

CPAP Workshop – Qwest Presentation Outline

10 Nov 2009

Past, Present, and Future Purpose of the CPAP

- **Past Purpose: Provide “Probative Evidence” that Markets Will Remain Open**
FCC Qwest 9-State 271 Order, ¶ 440:
 - ♦ PAPs “provide assurance that the local market will remain open”
 - ♦ Nevertheless PAPs are “**not a requirement for section 271 authority**”
 - ♦ A PAP “would be probative evidence that the BOC will continue to meet its section 271 obligations”
- **Present Purpose: Conditions Now Exist for Termination of CPAP (Section 18.11)**
 - ♦ Markets have remained open and now are irreversibly open
 - ♦ Nevertheless **Qwest remains obligated and committed to 271 requirements for non-discrimination** and has demonstrated its willingness and ability to comply
- **Future: Qwest Proposes a Service-Focused Approach to Performance Assurance**
 - ♦ Qwest values CLECs as important co-carriers in retaining customers on network
 - ♦ Future purpose of wholesale performance assurance is carrier-to-carrier matter

Phase-out of the CPAP

- This is the **explicit objective of the current review** (per CPAP Section 18.11)
- Qwest’s proposal is to **replace CPAP**, rather than totally phase-out CPAP

Revisions to the Current CPAP

- Qwest offers new framework for future performance assurance – e.g., “CPAP-2”
- Only one CLEC, Integra, has filed any objections to this in Colorado
- CPAP-2 focuses on identifying and resolving service problems
- CPAP-2 focuses on the most important measurements and products (top 90+%)

The Path Forward

- Establish a sunset date (e.g., December 31, 2010) for current CPAP
- Start carrier-to-carrier discussions on a future assurance framework
- Effective (e.g.) January 1, 2011, Qwest offers CPAP-2 if new framework not yet final
- Qwest continues to provide performance reporting and monitoring per current CPAP metrics through (e.g.) June 30, 2011

Qwest 271 “CPAP-2”

Executive Summary of Concepts

- **Purpose** – Replace CPAP with an improved performance assurance plan:
 - ◆ Focusing on meeting standards and identifying/resolving problems in key areas of service
 - ◆ Rather than focusing on penalties
- **Context**
 - ◆ A voluntary offer that goes beyond statutory requirements of the 1996 Telecom Act
- **Major Plan Components**
 - ◆ **Product List** – Analog, 2-wire non-loaded, ADSL, and EEL-DS1 Loops, which are:
 - Products **most relevant** to **keeping markets open**
 - Products **most reflective of Qwest’s performance in key areas of service quality**
 - ◆ **Measurements** – Address Ordering, Installation, Maintenance, and Repair
 - ◆ **Standards and Triggers** – Focus resources of Qwest and CLECs on key service areas
 - ◆ **Response Process** – Focuses on resolving problems identified by standards and triggers
- **Details** – **Cover 94% of Provisioning and 98% of Repair Activity in Colorado**
 - ◆ **Products**
 - Unbundled Analog Loops
 - Unbundled 2-Wire Non-loaded Loops
 - Unbundled DS1-Capable Loops
 - Enhanced Extended Loops – DS1 (EEL-DS1)
 - ◆ **Key Measurements** (total of six metrics)
 - **Ordering** – Firm Order Confirmations (FOCs) on Time
 - **Installation** – Installation Commitments Met and Installation Interval (2 metrics)
 - **Maintenance** – Trouble Rate
 - **Repair** – Troubles Cleared within Target Intervals and Mean Time to Clear (2 metrics)
 - ◆ **Standards and Triggers**
 - **Standards:** Foundation of minimum expectations, by measurement
 - **Triggers:** Thresholds to guide responsive efforts to maintain the service quality – categorized in escalating Response Process tiers, “Level 1” through “Level 3”
 - ◆ **Response Process**
 - **Day-to-day Level** – Qwest’s good-faith effort to meet or better the standards
 - **Level 1** – Enhanced, focused attention on confirmed problems and **defined action plans**
 - **Level 2** – Improved action plans with **internal escalation** to vice president (VP) level
 - **Level 3** – Updated action plans, continued internal VP-level attention, **external escalation** (VP-to-VP communication with CLECs, and frequent status postings)