

April 11, 2002

**AT&T's response to Qwest's binding response – April 17, 2002
AT&T would like to schedule a review of this process for April 26th.**

Terry Bahner
Supervisor
AT&T Local Services Access Management
1875 Lawrence St.
Denver, CO 80202-1847

**SUBJECT: Qwest's Change Request Response - CR # PC 030802-1
Local Service Freeze Removal for Residence and Business Customers**

Following is the response to the escalation on this CR.

Escalation Description Presented

The inability to remove the local service freeze from the customer's residential account has daily impacted AT&T Broadband's ability to port the number and to submit an LSR that will not be rejected nor issued a jeopardy condition after the FOC.

Desired CLEC Resolutions:

1. The end customer should make only one call to remove the local service freeze with the CLEC on the line.

The number 877-719-4294 will remain in place for the removal of Local Service Freezes. Qwest is adding people and processes so higher volumes of calls can be handled. The CLEC, with the end user on the line, may call this number to remove the Local Service Freeze, which will ensure efficiency in the process. The end user must be on the line. This means that Qwest will have a dedicated number, line, and staff for removal of Local Service Freezes.

AT&T Broadband has experienced long hold times using 877-719-4294 prior to 4/11/2002. What processes and what are the performance measurements Qwest has established to reduce and monitor the hold times? Since AT&T has the end customer on hold, we expect the hold time not to exceed 1 minute.

2. The CLEC should be able to send the LSR immediately after the freeze has been removed without fear of rejection or a jeopardy condition issued after the FOC.

Qwest agrees to accept LSRs the same day the Local Service Freeze is removed as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field.

AT&T believes the above statement needs clarification. "Qwest agrees to accept LSRs the same day the end customer calls to remove the Local Service Freeze as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field. Qwest will not reject nor issue a jeopardy condition code on a LSR based on the local service freeze if the R order number is in the Remarks field or in the RORD field."

As before, the CLEC can submit an LSR without the R order number the day following the request for the removal of the Local Service Freeze.

Will the one call by the customer consider all the TNs? Are different R order numbers required to port a multi-line account? Will the Qwest agent verify the freeze has been lifted off of all TNs so multiple calls are not required? Will the CLEC submitting the LSR need to include all R order numbers if more than one exists?

3. An escalation process should be in place to resolve LEFV issues.

Qwest has established a point of contact for CLEC Local Service Freeze escalations in the Interconnect Service Center at 888-796-9087 (option 1 for resale, option 2 for LNP). The Service Delivery Coordinators at that number have been trained to assist with Local Service Freeze related issues.

Qwest is using the normal LNP escalation process here as a point of contact for CLEC Local Service Freeze escalations at the ISC. Before 4/11 AT&T had great difficulty resolving LEFV issues using the ISC team. What has changed? It doesn't appear a true SPOC has been identified to help resolve outstanding LEFV issues. Are the SDCs able to look at the repository to verify the LEFV has been removed? How does Qwest anticipate this group can now help us?

4. Qwest should suspend the LEFV process in the remaining states it offers LEFV as a feature until a workable process is agreed upon by the CLEC community.

Qwest will not suspend Local Service Freeze. Qwest believes that its preexisting processes were sufficient. In any event, the new processes outlined in this letter will further assure compliance. Qwest also is committed to effecting reasonable processes on a continuing basis, as needed. Qwest's policies and procedures meet FCC and state-specific rules, and Qwest has and is responding to feedback from CLECs regarding its policies and procedures. For example,

- Qwest has established one telephone number with a staff dedicated to this function. A CLEC with the end user may use the (877) 719-4294 number to expedite removal of a Local Service Freeze, just as AT&T requested.
- Qwest will accept LSRs the same day the Local Service Freeze is removed as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field.
- **Clarification - "Qwest agrees to accept LSRs the same day the end customer calls to remove the Local Service Freeze as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field.**

Qwest will continue to effect reasonable processes to accommodate CLEC requests. Qwest agrees to do problem solving working sessions with AT&T if needed (and with other CLECs upon request).

AT&T is very disappointed Qwest will not lift the freeze. Qwest's "preexisting processes" were not sufficient. Examples were provided to Qwest that clearly showed the process was broken in several of Qwest's organizations. The process continued to operate poorly even after AT&T submitted the change request through the CMP Product and Process forum as an exception. AT&T Broadband continued to experience additional trouble after multiple conference calls, Qwest's own first response to the CR and an escalation of the CR. AT&T believes Qwest's "preexisting processes" were not adequate and showed a lack of planning by Qwest. It appears Qwest rolled out the LEFV feature to the end customers with very little thought on the impact to them and the Wholesale market.

While AT&T welcomes any improvement on the existing process to remove the local service freeze, its clear Qwest never intended to collaborate with AT&T to resolve the issue. Subject matter experts were never available even upon our request. It took Qwest almost a week to offer basically the same process already in place without any noticeable changes or guarantees the process to remove the LEFV has been improved.

Below are responses to issues brought up on the CLEC Change Request Follow-up Meeting on April 4, 2002.

Issue Presented - 2.2

AT&T commented that using Aegis is currently their only option, as when they call the Qwest Business Offices they be on hold for long periods and the staff do not appear to be familiar with this process. AT&T asked that the 866-311-0222 number remain in effect. Qwest agreed that the Aegis number will remain in effect until this issue is resolved

This issue has been resolved by continuing the 877-719-4294 number. The 866-311-0222 should not be used to remove Local Service Freezes.

AT&T expected Qwest to inform the CLEC community when 866-311-0222 was no longer a viable option in removing the LEFV. Qwest did not which continued to adversely affect AT&T Broadband's daily ability to port a customer who wanted our service.

Issue Presented - 2.3

AT&T stated that the Qwest web site states the Local Service Freeze can be removed immediately, which has not been their experience. Qwest reiterated that it is effective the same day, but the LSR has to be submitted the next day. AT&T then asked Qwest to reduce the process time by one business day. Qwest took an action to reply to this.

The April 3, 2002 version of the PCAT states the order to add or remove a Local Service Freeze is issued and effective the same day the request is received.

Qwest agrees to accept LSRs the same day the Local Service Freeze is removed as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field. A process was put into place on March 22, 2002, which allows the CLEC to include the R order number on their LSR. The Qwest Service Delivery Coordinator (SDC) will check for the R order and reject the LSR only if none exists.

Clarification: "Qwest agrees to accept LSRs the same day the end customer calls to remove the Local Service Freeze as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field. Qwest will not reject nor issue a jeopardy condition code on a LSR based on the local service freeze if the R order number is in the Remarks field or in the RORD field."

As before, the CLEC can submit an LSR without the R order number the day following the request for the removal of the Local Service Freeze.

Qwest may have implemented a process on March 22, 2002 but the end-results were inconsistent in Qwest's handling of AT&T Broadband's LSRs. AT&T believes Qwest agents were neither properly notified nor trained. What has changed at Qwest to ensure that this process will work so that AT&T's LSRs will not be rejected or subject to a jeopardy notification?

Issue Presented - 2.4

AT&T stated that their desire is for Qwest to lift the Local Service Freeze so the LSR can be submitted the same day.

Qwest agrees to accept LSRs the same day the Local Service Freeze is removed as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field.

As before, the CLEC can submit an LSR without the R order number the day following the request for the removal of the Local Service Freeze.

Clarification: "Qwest agrees to accept LSRs the same day the end customer calls to remove the Local Service Freeze as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field. Qwest will not reject nor issue a jeopardy condition code on a LSR based on the local service freeze if the R order number is in the Remarks field or in the RORD field."

Issue Presented - 2.5

Eschelon asked if the LSR can be submitted using the R-Order number in the PON field? Qwest believed this would work. Qwest will investigate and report back.

The R order number can be included in the Remarks field or in the RORD field.

Issue Presented - 2.7

Eschelon stated that Qwest could go to the State Commissions and seek a waiver on the Local Service Freeze. Eschelon also asked about a written process to remove the Freeze. Besides the presence of a form, Eschelon wanted to know whether there was a back end process in place to deal with this and what had been communicated to the CLECs? Qwest took an action to respond to this.

Qwest will not seek a waiver on Local Service Freeze.

Qwest Retail end user customers may have their Local Service Freeze removed by contacting Qwest in writing. Since there is no direct customer contact (voice), the customer is not provided with a due date and R order number. We will include information regarding this process in the next PCAT update. **Use of the web-based freeze removal (electronic signature) is currently being developed.**

AT&T would like to see this tool generate the R order number in real time. This way the end customer will be able to provide the R order number immediately without jeopardizing his desired due date when choosing another local service provider.

Issue Presented - 2.8

AT&T reiterated they are seeking:

- A. To only have to make one call**
- B. To send in their LSR without rejection**
- C. A clear and concise escalation process**
- D. Have the Aegis number available on Saturdays**

A. The number 877 719 4294 will remain in place for the removal of Local Service Freezes, as set forth above.

B. Qwest agrees to accept LSRs the same day the Local Service Freeze is removed as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field, as set forth above.

Clarification: "Qwest agrees to accept LSRs the same day the end customer calls to remove the Local Service Freeze as long as the submitting CLEC includes the R order number of the Local Service Freeze removal order in the Remarks field or in the RORD field. Qwest will not reject nor issue a jeopardy condition code on a LSR based on the local service freeze if the R order number is in the Remarks field or in the RORD field."

As before, the CLEC can submit an LSR without the R order number the day following the removal of the Local Service Freeze.

C. Qwest has established a point of contact for CLEC Local Service Freeze escalations in the Interconnect Service Center at 888-796-9087 (option 1 for resale, option 2 for LNP). The Service Delivery Coordinators at that number have been trained to assist with Local Service Freeze related issues.

D. Qwest will not be providing access for Local Service Freeze removals on Saturdays. The timeframes for adding or removing Local Freeze mirror the timeframes for adding or removing PIC/LPIC freezes.

AT&T wants to be able to remove the local service freeze on Saturdays. If the ISC has the tools to resolve through Qwest's escalation process any LEFV issues, it also has the ability to remove the freeze. AT&T believes the Local service freeze is in a category of its own for the Wholesale market and the CLEC community at large. It should not depend on being a "mirror" of other Qwest features.

Issue Presented - 2.9

AT&T also stated they continue to see large numbers of customers with the Freeze implemented, who believe they have never asked for it on their account. Qwest replied that they are continuing to

investigate the AT&T examples and have already found most of the TPVs for the AT&T examples. AT&T replied they have heard this before but have yet to receive any validation from Qwest. AT&T stated the implementation of a freeze is not clear as too many customers are not aware of this action on their account. Qwest will provide validation to Terry Bahner (AT&T).

AT&T has provided Qwest with a list of names and numbers they believe were improperly frozen to their local exchange carrier. AT&T has complained that Qwest has not provided the TPV or other proof that the local service freeze was properly imposed.

Qwest investigated and analyzed all of the affected accounts, and it has no reason to believe any account was frozen without the customer's request when the freeze was imposed.

Qwest's process to add a Local Service Freeze includes several steps to ensure the end user customer is aware of the freeze being added to their account, including the required third-party verification. If an end user indicates a desire to establish a freeze, they are transferred to a Third-Party Verifier (TPV) who asks the customer for the Billing Name on the account, Billing Address, the last four digits of their Social Security Number, and their date of birth. In addition, they ask if the caller is over 18 years old and is responsible for the account, and if they have permission to place the local service freeze on each specific line of the account.

Did Qwest find a TPV for each customer AT&T identified as having the LEFV feature?

Issue Presented - 2.10

AT&T also offered to support an application by Qwest to the commission to get a waiver on Local Service Freeze until this issue is resolved. (Qwest should voluntarily cease offering Local Service Freeze in all states where it is currently available until such time that policies and procedures are developed and implemented to apply and remove such freezes.)

For the reasons stated above, Qwest will not seek a waiver on Local Service Freeze.

Since AT&T submitted this CR, Qwest has worked diligently on the Local Service Freeze process. We feel we have been responsive to AT&T and their requests.

In response to this CR, we have introduced an 800 number as a single point of contact for Local Service Freeze removal, included step-by-step process instructions in the PCAT, implemented a manual process for checking for R orders so the LSRs can be issued the same day the Local Service Freeze is removed, as well as reviewed training with employees. We are also doing weekly quality checks.

AT&T expects to be given at least 31 days to review any local service freeze process before updates to the PCAT are made by Qwest. In addition, AT&T would expect to have the ability to negotiate the changes to the PCAT before they are posted on the web. We consider this at a minimum a LEVEL 3 notice under the redesigned CMP.

Please feel free to contact your Qwest Service Manager with any current examples or issues you need addressed.

Sincerely,

Harriett Berry
Qwest Senior Process Analyst



cc: Christie Doherty, Qwest, Vice President, Customer Service
cc: Sue Burson, Qwest, Director Process Management