accept the listings of those customers served by competing providers for inclusion in its directory assistance/operator services databases.

47 C.F.R. § 51.217(c)(3)(i).

Qwest stated that a "CLEC may (a) purchase and resell Qwest's operator services and/or directory assistance services; (b) provide operator services and/or directory assistance services itself; or (c) provide operator services and/or directory assistance services using a third party's facilities and personnel. Access configurations for these different methods of providing access to operator services and directory assistance services differ for reseller CLECs, CLECs that purchase UNE-P combinations or stand-alone unbundled switching, and CLECs that use their own switching facilities." Qwest Exhibit 49 at 8. Qwest asserted that it provides the same directory assistance and operator services to CLEC end user customers that Qwest provides to its retail end user customers and uses the same methods, practices, and standards in providing those services. *Id.* at 11. Calls are handled on a first-come, first-served basis. *Id.* at 14.

With respect to branding, Qwest stated that CLECs that purchase operator services or directory assistance services from Qwest may brand end users' calls with Qwest's brand, or, where technically feasible, with the CLEC's name or a generic brand message. *Id.* at 7-13. If a reseller or facilities-based CLEC purchases UNE-P or combinations or unbundled switching, Qwest offers specific and generic branding using customized routing. *Id.* at 19. Qwest claimed that no reseller or facilities-based CLEC had requested this type of customized or generic branding in South Dakota. *Id.* Qwest also has implemented Originating Line Number Screening technology in order to provide specific or generic branding without the need for customized routing and dedicated trunks and transport. *Id.*

Qwest claimed that "[a]s of August 31, 2001, Qwest had provided directory assistance and operator services to eight reseller CLECs in South Dakota. As of the same date, Qwest provides 67 operator service trunks to two facilities-based CLECs in South Dakota." *Id.* at 2. With respect to pricing, Qwest stated that it provides directory assistance and operator services to facilities-based CLECs at market-based rates and to reseller CLECs at wholesale discount rates that have been set or approved by the Commission. *Id.* at 24.

Qwest is prohibited from providing "access to unlisted telephone numbers, or other information that its customer has asked the LEC not to make available, with the exception of customer name and address. The LEC shall ensure that access is permitted to the same directory information, including customer name and address, that is available to its own directory assistance customers." 47 C.F.R. § 51.217(c)(3)(iv). Qwest claimed that "Qwest's operators have access to exactly the same information regarding nonpublished listings that CLECs receive through Qwest's Directory Assistance List service and Directory Assistance Database Service." Qwest Exhibit 49 at 23.

Disputed Issues Regarding Checklist Items 7(ii) and 7(iii)

1. Branding

FiberCom's Position

At the hearing, Black Hills FiberCom stated that although the customized branding service was listed in Qwest's catalog, it was not available in South Dakota until after a switch was upgraded. Hearing Transcript for April 29, 2002, at 78.[6]

Qwest's Position

Qwest stated that CLEC-specific branding was not available until September of 2001, but Qwest now provides the service to Black Hills FiberCom and it is working properly. Qwest Exhibit 50 at 5-7.

Commission's Finding

The FCC rule on branding provides as follows:

> (d) Branding of operator services and directory assistance services. The refusal of a providing local exchange carrier (LEC) to comply with the reasonable request of a competing provider that the providing LEC rebrand its operator services and directory assistance, or remove its brand from such services, creates a presumption that the providing LEC is unlawfully restricting access to its operator services and directory assistance. The providing LEC can rebut this presumption by demonstrating that it lacks the capability to comply with the competing provider's request.

47 C.F.R. § 51.217(d).

Black Hills FiberCom did not bring up this issue in its post-hearing brief so the Commission assumes that FiberCom is now being provided the branding services it requested. However, the Commission notes that FiberCom's point in bringing up this issue was Qwest's inability to provide this service in South Dakota until September, despite the service being listed in its catalog prior to that time. The Commission may consider this issue in another portion of its findings in this proceeding.

Commission's Finding for Checklist Items 7(ii) and 7(iii)

Subject to the Commission's findings regarding OSS, the Commission finds Qwest is in substantial compliance with these checklist items.

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[6] In its prefiled testimony, Black Hills FiberCom stated that it had requested branding of directory assistance that was continually delayed. However, Black Hills FiberCom did not put this witness's testimony into the record at the hearing.

CHECKLIST ITEM 8

Section 271(c)(2)(B)(viii) requires Qwest to provide "[w]hite pages directory listings for customers of the other carrier's telephone exchange service." The FCC rule states that "[a] local exchange carrier (LEC) that provides operator services, directory assistance services or directory listings to its customers, or provides telephone numbers, shall permit competing providers of telephone exchange service or telephone toll service to have nondiscriminatory access to that service or feature, with no unreasonable dialing delays." 47 C.F.R. § 51.217(b). The FCC further requires the following:

> (ii) Access to directory listings. A LEC that compiles directory listings shall share directory listings with competing providers in the manner specified by the competing provider, including readily accessible tape or electronic formats, as provided in paragraph (c)(3)(iii) of this section. Such data shall be provided in a timely fashion.
> (iii) Format. A LEC shall provide access to its directory assistance services, including directory assistance databases, and to its directory listings in any format the competing provider specifies, if the LEC's internal systems can accommodate that format.
> (A) If a LEC's internal systems do not permit it to provide directory assistance or directory listings in the format specified by the competing provider, the LEC shall:
> (1) Within thirty days of receiving the request, inform the competing provider that the requested format cannot be accommodated and tell the requesting provider which formats can be accommodated, and
> (2) Provide the requested directory assistance or directory listings in the format the competing provider chooses from among the available formats.
> (B) [Reserved]
> (iv) Unlisted numbers. A LEC shall not provide access to unlisted telephone numbers, or other information that its customer has asked the LEC not to make available, with the exception of customer name and address. The LEC shall ensure that access is permitted to the same directory information, including customer name and address, that is available to its own directory assistance customers.

47 C.F.R. § 51.217(c)(3)(ii)-(iv).

Qwest stated that it provides the same types of white pages directory listings to CLECs that Qwest provides to its own retail end users. Qwest Exhibit 51 at 6. Qwest explained that these listings include primary, premium, and privacy listings and that the "[w]hite pages listings for CLEC end users are integrated alphabetically with Qwest retail end user listings and are indistinguishable from Qwest's listings." *Id.* at 7-8. Qwest further claimed that it uses "the same or similar methods and procedures and the same databases and systems for processing Qwest retail end user listings and CLEC end user listings." *Id.* at 8. In addition, Qwest provides CLECs with monthly "verification proofs" which show all listings to be published that have been changed or added during the prior month. *Id.* at 14-15. Qwest also maintained that it "provides for the delivery of directories to CLEC end user customers on the same terms and conditions as directories are delivered to Qwest's end user customers." *Id.* at 16. In addition, Qwest provides white pages to CLECs that publish their own directories. *Id.* at 17. The listings are provided in electronic format or by another medium that the parties agree upon. *Id.*

According to Qwest, as of August 31, 2001, Qwest had included 45,239 listings for South Dakota reseller and facilities-based CLECs in Qwest's listings databases. *Id.* at 3. With respect to prices, Qwest does not charge for primary listings in its white pages for each main user telephone

number. *Id.* at 17. For premium and privacy listing, Qwest charges CLECs Qwest's retail price less the wholesale discounts approved by the Commission. *Id.*

Disputed Issues Regarding Checklist Item 8

1. Directory Listings Errors

Midcontinent's Position

Midcontinent stated that it had numerous problems with directory listings for resold customers. Midcontinent Exhibit 38 at 4. Midcontinent asserted that it had experienced 80 separate problems in January and February of 2002. *Id.* Some of the types of problems were the listing of residential customers in the business sections, misspellings, the listing of numbers that were not supposed to be listed, and the listing of addresses that were not supposed to be excluded. *Id.* at 5. Midcontinent further stated that it has "had more contact with our sales representatives perhaps in the past six months than we have in the previous couple of years. We've scheduled regular monthly meetings with our service representative to work out specific problems and issues." Hearing Transcript for April 29, 2002, at 17. Midcontinent went on to state that "[t]here is concern, however, that once the checklist has been deemed complete, the level of cooperation may diminish." *Id.* at 18.

In its post-hearing brief, Midcontinent stated that "the issue here is not whether [problems] occurred and were eventually corrected, but whether Qwest's zeal for eliminating problems in the future will continue past its receipt of 271 interLATA long distance authority." Midcontinent's Post Hearing Brief at 8-9.

Qwest's Position

In Qwest's post-hearing brief, it stated that the listing errors identified by Midcontinent accounted for less than one percent of Midcontinent's total number of listings. Qwest Corporation's Post-Hearing Reply Brief on Compliance with the 14-Point Competitive Checklist at 31. Qwest confirmed that it is now meeting monthly with Midcontinent representatives to discuss directory listings, as well as other issues. Qwest Exhibit 52 at 4. Qwest has also "agreed to audit 10% of Midcontinent's service orders as they appear in Qwest's service order processor compared to the local service requests (LSRs) submitted to Qwest by Midcontinent. If an error is found, it is corrected, and more importantly, Qwest's personnel are trained on correct procedures." *Id.*

Commission's Finding

The Commission recognizes that even a relatively small number of errors in listings can impact a small CLEC's relationship with its customers. However, as pointed out by Qwest, the FCC has found that:

> Although anecdotal evidence may be indicative of systemic failures, isolated incidents may not be sufficient for a commenter to overcome the BOC's prima facie case. Moreover, a BOC may overcome such anecdotal evidence by, for example, providing objective performance data that demonstrates that it satisfies the statutory nondiscrimination requirement.

Application of Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in New York, 15 FCC Rcd 76 (1999), ¶ 58, *aff'd sub nom AT&T Corp. v. FCC*, 220 F.3d 607 (D.C.Cir. 2000).

The Commission notes that there are two PIDs for directory listings: 1) DB-1C-1, Time to Update Database, which measures the average amount of time it takes to update the listings database; and 2) DB-2C-1, Percentage of Accurate Database Updates, which measures the percentage of directory listings database updates completed without errors in the reporting period. Qwest Exhibit 71, (attached as Exhibit MGW-PERF-6 at 79-81). According to the test results, Qwest is providing accurate database updates to itself and CLECs in the range of 92.78% to 94.04%. Qwest Exhibit 86, S.D. Perf. Results at 163. The Commission finds that the evidence does not demonstrate that Qwest is providing discriminatory access. However, the Commission also notes that it shares Midcontinent's concern that Qwest's attention to Midcontinent's problems may wane if Qwest is granted section 271 approval. The Commission may address this concern in other portions of its findings in this proceeding.

Commission's Finding for Checklist Item 8

Subject to the Commission's findings regarding OSS, the Commission finds Qwest is in substantial compliance with this checklist item.

CHECKLIST ITEM 9

Section 271 (c)(2)(B)(ix) provides that until telecommunications numbering administration guidelines, plan, or rules are established, Qwest must provide nondiscriminatory access to telephone numbers for assignment to a competing carrier's telephone exchange service customers. Once numbering administration guidelines, plan, or rules are established, Qwest must comply with them.

Qwest explained that

> In order to provide local exchange telephone service within the public switched telephone network, facilities-based carriers must have a NXX code(s) assigned to their switch for the provision of telephone numbers to their subscribers. Numbering administration had traditionally been the responsibility of Bellcore and the predominant local telephone company in each region. The 1996 Act, however, directed the FCC to "create or designate one or more impartial entities to administer telecommunications numbering and to make such numbers available on an equitable basis."

Qwest Exhibit 34 at 4. The FCC first designated Lockheed Martin IMS as the new code administrator; later that responsibility was transferred to Neustar. *Id.* at 5-6.

Qwest further stated that it:

> has processes in place to ensure that all NXX codes and routing information are programmed into Qwest's switches in a nondiscriminatory and timely manner to meet the NXX code activation dates published in the LERG [Local Exchange Routing Guide]. Specifically, Qwest has established processes to track new NXX code live dates, verify that facilities and routing information is provided by CLECs, and ensure accurate and timely activation of NXXs. Qwest provides documentation for CLECs regarding the industry's numbering administration and assignment processes and

Qwest's methods and procedures for NXX code activation and repair processes on Qwest's website.

Id. at 8.

Commission's Finding for Checklist Item 9

None of the parties raised any disputed issues regarding this checklist item. Subject to the Commission's findings regarding OSS, the Commission finds Qwest is in substantial compliance with this checklist item.

CHECKLIST ITEM 10

Section 271(c)(2)(B)(x) provides that Qwest must provide to competing carriers "[n]ondiscriminatory access to databases and associated signaling necessary for call routing and completion." The FCC has determined that an incumbent local exchange company ("LEC") must provide unbundled access to call related databases, signaling systems, and service management systems as network elements. 47 C.F.R. § 51.319(e). The FCC requires incumbent LECs to provide unbundled access to the Line Information Database, the Toll Free Calling Database, the Local Number Portability Database, the Advanced Intelligent Network Databases, the Calling Name Database, the 911 Database, and the E911 Database. 47 C.F.R. § 51.319(e)(2)(i). With respect to its signaling system, Qwest must provide nondiscriminatory access to its signaling network which includes signaling links and signaling transfer points. 47 C.F.R. § 51.319(e)(1).

Qwest stated that:

> CLECs can gain access to Qwest's call-related databases and associated signaling in the same manner and using the same facilities, equipment, and procedures as Qwest uses to provide such access to itself. Qwest's signaling network and call-related databases automatically handle all call routing and database queries in the same manner, regardless of whether a query originates on a CLEC network or on Qwest's network. Qwest's signaling network commingles all call routing messages and database queries, and Qwest's call-related databases process all queries on a first-come, first-served basis.

Qwest Exhibit 36 at 2. Qwest further claimed that it provides CLECs access to the signaling transfer points linked to Qwest's call-related databases and to Qwest's service management systems. *Id.* at 2-3.

Qwest stated that as of August 31, 2001, no facilities-based CLEC in South Dakota was purchasing unbundled access to Qwest's signaling network. Qwest Exhibit 36 at 6. With respect to call-related databases, Qwest asserted that as of August 31, 2001, there was one facilities-based CLEC purchasing unbundled access to the 8XX database, the Line Information Database, the InterNetwork Calling Name Database and the Local Number Portability Database. *Id.* at 11. No CLECs were using Qwest's Advanced Intelligent Network databases. *Id.*

Commission's Finding for Checklist Item 10

None of the parties had any disputed issues regarding this checklist item. Subject to the Commission's findings regarding OSS, the Commission finds Qwest is in substantial compliance with this checklist item.

CHECKLIST ITEM 12

Section 271(c)(2)(B)(xii) states that Qwest must provide to competing carriers "[n]ondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of section 251(b)(3)." Dialing parity is defined as the ability of a person that is not an affiliate of a local exchange carrier "to provide telecommunications services in such a manner that customers have the ability to route automatically, without the use of any access codes, their telecommunications to the telecommunications services provider of the customer's designation from among 2 or more telecommunications services providers (including such local exchange carrier)." 47 U.S.C. § 153(15). The FCC requires local exchange carriers to "permit telephone exchange service customers within a local calling area to dial the same number of digits to make a local telephone call notwithstanding the identity of the customer's or the called party's telecommunications service provider." 47 C.F.R. § 51.207. Dialing parity must be provided with no unreasonable dialing delays. 47 C.F.R. § 51.205; 47 U.S.C. § 251(b)(3).

Qwest stated that "CLEC and Qwest customers dial the same number of digits without any access codes, and can use the same dialing patterns, to place calls to a Qwest customer, a CLEC customer, directory assistance, or operator services." Qwest Exhibit 40 at 6. In addition, Qwest asserted that there are not any requirements or technical constraints that cause CLEC customers to experience inferior quality service or longer post-dialing delays and that the processing of callers in Qwest's central offices is the same for the customers of CLECs and Qwest. *Id.* at 7.

Commission's Finding for Checklist Item 12

None of the parties had any disputed issues regarding this checklist item. The Commission finds Qwest is in substantial compliance with this checklist item.

Verification of Compliance With This Order

As stated above, in order for the Commission to find that Qwest is in substantial compliance with checklist item 3, Qwest shall delete the language regarding the potential waiver of the 45-day rule and Qwest shall incorporate the negotiated language from Utah regarding revisions to Section 10.8.2.27 and Exhibit D to the SGAT. Qwest shall make a compliance filing with these revisions including a redlined version of the changes.

It is therefore

ORDERED, that Qwest shall make a compliance filing as described above; and it is

FURTHER ORDERED, that the parties shall have ten days following Qwest's filing of its compliance filing to submit written objections concerning the revisions; and it is

FURTHER ORDERED, that the Commission finds Qwest in substantial compliance with the checklist items as listed above, subject to the Commission's review of the OSS results and subject to Qwest making the revisions as ordered above.

Dated at Pierre, South Dakota, this 19th day of September, 2002.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addressed envelopes, with charges prepaid thereon.

By: Delaine Kolbo

Date: 9/19/02

(OFFICIAL SEAL)

BY ORDER OF THE COMMISSION:

JAMES A. BURG, Chairman

PAM NELSON, Commissioner

ROBERT K. SAHR, Commissioner

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE ANALYSIS OF QWEST CORPORATION'S COMPLIANCE WITH SECTION 271(c) OF THE TELECOMMUNICATIONS ACT OF 1996	))))	ORDER REGARDING CHECKLIST ITEMS 1, 11, 13, AND 14 TC01-165

The procedural history for this docket is set forth in the Commission's order regarding checklist items 3, 7, 8, 9, 10, and 12. At its September 5, 2002, meeting, the Commission found that, subject to its findings regarding Qwest's Operational Support Systems (OSS), Qwest is in substantial compliance with checklist items 1, 11, 13, and 14.

FINDINGS REGARDING CHECKLIST ITEMS 1, 11, 13, and 14

CHECKLIST ITEM 1

Section 271(c)(2)(B)(i) requires Qwest to provide "[i]nterconnection in accordance with the requirements of sections 251(c)(2) and 252(d)(1)." Section 251(c)(2) imposes upon Qwest the following obligations with respect to interconnection:

> The duty to provide, for the facilities and equipment of any requesting telecommunications carrier, interconnection with the local exchange carrier's network – (A) for the transmission and routing of telephone exchange service and exchange access; (B) at any technically feasible point within the carrier's network; (C) that is at least equal in quality to that provided by the local exchange carrier to itself or to any subsidiary, affiliate, or any other party to which the carrier provides interconnection; and (D) on rates, terms and conditions that are just, reasonable, and nondiscriminatory, in accordance with the terms and conditions of the agreement and the requirements of this section and section 252.

With respect to collocation, section 251(c)(6) requires Qwest "to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State commission that physical collocation is not practical for technical reasons or because of space limitations."

Section 252(d)(1) describes how state commissions determine rates for interconnection and provides that such rates must be "(i) based on the cost (determined without reference to a rate-of-return or other rate-based proceeding) of providing the interconnection or network element (whichever is applicable), and (ii) nondiscriminatory, and (B) may include a reasonable profit."

The FCC has defined the term "interconnection" as "the linking of two networks for the mutual exchange of traffic. This term does not include the transport and termination of traffic." 47 C.F.R. § 51.5. The FCC has identified a minimum list of technically feasible points of interconnection: (1) the line-side of a local switch; (2) the trunk-side of a local switch; (3) the trunk interconnection points for a tandem switch; (4) central office cross-connect points; (5) out-of-band signaling transfer points necessary to exchange traffic at these points and access to call-related databases; and (6) points of access to unbundled network elements. 47 C.F.R. § 51.305(a)(2).

The FCC has defined physical collocation as follows:

> Physical collocation is an offering by an incumbent LEC that enables a requesting telecommunications carrier to:
> (1) Place its own equipment to be used for interconnection or access to unbundled network elements within or upon an incumbent LEC's premises;
> (2) Use such equipment to interconnect with an incumbent LEC's network facilities for the transmission and routing of telephone exchange service, exchange access service, or both, or to gain access to an incumbent LEC's unbundled network elements for the provision of a telecommunications service;
> (3) Enter those premises, subject to reasonable terms and conditions, to install, maintain, and repair equipment necessary for interconnection or access to unbundled elements; and
> (4) Obtain reasonable amounts of space in an incumbent LEC's premises, as provided in this part, for the equipment necessary for interconnection or access to unbundled elements, allocated on a first-come, first-served basis.

The FCC has defined virtual collocation as follows:

> Virtual collocation is an offering by an incumbent LEC that enables a requesting telecommunications carrier to:
> (1) Designate or specify equipment to be used for interconnection or access to unbundled network elements to be located within or upon an incumbent LEC's premises, and dedicated to such telecommunications carrier's use;
> (2) Use such equipment to interconnect with an incumbent LEC's network facilities for the transmission and routing of telephone exchange service, exchange access service, or both, or for access to an incumbent LEC's unbundled network elements for the provision of a telecommunications service; and
> (3) Electronically monitor and control its communications channels terminating in such equipment.

The Commission will discuss interconnection and collocation separately.

Interconnection

Qwest stated that its SGAT provides the following types of interconnection: "(1) a DS1 or DS3 entrance facility provided by Qwest; (2) physical or virtual collocation associated with a CLEC-provided facility; (3) negotiated mid-span meet facilities; and (4) other technically feasible methods of interconnection." Qwest Exhibit 14 at 5. Qwest provides interconnection trunking to six facilities-based CLECs in South Dakota. *Id.* at 12. As of September 1, 2002, CLECs had 7,049 interconnection trunks in service, with 4,990 connecting CLEC end offices to Qwest end offices, and 2,059 connecting CLEC end offices with Qwest tandem offices. *Id.* According to Qwest, 94% of the interconnection trunks were two-way trunks. *Id.* A CLEC may order a local interconnection trunk through an Access Service Request which the CLEC may submit via an electronic system called EXACT, or by mail or facsimile. *Id.* at 15.

Qwest explained that Qwest and the CLECs share estimates of trunk forecasting. *Id.* at 17. Qwest maintained that it provides "facilities and equipment in sufficient quantity to connect the number of people who might, under busy-hour conditions, simultaneously attempt to pass calls between networks." *Id.* at 18. If monthly traffic data reports indicate excess blocking for a two-way

interconnection trunk group, Qwest will advise the CLEC of the need to provision additional trunks. *Id.* at 20.

Disputed Issues Regarding Interconnection

1. Indemnification

AT&T's Position

AT&T recommended that an indemnity provision be added to section 7.1.1.1 of Qwest's SGAT which would indemnify a CLEC if Qwest fails to provide a CLEC interconnection at least equal in quality to the interconnection that it provides to itself. AT&T Exhibit 10 at 6-7.

Qwest's Position

Qwest responded that the proposed language is unnecessary and there is already adequate indemnification language in the General Term and Conditions portion of the SGAT, as well as incentives provided in the QPAP. Qwest Exhibit 15 at 4.

Commission's Finding

The Commission finds that AT&T's proposed language is too broad. As noted by the Facilitator in the Multi-state Proceeding, interconnection involves the *mutual* exchange of traffic and each party has facilities that support the exchange of traffic. Exhibit 23 at 31. Yet, under AT&T's proposal, the CLEC's conduct appears to be irrelevant as there is no language which allows "for a reasoned determination of responsibility in the event that harm occurs." *Id.* The Commission finds that Qwest is not required to add AT&T's proposed indemnification language. Indemnification is an issue that is properly contained in the General Terms and Conditions sections of the SGAT.

2. Use of Entrance Facilities

AT&T's Position

AT&T questioned the ability of a CLEC to obtain a point of interconnection (POI) on Qwest's network. AT&T stated "Qwest's SGAT does not expressly allow CLECs to obtain a POI on Qwest's network because there is no way for the CLEC to obtain the dedicated trunk necessary to reach such POI." AT&T Exhibit 10 at 10. AT&T further asserted that "[t]he only method that comes close to dedicated trunks is the offer of 'entrance facilities,' but these fall far short because they dictate the location of the POI as somewhere on the CLEC network, not on Qwest's network." *Id.* AT&T proposed additional language to sections 7.1.2.1 and 7.3.2.1.1 of Qwest's SGAT. *Id.*

Qwest's Position

Qwest asserted that "Qwest has routinely provided CLECs with dedicated trunking to CLEC-selected POIs both inside and outside Qwest central outside buildings" and that a "CLEC may choose a POI location anywhere in Qwest's ILEC territory." Qwest Exhibit 15 at 5. Qwest explained that "[w]hen trunking is configured to a POI associated with collocation, the entrance facility component of interconnection is avoided on Qwest's side of the POI." *Id.* Qwest also noted that it had agreed to allow access to UNEs via entrance facilities. *Id.* at 8.

Commission's Position

The Commission notes that, as Commission Staff recommended, Qwest now allows access to UNES via entrance facilities. *See* Staff Exhibit 1 at 24. In addition, the Commission finds that the entrance facility requirement does not prohibit a CLEC from choosing the location of a POI. The Commission finds Qwest's language acceptable.

3. Expanded Interconnection Channel Termination Charges

AT&T's Position

AT&T also raised an issue as to Qwest's Expanded Interconnection Channel Termination (EICT) charge. AT&T Exhibit 10 at 11. AT&T acknowledged that Qwest has changed its Exhibit A to reflect a charge of zero for EICT charges. *Id.* at 12. However, AT&T requested that the Commission confirm that Qwest may not charge CLECs for EICT wires. *Id.*

Qwest's Position

Qwest stated that it had no objection to this request.

Commission's Finding

The Commission finds this issue has been resolved and further states that Qwest may not charge CLECs for EICT wires.

4. Transport Greater than 50 Miles

AT&T's Position

AT&T's next issue concerns section 7.2.2.1.5 of the SGAT regarding direct trunked transport greater than 50 miles. AT&T Exhibit 10 at 12. AT&T claimed this provision requires CLECs to build a mid-span trunk to all trunk interconnection routes over 50 miles when neither the CLEC or Qwest have facilities in place. *Id.*

Qwest's Position

Qwest noted that the language of section 7.2.2.1.5 provides that if the parties are unable to agree on a mid-point arrangement when direct trunked transport is greater than 50 miles, the parties can bring the matter before the Commission for resolution on an Individual Case Basis. Qwest Exhibit 15 at 10.

Commission's Finding

The Commission finds that the language in section 7.2.2.1.5 is reasonable. AT&T's statement that all interconnection trunks over 50 miles are arbitrarily turned into mid-span meets is simply untrue since, if the parties cannot agree, the Commission will decide how to handle such a request. Although AT&T states that Qwest has not provided a single instance of being required to build such transport (AT&T Exhibit 10 at 13), such transport is certainly not inconceivable in South Dakota.

5. Trunk Forecasting

AT&T's Position

This issue concerns under what circumstances Qwest can require a deposit when it installs trunks pursuant to CLEC forecasts and under what conditions may those deposits be refunded. AT&T objected to Qwest's proposed SGAT language in section 7.2.2.8.6.1 which included a provision allowing Qwest to seek non-punitive liquidated damages if Qwest constructs non-reusable facilities in response to a CLEC forecast and subsequent orders are not issued by the CLEC within six months of the completed construction. AT&T Exhibit 10 at 13. AT&T proposed modifications to the language. *Id.* at 14.

Qwest's Position

In its rebuttal testimony, Qwest changed its position on this issue and adopted the changes proposed by the Facilitator in the Multi-state Proceeding. Qwest Exhibit 15 at 12-13. This language provides that the basis for returning a deposit should be 50% usage of trunks installed, not forecasted, and that the usage should include usage for all CLECs, instead of only the CLEC making the deposit. *Id.* Qwest further stated that if AT&T prefers AT&T's proposed language, Qwest would agree to use it in the AT&T interconnection agreement. *Id.* at 12

Commission's Finding

The Commission notes that Commission Staff recommended the approach taken by the Multi-state Facilitator. *See* Staff Exhibit 1 at 29. The Commission agrees with Staff that calculating usage percentage on the basis of installed trunks is preferable because it reflects Qwest's actual costs of building trunk capacity installed trunks. *Id.* The Commission finds that the language as revised by Qwest for section 7.2.2.8.6.1 is reasonable. In addition, the Commission finds that since Qwest has agreed to incorporate AT&T's proposed revisions in the AT&T interconnection agreement, this issue appears to have been resolved.

6. Confidentiality of Forecasts

AT&T's Position

With respect to the confidentiality of forecasts, AT&T recommended that section 7.2.2.8.12 be removed because it duplicates the nondisclosure language found in a General Terms and Conditions section. AT&T Exhibit 10 at 16.

Qwest's Position

Qwest agreed and deleted the provisions relating to confidentiality. Qwest Exhibit 15 at 15.

Commission's Finding

The Commission finds this issue has been resolved.

7. Underutilized Trunks

AT&T's Position

AT&T took issue with section 7.2.2.8.13 relating to underutilized trunks. AT&T Exhibit 10 at 16-17. AT&T stated the language "gives Qwest the right to unilaterally determine that the CLEC isn't using its trunks according to Qwest's utilization demands and then allows Qwest to take back the trunks that Qwest wants." *Id.* at 17. AT&T requested that the Commission require Qwest to replace the current language with previous language that was agreed to by the parties and Qwest. *Id.*

Qwest's Position

In its rebuttal testimony, Qwest agreed to include the previous version of section 7.2.2.8.13 as requested by AT&T which requires a CLEC to either resize the trunk group "or provide Qwest with its reasons for maintaining excess capacity." Qwest Exhibit 15 at 15.

AT&T's Post-hearing Position

In its post-hearing brief, AT&T argued that even as revised, the provision was still unacceptable because CLECs are in the best position to determine their future needs for interconnection trunks and Qwest should not be allowed to make the decision unilaterally. AT&T's Brief Regarding Qwest's Interconnection Obligations at 13-14.

Commission's Finding

AT&T has appeared to change its position after the hearing. AT&T does not explain why it changed its position and does not say that the revision as proposed by Qwest is not what AT&T requested in its prefiled testimony. The Commission is not sure whether AT&T is requesting the entire provision be deleted or if it wants further revision.

The provision, with the additional language as originally requested by AT&T (in italics), provides as follows:

> 7.2.2.8.13 If a trunk group is consistently utilized (trunks required over trunks in service) at less than fifty percent (50%) of rated busy hour capacity each month of any consecutive three (3) month period, Qwest will notify CLEC of Qwest's desire to resize the trunk group. Such notification shall include Qwest's information on current utilization levels. If CLEC does not submit an ASR to resize the trunk group *or provide Qwest with its reasons for maintaining excess capacity* within thirty (30) calendar days of the written notification, Qwest may reclaim the unused facilities and rearrange the trunk group. When reclamation does occur, Qwest shall not leave the trunk group with less than twenty five percent (25%) excess capacity. Ancillary trunk groups are excluded from this treatment.

Qwest Exhibit 81 (section 7.2.2.8.13). Qwest's rationale for including this section is that trunk shortages may occur if CLECs significantly underutilize trunk groups. Qwest Corporation's Post-hearing Reply Brief on Compliance with the 14-Point Competitive Checklist at 5.

The Commission finds that Qwest's concern regarding trunk shortages is valid. Moreover, the addition of the italicized language makes it clear that a CLEC need only provide Qwest with a reason as to why it wishes to maintain the excess capacity and Qwest will not reclaim any unused facility. The Commission accepts this section as revised.

8. Separate Trunk Groups

AT&T's Position

AT&T claimed that section 7.2.2.9.3.2 requires CLECs to use separate trunk groups for interLATA, 1+ long distance calls, and for local calls. AT&T Exhibit 10 at 17.

Qwest's Position

Qwest responded that section 7.2.2.9.3.2 explicitly allows for combining of traffic. The section states as follows:

> 7.2.2.9.3.2 Exchange Service (EAS/Local) traffic and Switched Access Traffic including Jointly Provided Switched Access Traffic, may be combined on the same trunk group. If combined, the originating Carrier shall provide to the terminating Carrier, each quarter, Percent Local Use (PLU) factor(s) that can be verified with individual call record detail. Call detail or direct jurisdictionalization using Calling Party Number information may be exchanged in lieu of PLU if it is available.

Qwest Exhibit 81 (section 7.2.2.9.3.2).

Commission's Finding

AT&T did not address this issue in its post-hearing brief. Since the section allows for commingling on the same trunk group, the Commission is at a loss to understand AT&T's point. The Commission finds the section is appropriate as written.

9. Tandem Switch Interconnection Compensation

AT&T's Position

AT&T's final issue in its interconnection testimony concerns compensation associated with interconnection at Qwest's tandem switches, section 7.2.2.9.6 of the SGAT. This issue is addressed in the reciprocal compensation part of the report, infra.

Collocation

Qwest provides collocation as one of the ways to obtain interconnection and access to network elements. Qwest Exhibit 30 at 8. Qwest stated it provides collocation on an unbundled basis and pursuant to the FCC's collocation rules. *Id.* at 8-9. Qwest maintained that it allocates space for equipment on a first-come, first-served basis and takes the demand for collocation into account when forecasting and planning for facility growth. *Id.* at 9. Qwest stated that as of August 31, 2001, Qwest had collocation arrangements with seven CLECs in South Dakota and was providing fourteen units of physical collocation and one unit of virtual collocation. *Id.* at 20.

Qwest stated that it offers the following forms of physical collocation: (1) caged physical collocation; (2) shared caged physical collocation; (3) cageless physical collocation; (4) ICDF collocation; (5) common area splitter collocation; (6) remote collocation; and (7) adjacent collocation. *Id.* at 24-26. Qwest stated it also provides for virtual collocation which "allows a CLEC to deliver equipment to Qwest for Qwest to engineer, install, and maintain on behalf of the CLEC." *Id.* at 38.

Disputed Issues Regarding Collocation

1. Availability of Collocation Facilities and Billing

Midcontinent's Position

In its prefiled testimony, Midcontinent stated it was "concerned about the availability of collocation facilities particularly in wire centers in smaller communities where it intends to offer facilities based services in the future. Much of our planning depends on the accuracy of information supplied during the feasibility study conducted by Qwest as part of a collocation request." Midcontinent Exhibit 38 at 6-7. Midcontinent also stated it was billed for a certain level of DC power for collocation but later discovered it was receiving substantially less power than was billed. *Id.* at 7.

Qwest's Position

With respect to whether there were available facilities in smaller communities, Qwest stated that it was not aware of any particular reason for concern. Qwest Exhibit 31 at 8. Regarding the billing issue, Qwest responded that it had actually provided the level of power that had been ordered but had billed for two 60 amp feeds as opposed to one. *Id.* Qwest stated that it would credit Midcontinent for the overcharges. *Id.*

Commission's Finding

The Commission notes that Midcontinent did not actually point to any instances where facilities for collocation were not available in smaller communities. As Qwest pointed out in its rebuttal testimony, in order to ensure available facilities, Midcontinent should provide a forecast of its collocation plans so Qwest can plan for Midcontinent's future collocation needs. The Commission finds that the billing issue appears to be resolved.

2. Productization of Collocation

AT&T's Position

AT&T contended that Qwest issues policy statements defining how the collocation process is to be accomplished and then demands that CLECs accept these policies even if the polices are contrary to the SGAT and interconnection agreements. AT&T Exhibit 10 at 21. AT&T submitted exhibits to demonstrate the difference between the policy and what is provided for in the SGAT. *Id.* at 22-23. AT&T stated that "Qwest should not be found to be in compliance with Checklist Item 1 until such time as it demonstrates that its collocation policies and performance requirements are, in fact, consistent with its SGAT and interconnection agreements." *Id.* at 24.

Qwest's Position

Qwest stated that through the Change Management Process, Qwest provides notification to CLECs at least 30 days prior to implementing changes that can impact a CLEC and all of the CLEC documentation is available for review and comment by CLECs through the CMP. Qwest Exhibit 31 at 8. With respect to the AT&T exhibits, Qwest claimed that one was a draft document and three others have been revised and agreed to in the CMP meetings. *Id.* at 9. Qwest also noted that the revised documents state that if the terms in the product document differ from an interconnection agreement, then the interconnection agreement prevails. *Id.*

Commission's Finding

The Commission finds that AT&T's concern is valid since, in the past, Qwest has submitted documents in its wholesale Product Catalog that stated that the terms contained are "effective regardless of whether it is explicitly stated in a particular Interconnection Agreement." AT&T Exhibit 10 (attached exhibits B, C, and D). However, AT&T did not refute that these agreements have now been revised. The Commission finds that the specific documents that caused AT&T's concern appear to have been taken care of in the Change Management Process. The Commission will consider whether the Change Management Process is adequate when it reviews that process in a later order.

3. Access to Multiple Tenant Environments

AT&T's Position

AT&T objected to Qwest's SGAT language that treats access to multiple tenant environments as a form of collocation. AT&T Exhibit 10 at 24-25.

Qwest's Position

Qwest explained that it had agreed to change this language but had included the old language in the SGAT filed with its Petition. Qwest Exhibit 31 at 11. Qwest agreed to use the language requested by AT&T which specifically proves that this type of access is not collocation. Qwest Exhibit 31 at 12.

Commission's Finding

The Commission notes that this language is now included in the revised SGAT. *See* Qwest Exhibit 81 (section 8.1.1.8.1). The Commission finds this issue has been resolved.

4. Order Volumes for Collocation Applications

AT&T's Position

AT&T objected to language concerning when Qwest must meet collocation intervals when Qwest receives a number of collocation applications. AT&T Exhibit 10 at 29-30. However, AT&T uses the wrong SGAT language when discussing this issue. *Id.* The language used by AT&T was in the Multi-state Proceeding but Qwest used different language in its SGAT filed with its Petition.

Qwest's Position

Qwest's current language regarding maximum order volumes provides as follows:

> 8.4.1.9 Should Qwest receive an extraordinary number of complex Collocation Applications within a limited time frame, Qwest shall use its best efforts to meet the intervals called for in this Agreement. If Qwest nevertheless fails to meet such intervals, Qwest must demonstrate to the Commission that such failures were due solely to the fact that Qwest received an extraordinary number of complex Collocation Applications within a limited time frame.

Qwest Exhibit 81 (section 8.4.1.9).

Commission's Finding

This language is significantly different from the Multi-state Proceeding language which allowed Qwest to negotiate intervals if it received six or more orders in one week. The Commission finds that this language is reasonable and is an improvement on the language used in the Multi-state Proceeding. Pursuant to this language, the burden is placed on Qwest to prove to the Commission that any delays in intervals were due solely to Qwest's receipt, within a limited time frame, of an extraordinary number of complex applications.

5. Collocation Intervals

AT&T's Position

On a related issue, AT&T objected to Qwest's collocation intervals provisions. AT&T Exhibit 10 at 33. AT&T stated that Qwest's SGAT language requires a CLEC to provide very specific forecasts before Qwest will agree to meet the 90 day collocation interval. *Id.* at 33.

Qwest's Position

In its rebuttal testimony, Qwest stated that it reached a resolution of this issue in Arizona and agreed to change the provisions so that the interval is 90-days even without a forecast, unless Qwest obtains a waiver because of a shortage of space, power, or HVAC. Qwest Exhibit 31 at 22 (language attached as Exhibit MSB-COLLO-12). Thus, Qwest will complete a collocation installation in the 90-day interval for virtual and physical collocation when conditioned space is readily available and will meet the 45-day interval for Interconnection Distribution Frame (ICDF) collocation if an ICDF or space for a new ICDF is available. *Id.* at 24. However, Qwest did not agree that it needs to request a waiver if special conditioning or major infrastructure modifications are required. In that event, Qwest stated that:

> Qwest will provision the collocation within the 120-day interval if the space is available and some conditioning is required (e.g., duct extensions). If a major infrastructure modification is required, Qwest will provide the reason for and the duration of the extended interval to the CLEC as part of the quote. If the CLEC disputes the need for and/or the duration of the extended interval, then Qwest must request a waiver from the Commission.

Id. at 22.

Commission's Finding

The Commission finds that Qwest's revised language on this issue is acceptable and is an improvement on its original language filed in its SGAT with its Petition. The revised language addresses AT&T's concern that an unforecasted request for collocation will be given a longer interval merely because it was unforecasted, even when there was no shortage of space, power, or HVAC.

6. Channel Regeneration Charges

AT&T's Position

AT&T next objected "to Qwest's imposition of a channel regeneration charge when the distance between the CLEC's collocation space and Qwest's network facilities is so great as to require regeneration." AT&T Exhibit 10 at 36. AT&T reasoned that the charge was unreasonable since CLECs have "no control over either the location of their collocation space within Qwest's central office or its relation to Qwest's network facilities." *Id.* AT&T requested that section 8.3.1.9, which allows for channel regeneration charges, be deleted. *Id.*

Qwest's Position

Qwest argued that it should be allowed to charge for channel regeneration when it is unavoidable. Qwest Exhibit 31 at 17. Qwest explained that "[c]hannel regeneration is required when the distance from the collocation space to the Qwest network is of sufficient length to require regeneration. Regeneration enhances the signal being transmitted to ensure that it is strong enough to meet technical requirements." *Id.* In the Multi-state Proceeding, language was added to section 8.3.1.9 which provides that the charges will not apply "if Qwest fails to make available to CLEC: (a) a requested, available location at which regeneration would not be necessary or (b) Collocation space that would have been available and sufficient but for its reservation for the future use of Qwest." Qwest Exhibit 81 (section 8.3.1.9).

Commission's Finding

The Commission finds that the imposition of a channel regeneration charge is appropriate under the circumstances as set forth in section 8.3.1.9. The Commission finds that the language added in the Multi-state Proceeding should alleviate, to some extent, AT&T's concern that Qwest will have no incentive to minimize the need for regeneration charges.

7. Individual Case Basis Pricing for Adjacent and Remote Collocation

AT&T's Position

AT&T also objected to Qwest's pricing of both adjacent collocation and remote collocation on an Individual Case Basis (ICB). AT&T Exhibit 10 at 37. AT&T stated that Qwest should develop standard adjacent and remote collocation elements in order to prevent delay, unjust pricing, and potential discrimination. *Id.* AT&T stated that at a minimum, this issue should be deferred to an appropriate cost docket. *Id.*

Qwest's Position

Qwest responded that it had received zero requests for adjacent collocation and had only minimal activity involving remote collocation across the Qwest region. Qwest Exhibit 31 at 15. Qwest further stated that it will address standardized pricing in the cost proceeding currently pending before the Commission, and has put language in the SGAT which provides that charges for adjacent and remote collocation will be priced on an ICB except where a commission finds that standard pricing elements can be identified and their costs determined. *Id.* (referencing sections 8.3.5 and 8.3.6.)

Commission's Finding

The Commission finds that it will consider this issue in its pending cost docket.

8. Collocation Space Reservation Forfeiture Fee

AT&T's Position

AT&T's final collocation issue related to the collocation space reservation forfeiture fee contained in section 8.4.1.7.4. AT&T Exhibit 10 at 37-38. AT&T opposed requiring CLECs to forfeit the space reservation fee upon cancellation of a collocation space reservation.

Qwest's Position

Qwest stated that it reduced the amount of the penalty from 50% of the nonrecurring reservation fee to 25%. Qwest Exhibit 31 at 20. In addition, Qwest pointed out that the SGAT provision includes a lower cost alternative which allows a CLEC to secure some right to space, but if another CLEC requests space through a collocation application then the first CLEC must either submit an application or a reservation, otherwise it will lose the space. *Id.*

Commission's Finding

The Commission finds that some restrictions on space reservation are necessary in order to prevent a CLEC from reserving space in an attempt to deprive another CLEC or Qwest of the ability to use the space. The FCC allows reasonable restrictions on the warehousing of unused space by CLECs. *See* 47 C.F.R. § 51.323(f)(6). This section provides that "[a]n incumbent LEC may impose reasonable restrictions on the warehousing of unused space by collocating telecommunications carriers, provided, however, that the incumbent LEC shall not set maximum space limitations applicable to such carriers unless the incumbent LEC proves to the state commission that space constraints make such restrictions necessary." The Commission finds the Qwest forfeiture fee is a reasonable restriction, especially in light of the lower cost alternative available to a CLEC.

Commission's Finding for Checklist Item 1

Subject to the Commission's findings regarding OSS, the Commission finds Qwest is in substantial compliance with this checklist item.

CHECKLIST ITEM 11

Section 271(c)(2)(B)(xi) requires Qwest to provide number portability. Number portability is defined as "the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another." 47 U.S.C. § 153(30).

The FCC has set eight performance criteria that LECs must follow when providing number portability. The criteria are:

(1) Supports network services, features, and capabilities existing at the time number portability is implemented, including but not limited to emergency services, CLASS features, operator and directory assistance services, and intercept capabilities;

(2) Efficiently uses numbering resources;

(3) Does not require end users to change their telecommunications numbers;

(4) Does not result in unreasonable degradation in service quality or network reliability when implemented;

(5) Does not result in any degradation in service quality or network reliability when customers switch carriers;

(6) Does not result in a carrier having a proprietary interest;

(7) Is able to migrate to location and service portability; and

(8) Has no significant adverse impact outside the areas where number portability is deployed.

47 C.F.R. § 52.23(a)(1)-(8).

Qwest has chosen to provide local number portability (LNP) through the Location Routing Number (LRN) method. Qwest Exhibit 38 at 8. According to Qwest, LNP is available to 100% of Qwest's access lines in South Dakota. *Id.* at 6. Qwest stated that it had ported 28,440 telephone numbers in South Dakota at the end of February, 2002. Hearing Transcript for April 23, 2002, at 94. Qwest maintained that LRN is consistent with the eight performance criteria as established by the FCC and that Qwest complies with the technical, operational, architectural, and administrative requirements set forth in NANC's Technical and Operational Task Force Report and Architecture Task Force Report which were adopted by the FCC. Qwest Exhibit 38 at 8, 10.

Qwest explained the processing of LNP requests as follows:

> To initiate a number portability request, a CLEC submits a local service request ("LSR") to port the end user's telephone number(s). The LSR can be submitted by facsimile or electronically. When Qwest receives the LSR, Qwest processes the LSR and returns a firm order confirmation ("FOC") to the requesting CLEC. After the CLEC receives the FOC, the CLEC is required to forward a "subscription version" ("SV") to the NPAC indicating its intent to port a telephone number. Qwest also will create an NPAC SV, which will match the CLEC's NPAC SV to port the number. . . . The requesting CLEC activates its NPAC SV on the due date designated in the CLEC's LSR. The NPAC then broadcasts the telephone number(s) with the associated LRN routing information to all of the local number portability databases.

Id. at 15-16.

Qwest stated that it recovers its costs pursuant to a competitively neutral cost recovery mechanism created by the FCC. *Id.* at 17. Under an FCC approved tariff, Qwest is allowed to charge for database queries and assesses monthly end-user LNP charges. *Id.* at 18.

Disputed Issues Regarding Checklist Item 11

1. Provisioning of LNP

FiberCom's Position

At the hearing, Black Hills FiberCom stated that when it first tried to use local number portability, it could only process maybe five or six LNP orders a day per employee but it was acquiring 25 to 60 customers a day.[1] Black Hills FiberCom had to offer one month of free service to attempt to convince customers to change their telephone numbers. *Id.* at 68. FiberCom said this cost its company about $170,000.00. *Id.* If a customer chose to keep his or her telephone number, the customer was charged a monthly fee of $2.00. *Id.* Black Hills FiberCom stated that this showed that even though a service may be listed in Qwest's catalog, it does not mean that Qwest is able to adequately serve a competitor's needs. *Id.* However, FiberCom also stated that Qwest had improved its processes. *Id.* at 67.

Commission's Finding

The Commission finds that this appears to have been a problem that has been resolved. However, the Commission recognizes the point being made by Black Hills FiberCom on this issue and may consider this issue in another portion of its findings in this proceeding.

2. Scheduling of Ported Numbers

AT&T's Position

AT&T brought up the issue of the scheduling of porting numbers in order to prevent any service disruption. AT&T Exhibit 12 at 62-70. The problem occurs when a CLEC requests the porting of a new customer's number and Qwest disconnects its loop before the CLEC's loop is in place, resulting in the loss of telephone service. *Id.* at 62-63. AT&T stated that some of the reasons why this may occur is that customers do not keep their installation appointment, the installers could be delayed, or there are installation problems. *Id.* at 63. In its post-hearing brief, AT&T acknowledged that Qwest's new process, which delays disconnection upon notification by the CLEC, has recently been incorporated in OP-17, but stated that there is no performance data yet for this revised PID.[2] AT&T further asserted in its brief that Qwest had not included the new SGAT language to reflect the new process for delayed disconnection and states that "Qwest refuses to reflect this solution in its SGAT." *Id.* at 40. Moreover, even with the new language, AT&T disagreed with Qwest's use of the words "try to" when describing Qwest's efforts to ensure the service is not disconnected. *Id.* at 41.

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[1] Hearing Transcript for April 29, 2002, at 67. In FiberCom's prefiled testimony, FiberCom stated it had problems with Qwest taking numbers assigned to FiberCom as ported telephone numbers and reassigning those numbers to Qwest retail customers. However, FiberCom chose not to put this testimony into the record.

[2] Response Brief of AT&T Regarding Checklist Item 4 - Unbundled Loops and Checklist Item 11 - Local Number Portability at 38-39. PID OP-17 "[e]valuates the quality of Qwest completing LNP telephone number porting, focusing on the degree which porting occurs without unprovisioning associated disconnects before the scheduled time/date." Qwest Exhibit 71, (attached as Exhibit MCIW 6) at 4-33.

Qwest's Position

In its rebuttal testimony, Qwest stated that it agreed to change the SGAT language to delay the disconnection, upon notification by the CLEC. Qwest Exhibit 39 at 14. Qwest pointed out in its post-hearing reply brief that Qwest's revised SGAT submitted after the hearing includes the language AT&T asserted is missing. Qwest Corporation's Post-Hearing Reply Brief on Compliance with the 14 Point Competitive Checklist at 42-43. Qwest further noted that in its rebuttal testimony, it had already offered to change the words "try to" to "use its best efforts" and that AT&T had not addressed this new language. *Id.*

Commission's Position

A review of Qwest's revised SGAT demonstrates that Qwest has included the language as it offered to do in its reply testimony. *See* Qwest Exhibit 81, (section 10.2.5.3.1). The Commission finds that this language is reasonable, including the words that Qwest will "use its best efforts." Although AT&T stated that the revised PID has not yet produced any results, the Commission notes that AT&T has not reported any Qwest failures that AT&T has experienced in this area. The Commission finds that the issue of disconnects of ported numbers has been satisfactorily resolved by the inclusion of the revised SGAT language.

Commission's Finding for Checklist Item 11

Subject to the Commission's findings regarding OSS, the Commission finds Qwest is in substantial compliance with this checklist item.

CHECKLIST ITEM 13

Section 271(c)(2)(B)(xiii) requires Qwest to provide "[r]eciprocal compensation arrangements in accordance with the requirements of section 252(d)(2)." Pursuant to section 252(d)(2)(A), Qwest must provide reciprocal compensation on "(i) such terms and conditions [that] provide for the mutual and reciprocal recovery by each carrier of costs associated with the transport and termination on each carrier's network facilities of calls that originate on the network facilities of the other carrier; and (ii) such terms and conditions [must] determine such costs on the basis of a reasonable approximation of the additional costs of terminating such calls."

Through its rules, the FCC defines "reciprocal compensation" as an arrangement between two carriers "in which each of the two carriers receives compensation from the other carrier for the transport and termination on each carrier's network facilities of the telecommunications traffic that originates on the network facilities of the other carrier." 47 C.F.R. § 51.701(e).

The FCC defines "transport" as "the transmission and any necessary tandem switching of telecommunications traffic subject to section 251(c)(2) of the Act from the interconnection point between the two carriers to the terminating carrier's end office switch that directly serves the called party, or equivalent facility provided by a carrier other than an incumbent LEC." 47 C.F.R. § 51.701(c). According to Qwest, it offers transport to competitive carriers through Direct Trunked Transport, Tandem Switched Transport, or a combination of the two. Qwest Exhibit 19 at 7. Direct Trunked Transport provides an uninterrupted path between the switches of two different carriers and has a fixed, per month charge and a fixed, per mile charge. *Id.* at 8-9. Qwest stated that it complies with the FCC rule which provides that "[t]he rate of a carrier providing transmission facilities dedicated to the transmission of traffic between two carriers' networks shall recover only the costs of the proportion of that trunk capacity used by an interconnecting carrier to send traffic that will

terminate on the providing carrier's network." *Id.* at 9 (*quoting* 47 C.F.R. § 51.709(b)). Tandem Switched Transport allows calling between a CLEC's switch and a Qwest end office through an intermediate switch. *Id.* at 10.

The FCC defines "termination" as "the switching of telecommunications traffic at the terminating carrier's end office switch, or equivalent facility, and delivery of such traffic to the called party's premises." 47 C.F.R. § 51.701(f). In its SGAT, Qwest has a per minute charge for call termination. Qwest Exhibit 81 (attached Exhibit A). Qwest has also entered into interconnection agreements that use some form of bill-and-keep arrangements, with a provision that allows for conversion to reciprocal compensation when the traffic is unbalanced. Qwest Exhibit 18 at 13-14. With respect to internet-bound traffic, Qwest maintained that it exchanges that traffic at the rates ordered in the FCC's ISP Order. *Id.* at 14 (citing *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Intercarrier Compensation for ISP-Bound Traffic*, CC Docket No. 96-98, Order on Remand/Report and Order, FCC 01-131 (rel. Apr. 27, 2001). Qwest asserted that it also provides a transit service which allows "CLECs to interconnect indirectly with other local carriers using Qwest's facilities. Qwest's transit service allows one CLEC to send traffic to another local carrier's network through Qwest's tandem, thus avoiding the cost of investing in facilities otherwise necessary to interconnect to all other local carriers in a local calling area." *Id.* at 15.

Disputed Issues Regarding Checklist Item 13

1. Compensation for Interconnection at Tandem Switches

AT&T's Position

In its testimony on interconnection, AT&T raised an issue concerning compensation associated with interconnection at Qwest's tandem switches, section 7.2.2.9.6 of the SGAT. AT&T stated that a CLEC should be allowed to interconnect at the local tandem for the same cost it would pay for interconnection at the access tandem if Qwest prefers interconnection at the local tandem. AT&T Exhibit 10 at 19-20. AT&T quoted language from Qwest's Washington SGAT which AT&T stated was adopted in the Multi-state Proceeding.

Qwest's Position

Qwest responded that it accepts the verbatim language drafted by the Facilitator in the Multi-state Proceeding. Qwest Corporation's Post-Hearing Brief on Workshop 1 at 51.

Commission's Finding

The Qwest language provides that "Qwest may propose to provide interconnection facilities to the Local Tandem or End Offices served by the Access Tandem at the same cost to CLEC as Interconnection at the Access Tandem." Qwest Exhibit 81 (section 7.2.2.9.6.) This language differs from the language AT&T states is in Qwest's Washington SGAT. However, AT&T did not dispute in its post-hearing brief that this language resolves the issue regarding compensation. Thus, the Commission considers this issue to be resolved.

2. Treatment of Internet Service Provider Traffic

AT&T's Position

With respect to the treatment of internet service provider traffic, AT&T stated it had reached a consensus on the language with Qwest and requested that the Commission accept the consensus language. AT&T Exhibit 11 at 7.

Qwest's Position

Qwest agreed that it had reached a consensus on the language, although it asserted that this issue is not relevant to checklist approval, since ISP-bound traffic does not fall under the reciprocal compensation obligations. Qwest Exhibit 19 at 3-4.

Commission's Finding

The Commission notes that Qwest has placed the consensual language in its revised SGAT filed following the hearing and, therefore, finds this issue has been resolved. See Exhibit 81 (section 7.3.4).

3. Single Point of Presence

AT&T's Position

AT&T raised concerns regarding section 7.2.2.9.6 and the SPOP product. In essence, AT&T contended that Qwest is attempting to limit a CLEC's ability to interconnect at a single POI or at any technically feasible point in order to reduce Qwest's interconnection and reciprocal compensation costs. AT&T Exhibit 11 at 8-13. AT&T stated that Qwest refuses to accept that "a CLEC may interconnect at any technically feasible point, including a single point of interconnection ("POI"). Qwest refuses to accept that where the CLEC establishes a single POI, Qwest must carry traffic to that POI at its own expense, based on properly apportioned reciprocal compensation for such traffic." *Id.* at 9.

Qwest's Position

Qwest pointed out that its SGAT specifically provides for a single POI per LATA:

> 7.1.2 Methods of Interconnection. The Parties will negotiate the facilities arrangement used to interconnect their respective networks. CLEC shall establish at least one Physical Point of Interconnection in Qwest territory in each LATA the CLEC has local Customers. The Parties shall establish, through negotiations, at least one of the following interconnection arrangements: (1) a DS1 or DS3 Qwest provided facility; (2) Collocation; (3) negotiated Mid-Span meet POI facilities; (4) other Technically Feasible methods of Interconnection.

Qwest Exhibit 81 (section 7.1.2).

Commission's Finding

Given the language in section 7.1.2, the Commission finds that Qwest does not require a CLEC to have more than a single POI per LATA. The Commission finds no changes are needed for this section.

4. Ratcheting of Rates

AT&T's Position

AT&T contended that section 7.3.1.1.2 of Qwest's SGAT "improperly requires CLECs to pay private line rates for interconnection service provided using spare capacity on special access facilities." AT&T Exhibit 11 at 13. AT&T stated that "since certain of the circuits on the special access facility are being used for local interconnection purposes, the Act requires that those circuits be priced at TELRIC rates and not at rates taken from Qwest's non-cost-based, interstate or intrastate private line tariffs." *Id.*

Qwest's Position

Qwest responded that when a CLEC has arranged a special access facility with a portion of it idle, and the CLEC chooses to use the idle portion of transport for local interconnection trunking, that local transport is provided at no charge. Qwest Exhibit 19 at 6. Similarly, Qwest asserted that "Qwest does not assess any charge when a CLEC uses spare capacity to provide local interconnection service on a special access facility that is otherwise being used to provide access service." *Id.* at 6-7. Qwest claimed that proportional pricing schemes are prohibited by the FCC. *Id.* at 5-6. Qwest further noted that in the Multi-state Proceeding, the Facilitator concluded that CLECs can use special access circuits for interconnection, but should continue to pay the tariffed rate for those circuits. *Id.* at 7. Qwest also asserted that its position was consistent with FCC decisions. *Id.* at 5.

Commission's Finding

The Commission finds that Qwest's position on this issue is consistent with current FCC Orders. *See* Supplemental Order Clarification, *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, FCC 00-183 ¶ 22(3) at 13-14 (rel. June 2, 2000); Memorandum Opinion and Order, *In the Matter of Net2000 Communications, Inc. v. Verizon-Washington D.C., Inc.*, File No. EB-00-018, FCC 01-381 (rel. Jan. 9, 2002). Moreover, the Commission agrees with the Facilitator in the Multi-state Proceeding that allowing TELRIC prices on special access circuits may affect the rate system that supports universal service. *See* Exhibit 23 at 104. Thus, the Commission finds that Qwest is not required to allow the use of excess capacity on an existing special access facility as an interconnection trunk at TELRIC prices.

5. IntraLATA Toll Carrier Access Billing

Midcontinent's Position

Midcontinent raised an issue concerning intraLATA toll carrier access billing. Midcontinent Exhibit 38 at 21.

Qwest's Position

Qwest stated that this is not a reciprocal compensation issue. Qwest Exhibit 19 at 13-14. However, Qwest did address the issue and stated it was working with Midcontinent at resolving the problem. *Id.* at 14-15.

Commission's Finding

The Commission finds no action is needed on this issue.

Commission's Finding for Checklist Item 13

Subject to the Commission's findings regarding OSS, the Commission finds Qwest is in substantial compliance with this checklist item.

CHECKLIST ITEM 14 - RESALE

Section 271(c)(2)(B)(xiv) requires Qwest to provide "[t]elecommunications services . . . for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3)." Section 251(c)(4) places the following requirements on Qwest:

> The duty -- (A) to offer for resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers; and (B) not to prohibit, and not to impose unreasonable or discriminatory conditions or limitations on, the resale of such telecommunications service, except that a State commission may, consistent with regulations prescribed by the [FCC] under this section, prohibit a reseller that obtains at wholesale rates a telecommunications service that is available at retail only to a category of subscribers from offering such service to a different category of subscribers.

Under section 252(d)(3), this Commission has the power to determine the wholesale rates on the basis of retail rates, less avoided costs. Qwest must provide services for resale "that are equal in quality, subject to the same conditions, and provided within the same provisioning time intervals that the LEC provides these services to others, including end users." 47 C.F.R. § 51.603(b).

According to Qwest, it provides services for resale in accordance with the Act and FCC rules. Qwest Exhibit 53 at 4-5. Qwest stated that the wholesale rates Qwest charges are the rates determined by the Commission in its arbitration decision between Qwest and AT&T. *Id.* at 5. In addition, Qwest claimed that preordering and ordering processes and functions, as well as maintenance and repair processes and systems for resold services are the same processes, systems, and functions used by Qwest for its retail services. *Id.* at 6.

As of August 31, 2001, Qwest asserted that "Qwest provides 13,937 resold lines, including 5,282 residential lines, 8,650 business lines, and 55 Centrex lines, to eight reseller CLECs in South Dakota. As of the same date Qwest provides 687 resold private lines, including 613 analog, 35 DS0, and 39 DS1 private lines, and three resold Qwest DSL services, to reseller CLECs." *Id.* at 7.

Disputed Issues for Checklist Item 14

1. Indemnification

AT&T's Position

AT&T raised two issues with respect to resale. The first issue concerns indemnification and AT&T proposed indemnity language which AT&T stated would make "Qwest expressly responsible for the service quality it provides to its wholesale customers." AT&T Exhibit 10 at 40.

Qwest's Position

Qwest responded that its current SGAT provisions obligate Qwest to "give credits to reseller CLECs related to the quality of resold services provided to the reseller CLECs, and to reimburse reseller CLECs for fines or penalties to which they are subject based on state service quality rules." Qwest Exhibit 54 at 10. Qwest further stated that it should not have to credit a CLEC for more than the amount a CLEC pays Qwest for the resold service since Qwest has no control over the amount a reseller CLEC chooses to charge its end user customers or pay its end user customers for service problems. *Id.* at 11.

Commission's Finding

As the Commission noted in its discussion on a similar issue regarding indemnification language for interconnection, indemnification is an issue that is properly contained in the General Terms and Conditions sections of the SGAT. The Commission further finds that the language in sections 6.2.2 and 6.2.3 is reasonable and the language is designed to place a reseller CLEC at parity with Qwest's retail services. The Commission notes that in the Multi-state Proceeding, Qwest was required to delete proposed provisions that would prohibit credits or reimbursements to CLECs if the CLEC was not subject to state service requirements or did not pay credits to its end user customers. *See* Qwest Exhibit 23 at 119-120. Given these revisions, the Commission finds the current language is acceptable.

2. *Misdirected Customer Calls*

AT&T's Position

The second issue raised by AT&T concerned when a customer, in error, calls the wrong carrier with questions about service. AT&T Exhibit 10 at 43-35. AT&T stated Qwest should be prohibited "from using the misdirected CLEC end-user calls as a sales opportunity." *Id.* at 45. AT&T requested that the words "seeking such information" be added to section 6.4.1. *Id.*

Qwest's Position

Qwest pointed out in its reply testimony that it had already adopted AT&T's proposed language to section 6.4.1 and had added the words "seeking such information." Qwest Exhibit 54 at 13.

Commission's Finding

The Commission finds this issue is resolved.

3. *Billing Problems*

Midcontinent's Position

Midcontinent raised issues regarding billing problems with resold services, ordering telephone number prefixes for SmartPak service, and notice issues regarding the offering of new retail products. Midcontinent Exhibit 38 at 10-12, 13-15. One of the billing problems concerned Qwest adjusting Midcontinent's resale rate to the amount stated in the Interconnection Agreement even though that rate was no longer valid because it had been changed in the first amendment to the

Interconnection Agreement. *Id.* at 15. Midcontinent stated that Qwest's response to this problem was slow and was reportedly due to Qwest personnel changes and lack of available personnel. *Id.* Midcontinent stated the amount in dispute had grown to over $200,000.00. *Id.* Midcontinent noted that its personnel spent numerous overtime hours reconciling the bills and that the "additional accounting burden has continued for six months to date, unfairly costing us time and money." *Id.* at 16.

In its post-hearing brief, Midcontinent stated that it had "raised a number of issues in its prefiled testimony filed March 18, 2002, which Qwest witnesses pointed out were resolved by the time of the hearing." Midcontinent's Post Hearing Brief at 5. However, Midcontinent went on to say:

> Two significant points should be kept in mind here, the level of Qwest's attention to and resolution of issues increased markedly as the time of the hearing approached, and Midcontinent's motive for mentioning many of these items was to show the evolution of Qwest cooperation and performance from first contact with Midcontinent to more recent interaction between the two.

Id.

Qwest's Position

Qwest claimed that the prefix problem arose when Midcontinent ordered new NXX's prior to their availability. Qwest Exhibit 54 at 4. With respect to the billing issues, Qwest now pulls a random 10% sample of Midcontinent's resale orders and audits them. *Id.* Qwest said that it does provide "written notice to reseller CLECs in South Dakota advising of new Qwest retail products and services in advance of or on the date the service is available to Qwest retail end users." *Id.* at 5.

Commission's Finding

It would appear that Qwest has addressed Midcontinent's concerns regarding resale at this time. However, as it noted in its decision on checklist item 8, the Commission shares Midcontinent's concern that Qwest's attention to a CLEC's concerns may lessen if granted section 271 approval. The Commission may address this concern in another portion of its findings regarding this proceeding.

Commission's Finding for Checklist Item 14

Subject to the Commission's findings on OSS, the Commission finds Qwest is in substantial compliance with this checklist item.

Verification of Compliance With This Order

The Commission finds that no compliance filing is needed for this order since the Commission has not ordered any changes regarding these checklist items.

It is therefore

ORDERED, that the Commission finds Qwest in substantial compliance with the checklist items as listed above, subject to the Commission's review of the OSS results.

Dated at Pierre, South Dakota, this 19th day of September, 2002.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addressed envelopes, with charges prepaid thereon.

By: Delaine Kolbo

Date: 9/19/02

(OFFICIAL SEAL)

BY ORDER OF THE COMMISSION:

JAMES A. BURG, Chairman

PAM NELSON, Commissioner

ROBERT K. SAHR, Commissioner