

mzulevic@covad.com on 01/14/2002 05:39:09 PM

To: mzulevic@covad.com

cc:

Subject: Covad --- CR#PC101201-1 --- P

Escalation  
Company: Covad  
CR#: PC101201-1  
Status Code: P

Qwest Action Requested:  
establish interim solution

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Description:  
Shared Loop Data Parameters

History of Item:  
Submitted by John Moham on behalf of Covad on CR dated October 8, 2001.  
Qwest initial response dated December 5, 2001 provided by Cliff  
Dinwiddie on behalf of Qwest. Formal discussion and denial by Qwest at the  
December CMP meeting in Denver.

Reason for Escalation / Dispute:  
Covad believes Qwest has an obligation to deliver loops for Line Sharing  
that are free from electrical defects and are as represented by the  
Qwest Raw Loop Data tool. Further, Covad believes Qwest should deliver loops  
that meet Rule (4 CCR) 723-18 of the State of Colorado Rules Regulating  
Telecommunications Service Providers and Telephone Utilities and ensure  
that all loops delivered for line sharing meet these requirements prior  
to delivery to CLECs. These standards should be used throughout Qwest  
until satisfactory ANSI standards are developed.

Business Need and Impact:  
Covad continues to receive loops for line sharing that do not meet the  
minimum standards established by the Colorado Commission and are  
subsequently unable to provide data services.

Desired CLEC Resolution:  
Qwest must complete the necessary testing prior to loop delivery, that  
will ensure the absence of electrical defects and provide a loop that meets  
the expectations established by the Raw Loop Data Tool. These standards

should meet or exceed the loop requirements of the State of Colorado. This can Be accomplished by performing a pre-delivery MLT test and either repairing any deficiencies or delivering the service on another cable pair that meets these standards. This is the "best practice" currently used by Verizon and SBC Pac Bell. This solution addresses Qwests concerns about providing CLECs with MLT access prior to loop delivery.

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