Analysis
of
Qwest's Performance Assurance Plans
Final Report
Appendices

Prepared for:

The Qwest Regional Oversight Committee

By:

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Appendix A: PAP Structure

A. Introduction

Although many of the features of the PAPs are common throughout the 11 participating states, there are some significant differences among them. This appendix provides a summary of the provisions in the most common ("standard") PAP structure, and a listing of some of the key differences that Liberty has identified from that structure in the PAPs of the participating states.

The following list provides PAP versions Liberty understands to be effective in the participating states as of the date of this report:

- Arizona: SGAT Fourteenth Revision, Fourth Amended Exhibit K, dated June 22, 2007
- Colorado: SGAT Ninth Revision, Sixteenth Amended Exhibit K, dated January 2, 2009[1]
- Idaho: SGAT Third Revised, Sixth Amended Exhibit K, dated June 26, 2007
- Iowa: SGAT Sixth Revision, Fifth Amended Exhibit K, dated June 26, 2007
- Montana: SGAT Fifth Revision, Fourth Amended Exhibit K, dated November 30, 2004
- Nebraska: SGAT Sixth Revision, Fifth Amended Exhibit K, dated June 26, 2007
- New Mexico: SGAT Eleventh Revision, Fifth Amended Exhibit K, dated June 26, 2007[2]
- North Dakota: SGAT Exhibit K, dated June 22, 2007
- South Dakota: SGAT Exhibit K, dated June 22, 2007
- Utah: SGAT Seventh Revision, Fifth Amended Exhibit K, dated June 26, 2007[3]
- Wyoming: SGAT Sixth Revision, Fifth Amended Exhibit K, dated June 26, 2007.

[1] This version of the CPAP became effective after the end of the Study Period for Liberty's analysis (January 2004 through October 2008).

[2] This version of the New Mexico PAP became effective on May 1, 2009, after the end of the Study Period for Liberty's analysis.

[3] In an order in Docket No. 07-049-31, issued June 30, 2008, the Public Service Commission of Utah approved the changes to the Utah PAP recommended by the 2007 Stipulation, but only for those CLECs who were party to the Stipulation. This amended version of the Utah PAP is the SGAT Seventh Revision, Fifth Amended Exhibit K, dated June 26, 2007. More recently, in an order in Docket No. 08-049-50, issued February 4, 2009, the Commission extended the applicability of the 2007 Stipulation changes to all CLECs. This order also added changes to recognized Qwest's replacement of the EDI interface by an XML interface. These changes are not yet reflected in the SGAT Seventh Revision, Fifth Amended Exhibit K.

B. Standard PAP Structure

1. Introduction and Plan Structure (Sections 1 and 2)

a. CLECs and Qwest voluntarily agreed to the terms.

b. It is a two-tiered, self-executing plan.

c. Tier 1 payments are made to each participating CLEC if Qwest does not provide performance to the CLEC (as determined by the included PID measures) which is at parity with a retail standard or does not meet a benchmark, depending on the measure.

d. Tier 2 payments are made to a special state fund if Qwest does not provide, at a CLEC-aggregate level, parity with a retail standard or does not meet a benchmark.

e. Payment is generally on a "Per Occurrence" basis: a set dollar amount times the "number of non-conforming service events." For some measures, payment is on a "Per Measurement" basis: a set dollar payment.

f. Those measures designated as Per Occurrence are listed in Attachment 1, which includes the following 27 measures:

(i) GA-7 Timely Outage Resolution following Software Releases (Tier 2)

(ii) PO-3 LSR Rejection Notice Interval (Tier 1)

(iii) PO-5 Firm Order Confirmations On Time (Tier1/Tier2)

(iv) PO-6 Work Completion Notification Timeliness (Tier 1)

(v) PO-7 Billing Completion Notification Timeliness (Tier 1)

(vi) PO-8 Jeopardy Notice Interval (Tier 1)

(vii) PO-9 Timely Jeopardy Notices (Tier 1)

(viii) PO-16 Release Notifications (Tier 2)

(ix) PO-20 Manual Service Order Accuracy (Tier1)

(x) OP-3 Installation Commitments Met (Tier1/Tier2)

(xi) OP-4 Installation Intervals (Tier1/Tier2)

(xii) OP-5a, b New Service Quality (Tier1/Tier2)

(xiii) OP-6 Delayed Days (Tier1/Tier2)

(xiv) OP-8 Number Portability Timeliness (Tier1/Tier2)

(xv) OP-13a Coordinated Cuts On Time – Unbundled Loops (Tier1/Tier2)

(xvi) OP-17 LNP Disconnect Timeliness OP-17 (Tier1/Tier2)

(xvii) MR-3 Out of Service Cleared within 24 hours (Tier 1)

(xviii) MR-5 All Troubles Cleared within 4 hours (Tier 1)

(xix) MR-6 Mean time to Restore (Tier 1)

(xx) MR-7 Repair Repeat Report Rate (Tier1/Tier2)

(xxi) MR-8 Trouble Rate (Tier1/Tier2)

(xxii) MR-11 LNP Trouble Reports Cleared within Specified Timeframes (Tier1/Tier2)

(xxiii) BI-1 Time to Provide Recorded Usage Records (Tier1/Tier2)
(xxiv) BI-3 Billing Accuracy-Adjustments for Errors (Tier 1)
(xxv) BI-4 Billing Completeness (Tier1/Tier2)
(xxvi) NI-1 Trunk Blocking (Tier1/Tier2)
(xxvii) NP-1 NXX Code Activation (Tier1/Tier2)

g. Two additional measures are also effectively Per Occurrence measures: the collocation measures CP-2 (Collocations Completed within Scheduled Intervals) and CP-4 (Collocation Feasibility Study Commitments Met). Payments for these two measures are specified in Section 6.3, Table 3.

h. Those measures designated as Per Measurement are listed in Section 7.4, which includes the following eight measures:

(i) GA-1: Gateway Availability - IMA-GUI (Tier2)
(ii) GA-2: Gateway Availability - IMA-EDI (Tier2)
(iii) GA-3: Gateway Availability – EB-TA (Tier2)
(iv) GA-4: System Availability – EXACT (Tier2)
(v) GA-6: Gateway Availability – GUI-Repair (Tier2)
(vi) PO-1: Pre-Order/Order Response Times (Tier2)
(vii) OP-2: Call Answered within Twenty Seconds – Interconnect Provisioning Center (Tier2)
(viii) MR-2: Calls Answered within Twenty Seconds – Interconnect Repair Center (Tier2).

i. Payments also escalate based on the number of months of non-conforming performance.

j. For parity measures, the plan uses statistical scoring using z-scores to assure that the difference is significant.

k. For benchmark measures, a "stare and compare" approach is used.

2. Performance Measurements (Section 3)

a) Designated (in Attachment 1) as High, Medium, or Low and either Tier 1, Tier 2, or both Tier 1 and Tier 2.

b) For any benchmark or non-interval parity performance measure, the "One Allowable Miss Rule" applies (Section 3.1.2): one miss is allowable when the results would otherwise require 100 percent performance and if

i) At the CLEC-aggregate level, the performance standard is met

ii) The CLEC-aggregate performance must be 100 percent to meet the standard but the standard is met after applying one allowable miss at the aggregate level.

c) Some measures are designated as not automatically subject to the payment mechanisms of the PAP but subject to the Reinstatement/Removal Process. Currently, there are 13 such PID measures (Section 3.2):

i) GA-3 Gateway Availability EB-TA;

ii) GA-4 System Availability EXACT

iii) GA-7 Timely Outage Resolution following Software Releases

iv) PO-3 LSR Rejection Notice Interval

v) PO-5D Firm Order Confirmations (FOCs) On Time (ASRs for LIS Trunks)

vi) PO-7 Billing Completion Notification Timeliness

vii) PO-8 Jeopardy Notice Interval

viii) PO-16 Timely Release Notifications

ix) OP-17 Timeliness of Disconnects Associated with LNP Orders

x) MR-11 LNP Trouble Reports Cleared within Specified Timeframes

xi) BI-4 Billing Completeness

xii) NI-1 Trunk Blocking

xiii) NP-1 NXX Code Activation

d) In the Reinstatement/Removal Process (Section 3.3), if any sub-measure of the PID does not meet the standard for three consecutive months, it is reinstated and will remain in the PAP until the sub-measure has met the standard for three consecutive months. For this determination, the PID will be evaluated at the lowest level of product aggregation on a CLEC-aggregated (or the equivalent) basis. Retroactive payments including interest (at the prime rate) will be made.

3. Statistical Tests (Sections 4 and 5)

a. A modified Z-test will be made for average and percentage measures, when the sample size is greater than 30, with non-conformance defined by the calculated Z-score larger than the critical Z-scores (Section 4.2).

b. A permutation test will be used for sample size less than 30.

c. Qwest will be in conformance with benchmark standards when the performance exceeds the benchmark (Section 4.3), subject to the one-allowable miss rule (Section 3.1.2).

d. The critical Z-scores vary with sample size (Table 1 in Section 5), ranging from 1.645 (CLEC sample size < 151) to 4.3 (sample size >3000) [1.645 for 1-150, 2.0 for 151-300, 2.7 for 301-600, 3.7 for 601-3000, 4.3 above 3000]. A special critical Z-score (1.04) applies to LIS Trunks, UDITs, Resale, UBL-DS1 and DS-3 (OP-3, OP-4, OP-5A, OP-6, MR-5, MR-7, and MR-8) when the sample size < 11, except for examining consecutive month misses and Zones (Zone1 and Zone 2 are combined instead).

e. For permutations tests, the significant level of the test will be .05 when the critical Z-score is 1.654, and .15 when the critical Z-score is 1.04, as specified in the rule above (Section 4.3.1).

4. Tier 1 Payments (Section 6)

a. Payment amounts depend on whether the measure is designated as High, Medium, or Low.

b. The payment amounts are calculated and paid monthly using the dollar amounts per occurrence or per measure shown in Table 2 (Section 6). The details of how to perform the calculations are given in Section 8.2 (per-occurrence PIDs) and Section 8.3 (per-measurement PIDs). These amounts escalate based on the number of consecutive months of non-conformance. The payments range from $150(H)/$75(M)/$25(L) per occurrence in month 1 to $800(H)/$600(M)/$400(L) per occurrence in month 6 and then increase $100/mo in all three categories (H, M, L) for every month of non-conformance thereafter. Once conformance is reached after an escalation in payments, the amounts de-escalate based on the number of consecutive months of conformance (Section 6.2.2).

c. Except for BI-3A, the PIDs listed in Attachment 2 are subject to a monthly cap per CLEC, shown in Table 2. (These measures are BI-1, BI-3B, and BI-4.) The caps range from $25K(H)/$10K(M)/$5K(L) in month 1 to $150K(H)/$60K(M)/$30K(L) in month six and continue to escalate by $25K(H)/$20K(M)/$5K(L) for every month after that. For BI-3A (Section 6.2.3), the payments are based on size of the bill adjustments with the amounts and caps given in Table 2A. No payments are required for adjustments less than $1. The per occurrence payments range from $1 for adjustments $1 - $199.99 up to $25 for adjustments $100K and over. The corresponding caps for the same adjustment levels range from $200 to $25K.

d. For collocation (Section 6.3), payments are based on CP-2 and CP-4 and depend on the number of days the collocation jobs (CP-2) or collocation feasibility studies (CP-4) are late, with payments shown in Table 3. The payments range from $150/day for completion dates 1 to 10 days late to $1K/day for completion dates more than 40 days late. The corresponding payments for feasibility studies range from $45/day to $300/day.

e. A minimum payment is made at the end of each year to CLECs with annual ordering volumes of no more than 1,200 by adding amounts specified in Table 4 for each month in which there is at least one payment to that CLEC. (See Section 6.4) In Table 4, there is no specified minimum payment amount if the total monthly payment is less than $200. The minimum payment is $1500 for total monthly payments between $200 and $800, $2000 for total monthly payments between $801 and $1400, and $2500 for total monthly payments over $1400. If the payments for the year are less than the amount specified in Table 4, Qwest will make an additional payment equal to the difference.

5. Tier 2 Payments (Section 7)

a. Tier 2 per-occurrence measures must have at least 10 data points per month to be eligible for payments.

b. Payment amounts depend on whether the measure it is designated as High, Medium, or Low. The details of how to calculate the payments are provided in Section 9.0.

c. Non-conformance is based on aggregate CLEC results and follows the rules in Section 4.2 (parity measurements) and Section 4.3 (benchmark measurements), except that a critical Z-score of 1.645 is used for all parity measures except MR-2 and OP-2.

d. Except for region-wide Per Measurement measures (Section 7.4), Tier 2 payments depend on performance in multiple months as follows:

   i. For Tier 2 measurements with Tier 1 counterparts, payments are made when there are three consecutive months of non-conformance or, if two out of three months for the 12-month period are non-conformance, in the second consecutive month.

   ii. For Tier 2 measurements without Tier 1 counterparts, payments are made when there are three consecutive months of non-conformance or, if two out of three months for the 12-month period are non-conformance, in the current month.

e. Some Tier 2 PIDs are calculated on a region-wide basis (Section 7.4). The payments for these measures are based on Table 6. The measures are:

   i. GA-1 Gateway Availability – IMA-GUI

   ii. GA-2 Gateway Availability – IMA-EDI

   iii. GA-3 Gateway Availability – EB-TA

   iv. GA-4 Gateway Availability – EXACT

   v. GA-6 Gateway Availability – GUI-Repair

   vi. PO-1 Pre-Order/Order Response Times

   vii. OP-2 Calls Answered within Twenty Seconds – Interconnect Provisioning Center

   viii. MR-2 Calls Answered within Twenty Seconds – Interconnect Repair Center

   ix. GA-1 has two sub-measurements (GA-1A and GA-1D). PO-1 has two sub-measurements (PO-1A and PO-1B), which are aggregated together.

f. The specifics of how the state fund is to be controlled and used are provided in Section 7.5.

6. Low Volume, Developing Markets (Section 10)

a. If a CLEC has monthly volumes between ten and 100, Qwest will make special payments for a failure to meet certain sub-measurements for specified measures. Currently these are the ADSL qualified loop disaggregation for OP-3, OP-4, OP-5a, MR-3. MR-5. MR-7, and MR-8.

b. If, for aggregate CLEC volumes, Qwest fails to meet the standards (parity or benchmark), it will make a total payment according to the rules of Section 8 (using the High, Medium, and Low payment values). If the amount is less than $5,000, a $5,000 payment will be made. The amounts will be allocated to the CLECs based on each CLEC's relative share of the number of total service misses.

7. Payments (Section 11)

a. Tier 2 payments are made to the state's special fund one month after the due date for the performance measurement report, with interest charged for late payments.

b. Tier 1 payments to the CLECs will be made through bill credits.

c. The special fund will be in an interest-bearing account and will be used for PAP administrative expenses and oversight activities. Other uses and directions for the fund are specified. (Section 11.3)

8. Payment Caps (Section 12)

a. Qwest will not have to make payments exceeding the maximum cap of 36 percent of the state ARMIS Net Return in any given year, but this cap can be increased under certain circumstances.

9. Limitations (Section 13)

a. Qwest is not obligated to make payments if non-conformance resulted from
   i. A Force Majeure event (for benchmark measures)
   ii. Acts or omissions by a CLEC in violation of interconnection agreement obligations, law, or performed in bad faith
   iii. Unavoidable problems resulting from third-party systems or equipment

b. The burden is on Qwest to demonstrate that such limitations apply to specific cases

c. Various conditions are placed on a CLEC's acceptance of the PAP

d. Qwest may start a proceeding if payment to an individual CLEC exceeds $3 million in a month to demonstrate why the payment should not be required.

10. Reporting requirements (Section 14)

a. Monthly reports of CLEC-specific performance to each CLEC, subject to fines for late reporting

b. Monthly reports of aggregate CLEC performance to the Commission, subject to fines for late reporting, and can obtain CLEC-specific information through Commission order

c. Payment recalculations will be limited to the preceding three years.

11. Audits (Section 15)

a. Audits will be conducted on a 2-year cycle under the auspices of participating ROC commissions.

b. A ROC oversight committee will pick the independent auditor.

c. Expenses for such audits will be paid from the Tier-2 special fund.

d. CLECs and Qwest can also ask for an independent audit to settle disputes at the initiating parties' expense.

12. Reviews (Section 16)

a. Regular reviews occur every six months (Section 16.1). These include a review of:

    i. What performance measurements should be included

    ii. Whether benchmark standards should be modified or replaced by parity standards

    iii. Whether to change the High, Medium, and Low and the Tier 1 and Tier 2 categorization of the performance measurements.

    iv. The criterion for reclassification of a measurement will be whether the actual volume of data points was less or greater than anticipated.

b. Criteria for review of performance measurements will be:

    i. Whether there is an omission or failure to capture intended performance

    ii. Whether there is duplication of another measurement

    iii. No performance measurements may be added to the PAP unless they have subject to observation as diagnostic measurements for six months.

c. PID Administration Forum agreements can be implemented on Commission approval outside of the 6-month review (Section 16.1.1).

d. Any party may submit a root cause analysis to the Commission requesting removal of a PID or sub-measure from the PAP or requesting exemption of a PID or sub-measure from the application of the trigger mechanism for reinstatement or subsequent removal. In the analysis and recommendations concerning the root cause analysis, the Commission is to consider, at a minimum, whether the root cause analysis provides evidence of no harm, the same harm as covered by other PID measures, non-Qwest related causes, or other factors which directly relate to the harm or circumstances specific to the PID or sub-measure being analyzed. (Section 16.1.2)

e. Two years after Qwest's Section 271 approval, the Commission can participate in a joint independent third-party review of the effectiveness of the PAP. This review will not be for opening the PAP "generally for amendment, but would serve to assist Commissions in determining existing conditions and reporting to the FCC on the continuing adequacy of the PAP to serve its intended functions." The expense of the review will be paid by the Tier 2 special fund. (Section 16.2)

f. The PAP will be available through the CLEC interconnection agreements until Qwest eliminates its Section 272 affiliate. At that point, the Commission and Qwest will review whether the PAP is still necessary. (Section 16.3)

13. Other Provisions (Sections 17 and 18)

a. The PAP is a voluntary offer of Qwest (Section 17)

b. The SGAT, section 5.18, dispute resolution provisions will be used to settle disputes (Section 18)

14. Classification of Measures (Attachments 1 and 2)

a. Attachment 1 lists the Per Occurrence PIDs and indicates which measures are Tier 1, Tier 2, or both, and which are High, Medium, and Low. The footnotes include some important details in how the measures are treated within the PAP. In particular,

   i. Footnote a: only PO-3a-1, PO-3b-1, and PO-3c are used for measure PO-3 (however, PO-3 is currently subject to the Reinstatement/Removal Process).

   ii. Footnotes b and c define measure families; i.e.., measurements within a family share a single payment opportunity with only the measurements with the highest payments being paid. There are 7 such families: (1) PO-6a/PO-7a and (2) PO-6b/PO-7b (footnote – however, PO-7 is now subject to the Reinstatement/Removal Process); (3) OP-4a/OP-6-1, (4) OP-4b/OP-6-2, (5) OP-4c/OP-6-3, (6) OP-4d/OP-6-4, and (7) OP-4e/OP-6-5 (footnote c).

   iii. Footnote d: the One Allowable Miss Rule (Section 3.1.2) only applies to OP-5b if there is no more than one count in OP-5a.

   iv. Footnote e: OP-6a and OP-6b results are combined in PAP calculations resulting in 5 combined OP-6 results – (1) OP-6-1 (within MSA), (2) OP-

6-2 (outside MSA), (3) OP-6-3 (no dispatch), (4) OP-6-4 (Zone 1), and (5) OP-6-5 (Zone 2).

v. Footnote f: MR-6d and e only apply to xDSL-I capable loops.

vi. Footnote g: the following 18 product disaggregations are not included for payment calculations for OP-3, OP-4, OP-5a, OP-5b, OP-6, MR-3, MR-5, MR-6a, MR-6b, MR-6c, MR-7, and MR-8:

1. Resale Centrex
2. Resale Centrex 21
3. Resale DS0 (non-designed)
4. Resale DS0 (designed)
5. Resale DS0
6. E911/911 Trunks
7. Resale Frame Relay
8. Resale Basic ISDN (non-designed)
9. Resale Basic ISDN (designed)
10. Resale Basic ISDN
11. Resale Primary ISDN (non-designed)
12. Resale Primary ISDN (designed), Resale Primary ISDN
13. Resale PBX (non-designed)
14. Resale PBX (designed),
15. Resale PBX, Sub-Loop Unbundling
16. UNE-P (POTS)
17. UNE-P (Centrex)
18. UNE-P (Centrex 21).

b. Attachment 2 lists the performance measurements subject to a per measurement cap. These measures are:

i. Time to Provide Recorded Usage Records – BI-1 (Tier 1/Tier 2)

ii. Billing Accuracy – Adjustments for Errors – BI-3 (Tier 1)

iii. Billing Completeness – BI-4 (Tier 1/Tier 2)

C. Differences

1. General

The PAPs for the participating states can be put into two main categories.

a. The Colorado PAP (CPAP)

b. The PAPs for the other states (QPAPs).

Prior to the latest version of the CPAP, measures were categorized as Tier 1A, Tier 1B, Tier 1C, and Tier 2. Tier 1A, 1B and 1C roughly correspond to the Tier 1 High, Medium, and Low categories in the QPAPs. However, the categorization depends not only on the measure but also on the product disaggregation. In addition, while Tier 1B, Tier 1C, and Tier 2 use the same basic tests as the QPAP to determine conformance, Tier 1A takes a somewhat different approach. In the latest CPAP version, Tier 1B, Tier 1C, and Tier 2 have been eliminated.

There two basic existing versions of the QPAPs:

a. 2004 version without the 2007 Stipulation recommended provisions: Montana and Utah for all CLECs except those parties to the Stipulation.

b. 2007 version including all are most of the 2007 Stipulation recommendations: Arizona, Idaho, Iowa, Nebraska, New Mexico, North Dakota, South Dakota, and Wyoming. This is also the version used in Utah for those CLECs who were party to the Stipulation

2. Performance Measurements (Section 3)

PID Reinstatement/Removal Process

As described above, Section 3 contains measures are listed that "are not subject to the payment mechanisms of the PAP; however, they are subject to the PID Reinstatement/Removal Process."

The following table shows additional measures contained in certain states:

Measure Number	Measure Name	State(s)
PO-2B	Electronic Flow-through	NM
OP-7	Coordinated "Hot Cut" Interval – Unbundled Loop	CO
CP-3	Collocation Feasibility Study Interval	AZ, CO

The latest version of the Colorado PAP contains only the following measures in this section: OP-7, OP-17A, NI-1, NP-1A, and CP-3.

The original CPAP list was as follows:

- GA-3 Gateway Availability EB-TA
- GA-4 System Availability EXACT
- GA-7 Timely Outage Resolution Following Software Releases
- PO-2B Electronic Flow-through[4]
- PO-3 LSR Rejection Notice Interval
- PO-5D Firm Order Confirmations (FOCs) On Time (ASRs for LIS Trunks)
- PO-7 Filling Completion Notification Timeliness
- PO-8 Jeopardy Notice Interval
- PO-16 Timely Release Notifications

[4] PO-2B is evaluated on a quarterly basis and thus reinstatement is based on two consecutive quarters rather than three consecutive months.

- PO-19 Stand-Alone Test Environment (SATE) Accuracy
- OP-7 Coordinated "Hot Cut" Interval – Unbundled Loop
- OP-17 Timeliness of Disconnects Associated with LNP Orders
- MR-11 LNP Trouble Reports Cleared within25 Hours
- BI-4 Billing Completeness
- NI-1 Trunk Blocking
- NP-1 NXX Code Activation
- CP-3 Collocation Feasibility Study Interval
- QX-1 Timely and Complete Notifications of Product/Process Change.[5]

There is no Reinstatement/Removal process for the following PAPs: Montana, and Utah, except for the parties to the 2007 Stipulation.

3. Statistical Tests (Sections 4 and 5)

Section 5 of the PAPs contains a table with the critical z-value based on the CLEC volume (sample size).

In all states except Arizona and Colorado, the following table and note are shown:

TIER-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-5a, 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.

The Arizona PAP has a similar table and note, but the critical z-value remains 2.0 for any CLEC volume greater than 300.

The Colorado PAP does not contain the column on "LIS Trunks, UDITs, Resale, UBL-DS1 and DS-3". For these products the different z-value of 1.04 for a CLEC value of 1-10 is not shown. The Colorado PAP also does not contain the note.

[5] QX-1 is not a PID measurement but is defined specifically for the CPAP.

4. Tier 1 Payments (Section 6)

Tier 1 Payments to CLEC

The PAPs contains tables that show the Tier 1 payments to CLECs based on High, Medium, and Low severity and the escalating payments per month.

The standard table is as follows:

TIER 1 PAYMENTS TO CLEC

Per Occurrence							
Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Each following month after Month 6 add
High	$150	$250	$500	$600	$700	$800	$100
Medium	$ 75	$150	$300	$400	$500	$600	$100
Low	$ 25	$ 50	$100	$200	$300	$400	$100
Per Measurement Cap							
Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Each following month after Month 6 add
High	$25,000	$50,000	$75,000	$100,000	$125,000	$150,000	$25,000
Medium	$10,000	$20,000	$30,000	$ 40,000	$ 50,000	$ 60,000	$10,000
Low	$ 5,000	$10,000	$15,000	$ 20,000	$ 25,000	$ 30,000	$ 5,000

Arizona has a cap at 6 months and the penalties do not increase by the last column shown above for both Per Occurrence and Per Measurement failures.

Colorado has a Per Occurrence of $225 (instead of $150) in Month 1 for Tier 1A (High).

And, although Wyoming does have the table shown above, its PAP also states that "BI-1, BI-3B, and BI-4 billing measurements shall be subject to a maximum per measurement cap of $30,000 for a single CLEC per month."

Tier 1 Payments for BI-3A

The PAPs contain tables that show the payments liable to the CLECs for BI-3A.

The standard table is as follows:

TIER 1 PAYMENTS TO CLECS FOR BI-3A

Total Bill Adjustment Amount	**Per Occurrence Amount**	**Cap**
$0 - $0.99	$0	$0
$1 - $199.99	$1	$200
$200 - $999.99	$10	$5,000
$1,000 - $9,999.99	$10	$10,000
$10,000 - $49,999.99	$15	$15,000

$50,000 - $99,999.99	$20	$20,000
$100,000 and over	$25	$25,000

However, the PAPs for Montana and Utah do not contain the table above.

Tier 1 Payments for Collocation

The PAPs generally contain tables that show the payments liable to the CLECs for the Collocation measures CP-2 and CP-4. The standard table is as follows:

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

The Arizona and Colorado PAPs do not contain the above table. In Arizona CP-1 (Collocation Installation Interval) and CP-3 (Feasibility Study Interval) are included in the PAP along with CP-2 and CP-4, and all four measures are listed in Attachment 1 as Per Occurrence measures: CP-1 (Tier 1 Low), CP-2 (Tier 1 High, Tier 2 High), CP-3 (Tier 1 Low), and CP-4 (Tier 1 Low). The CPAP has special rules related to the processes measured in all four Collocation measures shown in CPAP Appendices A and B.

5. Tier 2 Payments (Section 7)

The PAPs contains tables that show the Tier 2 payments based on High, Medium, and Low severity and the escalating payments per month.

The standard tables are as follows:

TIER 2 PAYMENTS TO STATE FUNDS

Per Occurrence

Measurement Group	
High	$500
Medium	$300
Low	$200

Per Measurement Cap

Measurement Group	
High	$75,000
Medium	$30,000
Low	$20,000

Instead of the set amount shown in the tables above, Arizona has an escalating Per Occurrence and Per Measurement Cap. The Arizona Tier 2 payment schedule follows. The Month 3 schedules match the tables above.

ARIZONA TIER-2 PAYMENTS

Per Occurrence

Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6 & each following month
High	$0	$0	$500	$600	$700	$800
Medium	$0	$0	$300	$400	$500	$600
Low	$0	$0	$200	$300	$400	$500

Per Measurement Cap

Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6 & each following month
High	$0	$0	$75,000	$100,000	$125,000	$150,000
Medium	$0	$0	$30,000	$ 40,000	$50,000	$ 60,000
Low	$0	$0	$20,000	$ 30,000	$30,000	$ 40,000

Nebraska also has an escalating Per Occurrence and Per Measurement Cap. The Nebraska Tier 2 payment schedule follows. Again, the Month 3 schedules match the standard tables. Unlike in Arizona, the Tier 2 payments begin with the 1st failure month. The maximum cap is set at the Month 6 Per Occurrence or Per Measurement amount as in Arizona.

NEBRASKA TIER-2 PAYMENTS

Per Occurrence

Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
High	$150	$250	$500	$600	$700	$800
Medium	$ 75	$150	$300	$400	$500	$600
Low	$ 25	$ 50	$200	$300	$400	$500

Per Measurement Cap

Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
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	$20,000	$ 25,000	$ 30,000	$ 35,000

Prior to the latest version of the CPAP, when Tier 2 was still active, Colorado did not have similar tables as those shown above. The Tier 2 measures in Colorado were calculated on a variety of Per Measurement amounts based on performance, shown in Appendix A of the CPAP. The Per Occurrence measures had been eliminated from the CPAP in 2006.

6. Step by Step Calculation of Monthly Tier 2 Payments to State Funds (Section 9)

The states have a variety of methods of determining whether non-conformance for Tier 2 measures results in payments. Generally, this involves whether the performance has been sub-standard for a certain period of time.

The table below details each state's approach to determining whether a Tier 2 measurement is a candidate in the current month for a Tier 2 payment based on non-conformance. As noted above, the Colorado PAP no longer contains Tier 2 measures, but in prior versions the candidacy was based on non-conformance in any month.

State	Rules for Tier 2 Payment Candidacy
Arizona	Only 3 consecutive months: Rolling basis
Utah	Any month
Idaho	Tier 2 measurements with Tier 1 counterparts: 3 consecutive months OR 2 out of 3 months for the 12 month period AND an additional 2 consecutive months in the current month. Tier 2 measurements without Tier 1 counterparts: Any month
Iowa	2 out of 3 consecutive months for the 12 months period AND the current month
Montana, Nebraska, New Mexico South Dakota, and Wyoming	Tier 2 measurements with Tier 1 counterparts: 3 consecutive months OR 2 out of 3 months for the 12 month period AND an additional 2 consecutive months in the current month. Tier 2 measurements without Tier 1 counterparts: 3 consecutive months OR 2 out of 3 consecutive months for the 12 months period AND the current month
North Dakota	Tier 2 measurements with Tier 1 counterparts: 2 out of 3 for the 12 month period AND the current month (3rd month in any 12 month period) Tier 2 measurements without Tier 1 counterparts: 1 out of 12 month period AND current month (second month during any 12 month period)

7. Colorado Tier 1A

The CPAP specifies special calculations for Tier 1A ("High") Parity measures that do not exist in the other states:

> *…the average performance Qwest gives CLC in the current month shall be compared to the average of prior six months retail performance, subject to a variance factor (standard performance).*

Only in Colorado is the retail performance averaged over the prior six months in order to conduct a parity comparison for Tier 1A ("High") measures.

Also, in an attempt to "minimize the impact of smaller sample sizes on the ultimate calculation", the variance factor modifies the calculated standard based on CLEC volume, measure, and product. Only Colorado has a variance factor that modifies the standard for Tier 1A ("High") measures.

8. Other Provisions

There are a number of detailed differences among the PAPs regarding payment methods, payment caps, limitations, reporting requirements, use of Tier 2 funds, and audits.

In the review section (QPAP Section 16 and CPAP Section 18), there are also a number of detailed differences. However, the principal differences are:

- In Arizona, there are no provisions for a two-year review or a review when Qwest eliminates its Section 272 affiliate.
- In Colorado, there are no provisions for a two-year review or a review when Qwest eliminates its section 272 affiliate. However, Colorado has provisions for a three-year review. In addition, after six years the Tier 1B, Tier 1C, and Tier 2 sub-measures are automatically removed from the CPAP. However, after five and one-half years, there will be a review with the objective of phasing-out the CPAP entirely. This review will focus on ensuring that phase-out of the CPAP is indeed appropriate at that time, and on identifying any sub-measures in addition to the Tier 1A sub-measures that should continue as part of the CPAP.
- In Montana, there are no provisions for parties to submit a root cause analysis to the Commission requesting removal of a PID or sub-measure from the PAP or requesting exemption of a PID or sub-measure from the application of the trigger mechanism for reinstatement or subsequent removal.
- In New Mexico, there are no provisions for the review after Qwest eliminates its Section 272 affiliate. Instead, like Colorado, sub-measures are automatically eliminated from the PAP after six years. The ones to remain are listed in Attachment 3. Like Colorado, New Mexico calls for a review with the objective of phasing-out the PAP after five and one-half years to ensure that any sub-measures not listed in Attachment 3 should continue in the PAP.
- In South Dakota, the review when Qwest eliminates its Section 272 affiliate begins after Qwest petitions to eliminate the PAP.

9. Tier 1 and Tier 2 Measurements (Attachments/Appendices)[6]

a. Attachment 1 / Appendix A

Measures

Attachment 1 of Exhibit K contains the list of measures that are eligible for Tier 1 and/or Tier 2 payments along with whether they have High, Medium, or Low penalties.

Idaho, Iowa, Montana, Nebraska, North Dakota, South Dakota, Utah, and Wyoming have the same list of measures and the same High, Medium, and Low assessments in this Attachment.

Arizona includes an additional four measures, PO-19, CP-1, CP-2, CP-3, and CP-4 along with their High, Medium, and Low assessments. Additionally, Arizona has a High Tier 2 assessment for measures OP-3, OP-4, OP-5a and b, OP-6, MR-7, and MR-8 while the states listed above have a Medium Tier 2 assessment for these measures.

New Mexico includes an additional two measures, PO-2b and PO-19a along with their High, Medium, and Low assessments.

The CPAP for Colorado has the most differences for the measures eligible for Tier 1A payments. As indicated previously, the Colorado PAP now only contains Tier 1A (High) measures. Colorado also includes OP-7A as a Tier 1A measure. Also, in the CPAP disaggregations and products for PO-5 and PO-9 are included as Tier 1 (High) while in other states they are Low.

Note Differences on Families

Notes are included in Appendix A of the CPAP and Attachment 1 of the QPAPs.

There are differences in the families of measures with payment opportunities.

For PO-6 and PO-7, all of the QPAPs have the same footnote:

> *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.*

The CPAP, however, does not indicate this family relationship since PO-6 and PO-7 are not Tier 1A measures.

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[6] The QPAPs have attachments, usually Attachment 1 and Attachment 2. The CPAP has Appendix A and Appendix B, which provides similar information.

For OP-4 and OP-6, all of the QPAPs have the same footnote:

> *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.*

The CPAP has the equivalent condition but with somewhat different language:

> *Submeasures for OP-4 are included with OP-6 as "families" OP-4A with (OP-6A-1 & OP-6B-1 combined); OP-4B with (OP-6A-2 & OP-6B-2 combined); OP-4C with (OP-6A-3 & OP-6B-3 combined); OP-4D with (OP-6A-4 & OP-6B-4 combined); and OP-4E with (OP-6A-5 & OP-6B-5 combined). Submeasures within each family share a single payment opportunity with only the submeasure (OP-4 or OP-6A & OP-6B combined) with the highest payment being paid.*

For OP-6, all of the QPAPs have the same footnote:

> *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).*

However, the CPAP does not have any such combination rule for OP-6.

The Arizona PAP extends the family concept to the OP-3 measure while no other states do:
OP-3 is included as three "families:" OP-3a/3b, OP-3c, and OP-3d/e. Measurements within each family share a single payment opportunity with only the measurement with the highest payment being paid.

Product Disaggregation Exclusion Differences

In all states except Colorado, Montana, and Utah there is a note indicating the product disaggregations that are excluded from measures OP-3, OP-4, OP-5 (A,B), OP-6, MR-3, MR-5, MR-6 (A,B,C), MR-7, and MR-8.

The products listed are:
Resale Centrex, Resale Centrex 21, Resale DS0 (non-designed), Resale DS0 (designed), Resale DS0, E911/911 Trunks, Resale Frame Relay, Resale Basic ISDN (non-designed), Resale Basic ISDN (designed), Resale Basic ISDN, Resale Primary ISDN (non-designed), Resale Primary ISDN (designed), Resale Primary ISDN, Resale PBX (non-designed), Resale PBX (designed), Resale PBX, Sub-Loop Unbundling, UNE-P (POTS), UNE-P (Centrex), and UNE-P (Centrex 21).

In Colorado, the PAP does not include any of the above products for this list of measures, except for Sub-Loop Unbundling which is applicable for OP-3A, OP-3B, OP-4A, OP-4B, OP-6A-1, OP-6B-1, OP-6A-2, and OP-6B-2.

Additionally, in all states except Arizona and Colorado, MR-6D and MR-6E have a note that they are "Applicable only to xDSL-I capable loops." For these measures in Arizona, they are "Applicable only to EELs-DS1 level and xDSL-I capable loops." The Colorado PAP does not contain this note and products for MR-6D and MR-6E include LIS Trunks, Unbundled Analog Loops, Unbundled Non-loaded Loops (2-wire), Unbundled Non-loaded Loops (4-wire), Unbundled DS1-Capable Loops, Unbundled xDSL-I Capable Loops, Unbundled ISDN-Capable Loops, Unbundled Loops of DS3 and Higher, and Enhanced Extended Loops (DS1 Level).

b. Attachment 2

Attachment 2 of Exhibit K lists the Performance Measurements Subject to Per Measurement Caps. These include BI-1, BI-3, and BI-4. The Wyoming PAP includes a note that "BI-1, BI-3B and BI-4 shall be subject to a maximum per measurement cap of $30,000 for a single CLEC per month." The Colorado PAP does not include an Attachment 2 and has an overall payment (not based on per measurement caps).

c. Attachment 3

Among the participating states,[7] only New Mexico has an Attachment 3, which lists the Performance Measurements Subject to Continuation Beyond Six-Year Review.

d. Appendix B

Only Colorado has an Appendix B which provides "any modifications to the definitions, formulas, or standards, or other aspects of the business rules set forth in the PIDs in Exhibit B, as well as the definitions and business rules for any measurements, that apply uniquely to the CPAP."

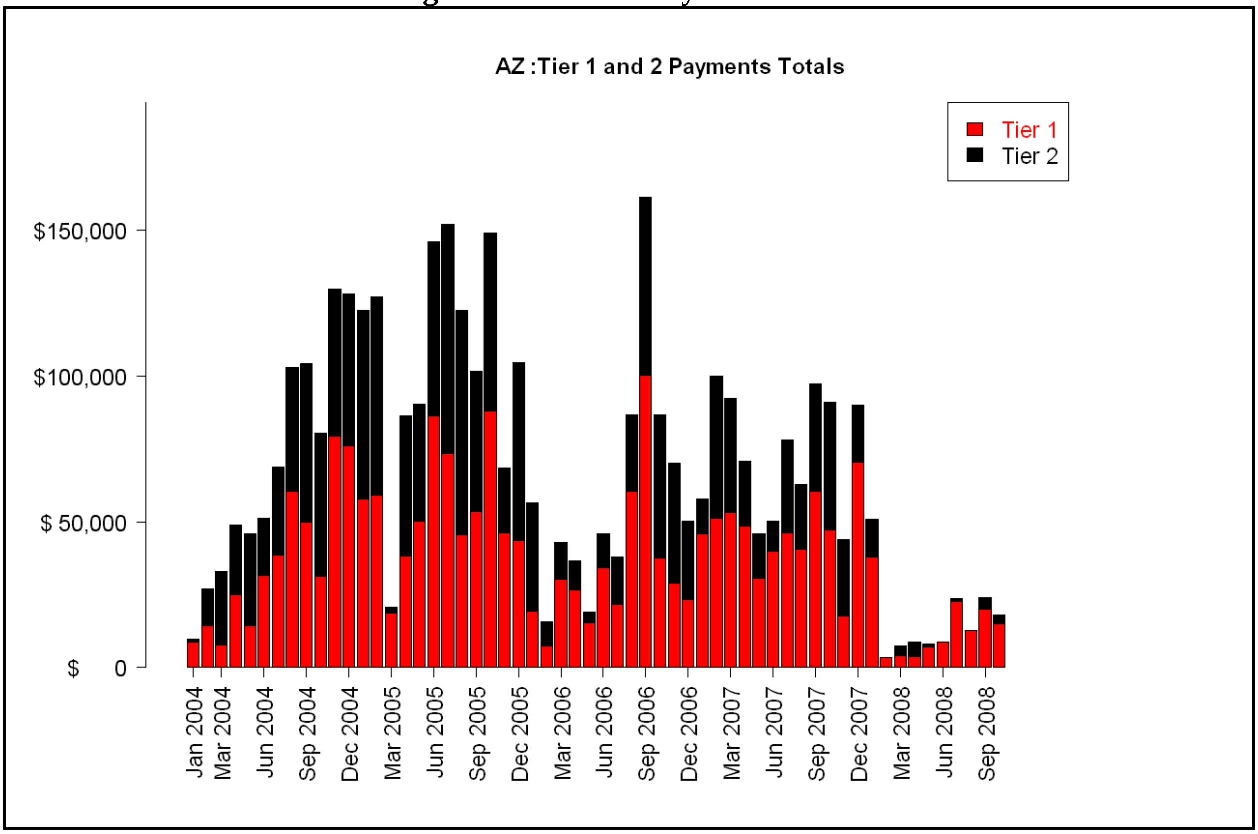
[7] The Washington PAP has a similar Attachment 3.

Appendix B: State-Specific Analysis

A. Arizona

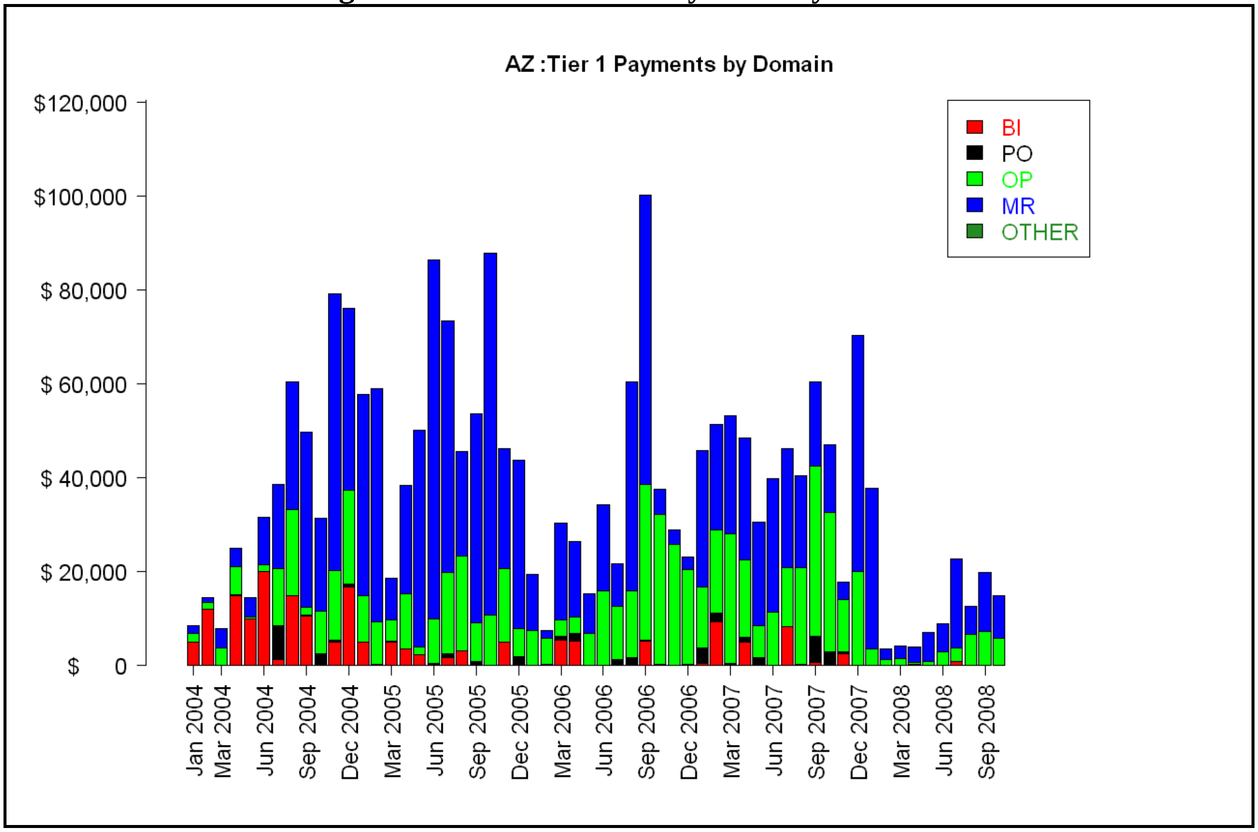
Arizona's Tier 1 and Tier 2 payments followed the pattern found in most states in that payment amounts were erratic, but slowly dropped over time, especially in 2008. In late 2004 and early 2005, payments were in excess of $100,000 in many months. Since early 2008, payments have averaged less than $30,000 per month. The figure below shows total payments in Arizona, with Tier 1 and Tier 2 in red and black, respectively. Tier 2 payments fell more than Tier 1 payments over time, partly because Tier 2 payments only begin at the third month of non-conforming service whereas Tier 1 payments begin in the first month of non-conformance. Occasional failures, resulting in Tier 1 payments, continued to occur through 2008, but consistent failures (three or more months in a row) all but ended by that time.

Figure 1: Arizona Payment Totals



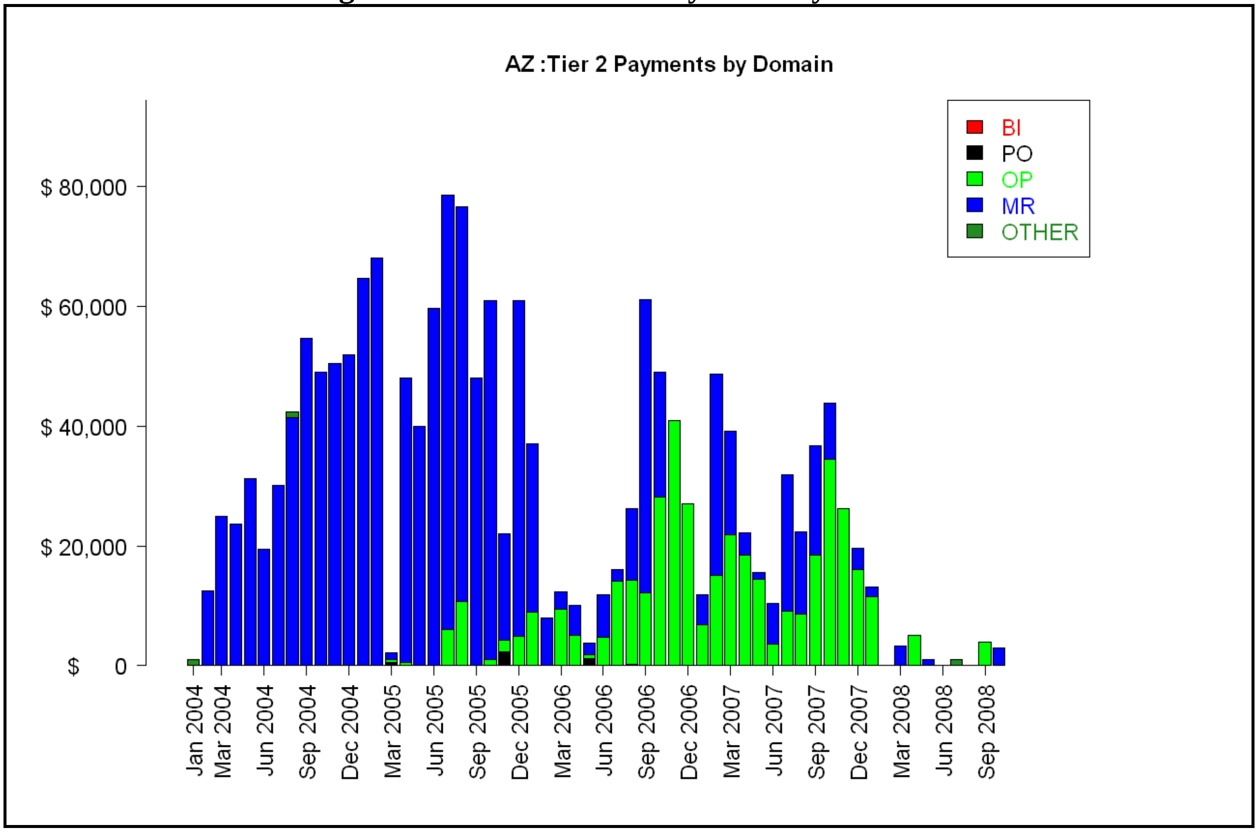
The next figure shows Arizona Tier 1 payments by domain. While payments related to Billing dominated in the early part of the Study Period, payments related to Provisioning and Maintenance & Repair quickly grew, so that by late 2004, most payments were related to OP and MR measures. After December 2004, OP and MR payments typically accounted for 80 to 90 percent of total Tier 1 payments.

Figure 2: Arizona Tier 1 Payments by Domain



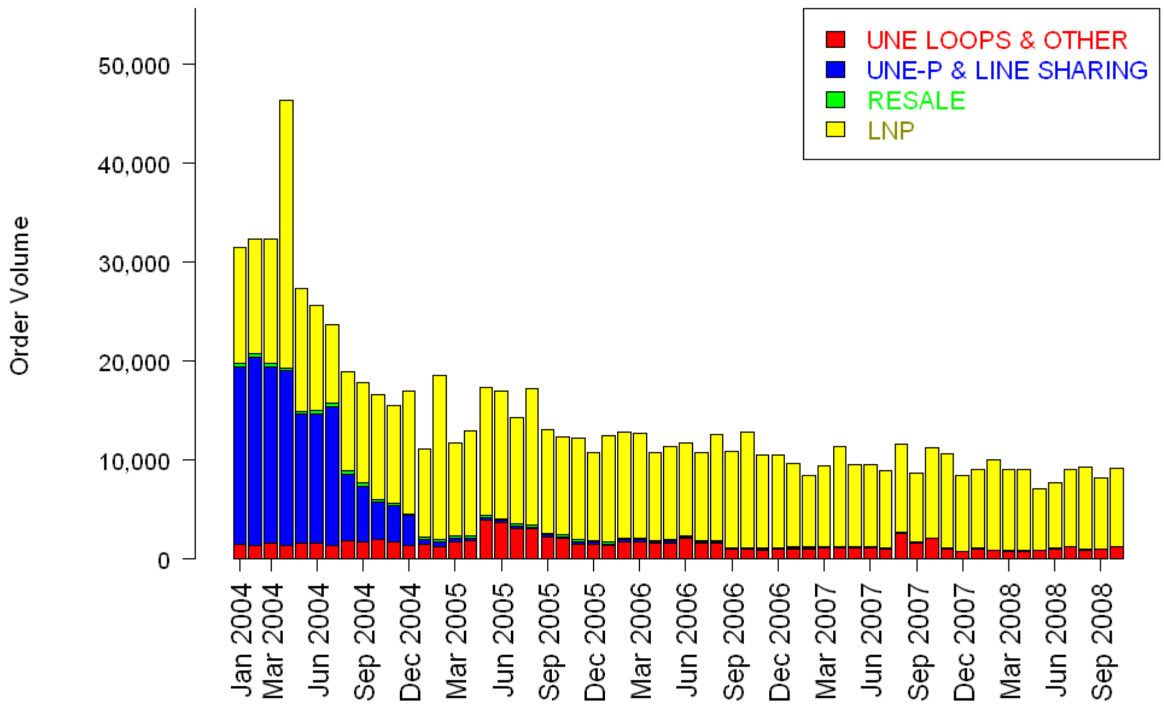
Tier 2 payments for Arizona were dominated by MR measures until early 2006, when OP measures became responsible for most of Tier 2 payments. Prior to 2006, Tier 2 payments for Arizona frequently totaled more than $40,000; in 2008, however, Tier 2 payments were usually far less than $20,000 per month. The figure below details Tier 2 payments for Arizona by domain.

Figure 3: Arizona Tier 2 Payments by Domain



Arizona's overall monthly order volumes have declined significantly over the course of the Study Period as shown in Figure 4. These losses were driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the 1996 Telecommunications Act. Volume for both LNP and UNE Loop orders have also declined somewhat during this timeframe. Resale order volumes in Arizona were never very significant. LNP orders are by far the currently dominant ordering type.

Figure 4: Arizona Ordering Volumes



As shown on Figure 5, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Arizona also experienced declining volumes of Resale lines during the Study Period. UNE Loops and lines provided through other services have held relatively constant throughout this period.

Figure 5: Arizona Lines in Service

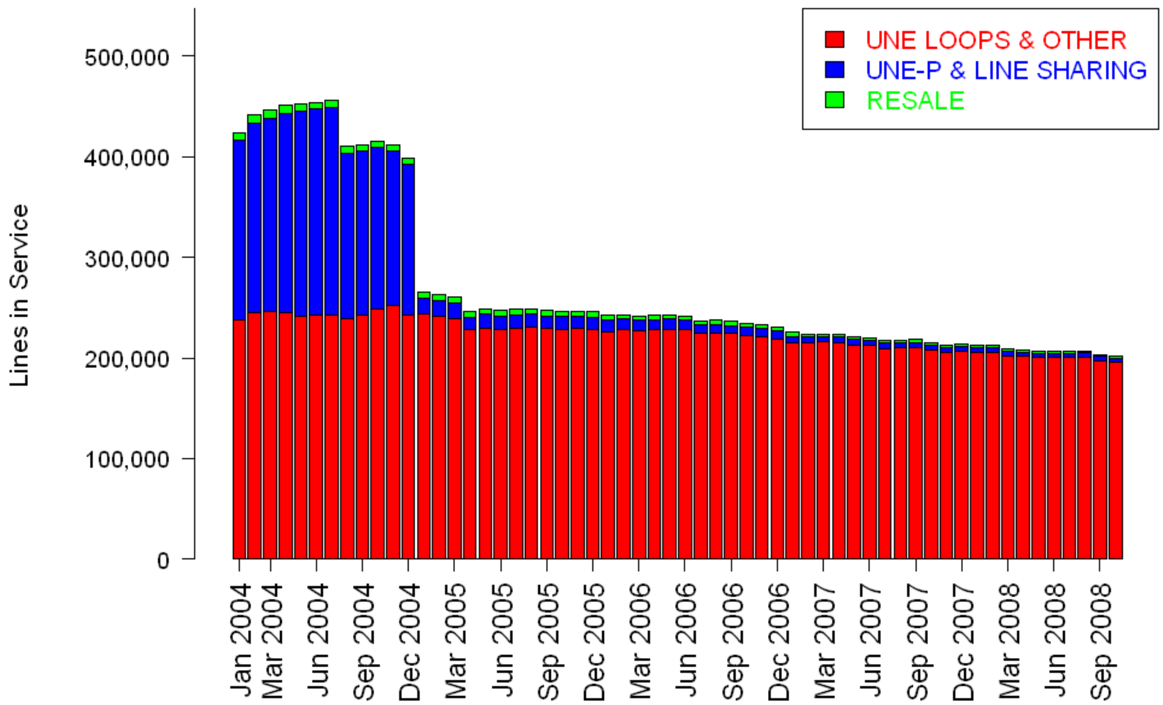


Table 1 shows the monthly CLEC aggregate order volumes for Arizona from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. Orders for Loops with Condition exceeded ten transactions per month only in July 2008. All the other products had very low order volumes.

Table 1
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Arizona

Date	UBL-DS3 Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	3	4	0
Feb 2007	0	1	0	3	4	0
Mar 2007	0	3	0	9	2	0
Apr 2007	0	3	0	8	2	0
May 2007	0	2	0	7	3	0
June 2007	0	2	0	10	6	0
July 2007	0	3	0	7	3	0
Aug 2007	0	1	0	4	2	0
Sep 2007	0	2	0	6	3	0
Oct 2007	0	1	0	4	4	0
Nov 2007	0	0	0	1	3	0
Dec 2007	0	2	0	2	2	0
Jan 2008	0	4	0	5	0	0
Feb 2008	0	2	0	2	2	0
Mar 2008	0	1	0	2	0	0
Apr 2008	0	0	0	3	4	0
May 2008	0	0	0	10	0	0
June 2008	0	0	0	3	1	0
July 2008	0	0	0	15	1	0
Aug 2008	0	0	0	4	1	0
Sep 2008	0	0	0	3	0	0
Oct 2008	0	0	0	3	0	0

Table 2 shows the monthly trouble report volumes in Arizona for the four products (UBL-DS3 Loop, UDIT-Above DS1, UBL 4-Wire Non-Loaded Loop and Line Sharing) that Liberty recommends for removal from the MR measures in the PAP. Also shown are the volumes for the UBL-ISDN Capable Loop product. Liberty believes that the trouble report volumes for this product are sufficiently high that it should remain as a product disaggregation for MR measures in Arizona. Liberty also notes that this product disaggregation in the MR measures produced $24,937 in Tier 1 and $66,800 in Tier 2 penalty payments in Arizona from January 2007 through October 2008.

Table 2
Trouble Report Volumes for Selected Products
January 2007 through October 2008
Arizona

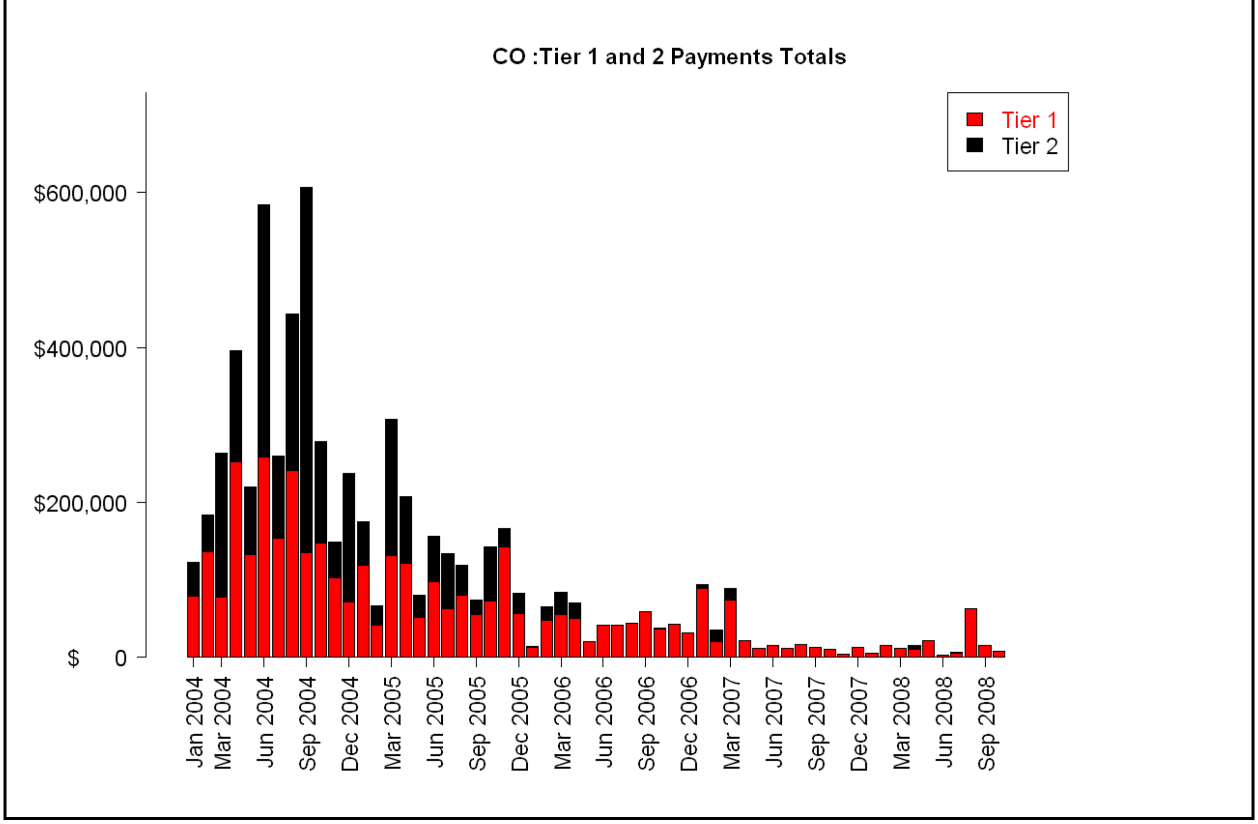
Date	UBL DS3	UDIT–Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	35	5
Feb 2007	0	1	0	31	3
Mar 2007	0	0	0	34	6
Apr 2007	0	0	0	28	3
May 2007	0	1	0	27	3
June 2007	0	2	0	24	1
July 2007	0	3	0	59	3
Aug 2007	0	2	0	52	3
Sep 2007	0	4	0	39	1
Oct 2007	0	3	0	29	4
Nov 2007	0	1	0	20	2
Dec 2007	0	1	0	23	3
Jan 2008	0	2	0	27	1
Feb 2008	0	0	0	17	3
Mar 2008	0	3	0	25	0
Apr 2008	0	1	0	11	0
May 2008	0	0	0	16	0
June 2008	0	1	0	18	1
July 2008	0	1	0	21	3
Aug 2008	0	0	0	23	5
Sep 2008	0	1	0	25	2
Oct 2008	0	2	0	24	5

B. Colorado

Colorado's Tier 1 and Tier 2 payments were frequently above $200,000 per month in 2004. Until April 2006, Tier 2 payments were a significant portion of total payments and frequently the majority. However, as discussed in the report, changes instituted in the CPAP in 2006 caused Tier 2 payment to all but disappear after April 2006.

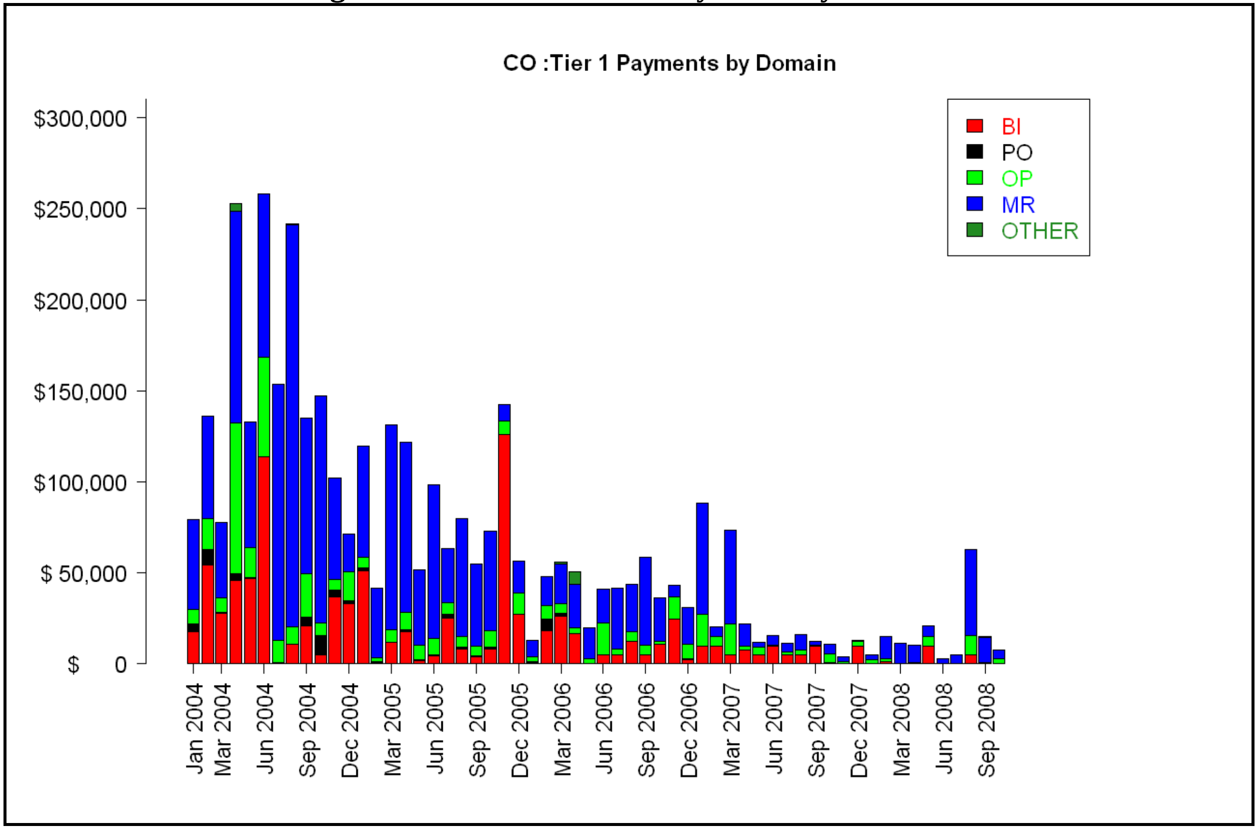
The figure below shows CPAP payments during the Study Period, by month. By the middle of 2006, payments rarely exceeded $50,000 per month. Payments in 2008 were the lowest of any year and exceeded $25,000 once, in August.

Figure 6: Colorado Payment Totals



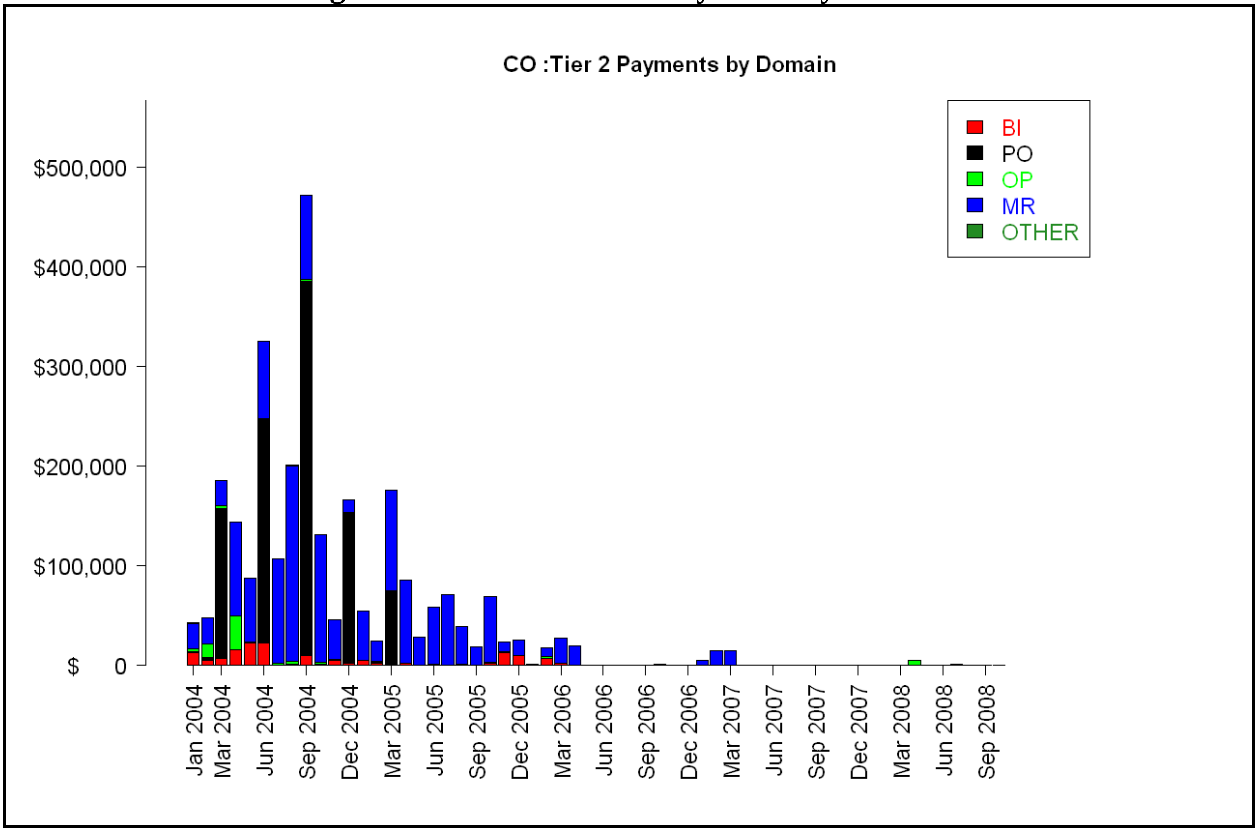
The next figure shows Colorado Tier 1 payments by domain. Payments related to Billing and Maintenance & Repair (BI and MR) dominated throughout the Study Period, while OP payments were occasionally substantial.

Figure 7: Colorado Tier 1 Payments by Domain



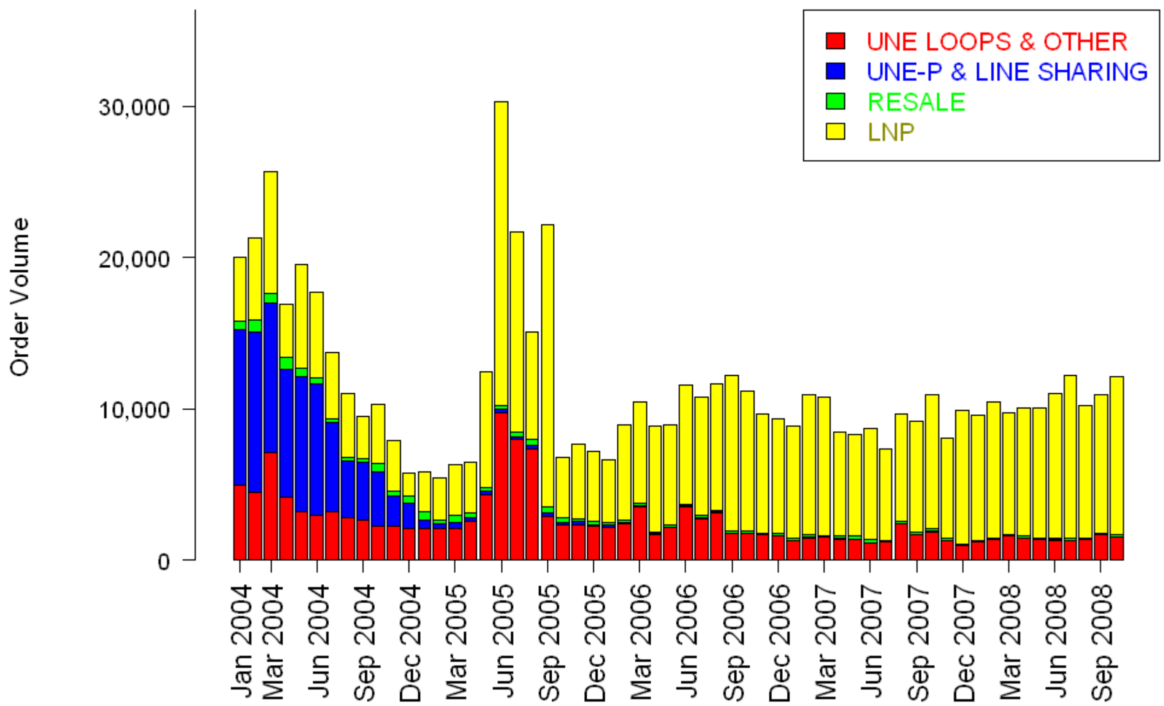
Tier 2 payments for Colorado were dominated by PO and MR measures until early 2006, when Tier 2 payments virtually ended, due to the structural CPAP change described in the report. The figure below details Tier 2 payments for Colorado by domain.

Figure 8: Colorado Tier 2 Payments by Domain



Colorado's overall monthly order volumes have declined significantly over the course of the Study Period as shown in Figure 9. These losses were driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the 1996 Telecommunications Act. Colorado experienced a significant increase in the order volumes for UNE Loops in the middle of 2005, but since then UNE Loop order volumes have declined. Resale order volumes have also declined, but these orders have never been a significant component of orders in Colorado. LNP order grew significantly in 2005 and then declined. Since the middle of 2006, the LNP volumes have been fairly constant.

Figure 9: Colorado Ordering Volumes



As shown on Figure 10, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Colorado also experienced declining volumes of Resale lines during the Study Period. UNE Loops and lines provided through other services have held relatively constant throughout this period.

Figure 10: Colorado Lines in Service

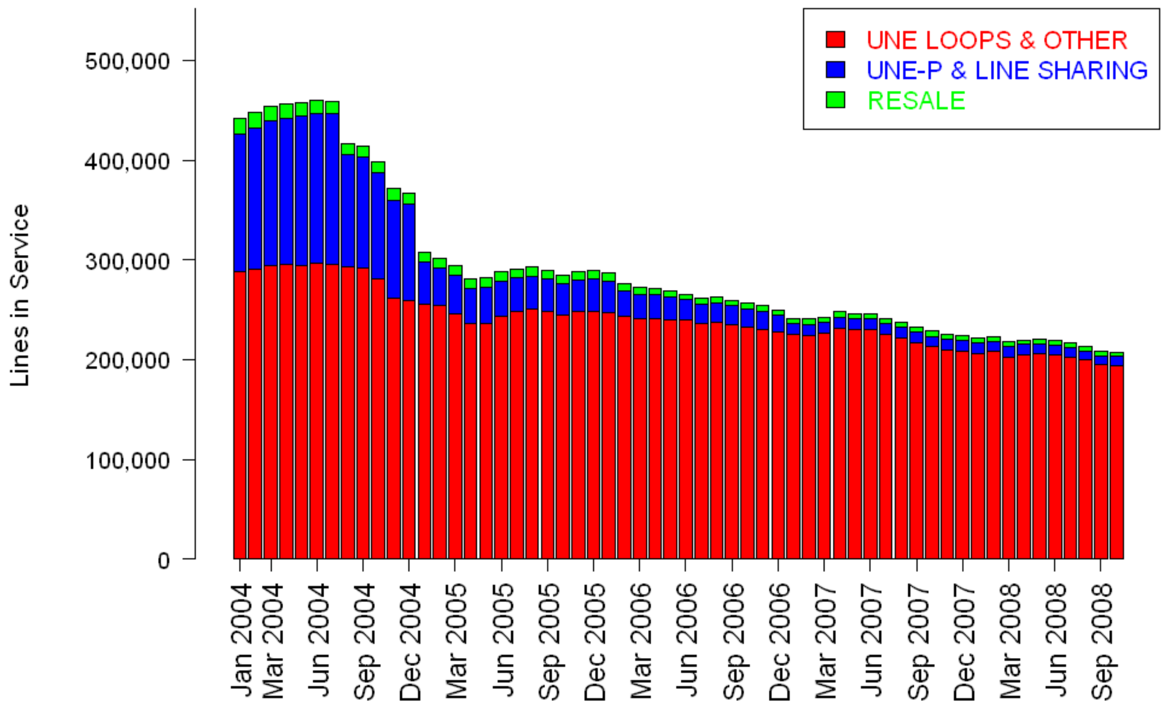


Table 3 shows the monthly CLEC aggregate order volumes for Colorado from January 2007 through October 2008 for the five products Liberty recommends for removal from the OP measures in the CPAP. Line Sharing was removed from the CPAP in 2006. However, Liberty reexamined the volumes for this product in Colorado, and confirmed the appropriateness of removing this product. The table shows that Line Sharing order volumes exceeded ten transactions per month in only three months during this period. These months were early in 2007, with significant reduction in volumes since July 2007, presumably because of the TRO/TRRO phase-out mechanism.

Table 3
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Colorado

Date	UBL-DS3 Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	4	2	10
Feb 2007	0	5	0	0	3	40
Mar 2007	0	1	0	2	5	7
Apr 2007	1	7	0	4	3	36
May 2007	0	5	0	4	3	9
June 2007	0	1	0	4	1	20
July 2007	0	1	0	6	4	1
Aug 2007	0	3	0	3	0	1
Sep 2007	0	4	0	1	1	0
Oct 2007	0	2	0	1	0	3
Nov 2007	0	1	0	2	0	3
Dec 2007	0	0	0	5	0	1
Jan 2008	1	1	0	0	0	3
Feb 2008	0	3	0	5	1	1
Mar 2008	0	0	0	1	3	3
Apr 2008	0	1	0	2	1	0
May 2008	0	0	0	1	3	1
June 2008	0	1	0	0	2	2
July 2008	0	2	0	4	5	1
Aug 2008	0	2	0	4	5	1
Sep 2008	1	4	0	1	1	1
Oct 2008	0	4	0	2	1	1

Table 4 shows the monthly trouble report volumes in Colorado for the three products (UBL-DS3 Loop, UDIT-Above DS1, and UBL 4-Wire Non-Loaded Loop) that Liberty recommends for removal from the MR measures in the CPAP. Also shown on the table are the Colorado volumes for Line Sharing and the UBL-ISDN Capable Loops. Liberty believes that the trouble report volumes for UBL-ISDN Capable Loops are sufficiently high that it should remain as a product disaggregation for MR measures in Colorado. Liberty also notes that this product disaggregation in the MR measures produced $34,132 in Tier 1 penalty payments in Colorado.

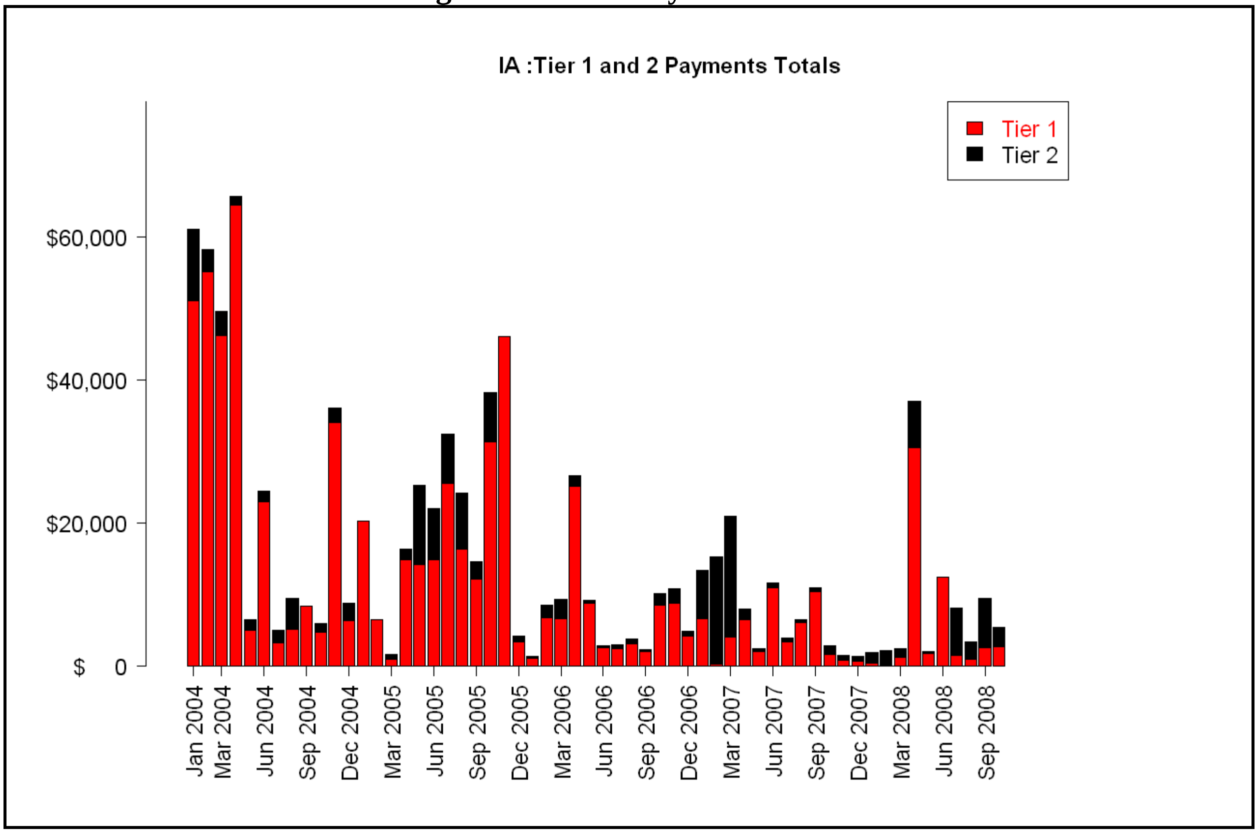
Table 4
Trouble Report Volumes for Selected Products
January 2007 through October 2008
Colorado

Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	1	0	39	6
Feb 2007	0	1	0	14	5
Mar 2007	0	3	0	22	8
Apr 2007	1	1	0	21	2
May 2007	0	2	0	15	6
June 2007	0	3	0	20	7
July 2007	0	1	0	18	7
Aug 2007	0	4	0	31	1
Sep 2007	0	5	0	14	3
Oct 2007	0	2	0	16	7
Nov 2007	0	3	0	16	4
Dec 2007	0	3	0	11	0
Jan 2008	1	2	0	16	4
Feb 2008	0	2	0	16	2
Mar 2008	0	3	0	14	6
Apr 2008	0	2	0	10	1
May 2008	0	3	0	13	4
June 2008	0	2	0	10	2
July 2008	0	4	0	14	3
Aug 2008	0	3	0	14	8
Sep 2008	1	4	0	6	4
Oct 2008	0	3	0	3	4

C. Iowa

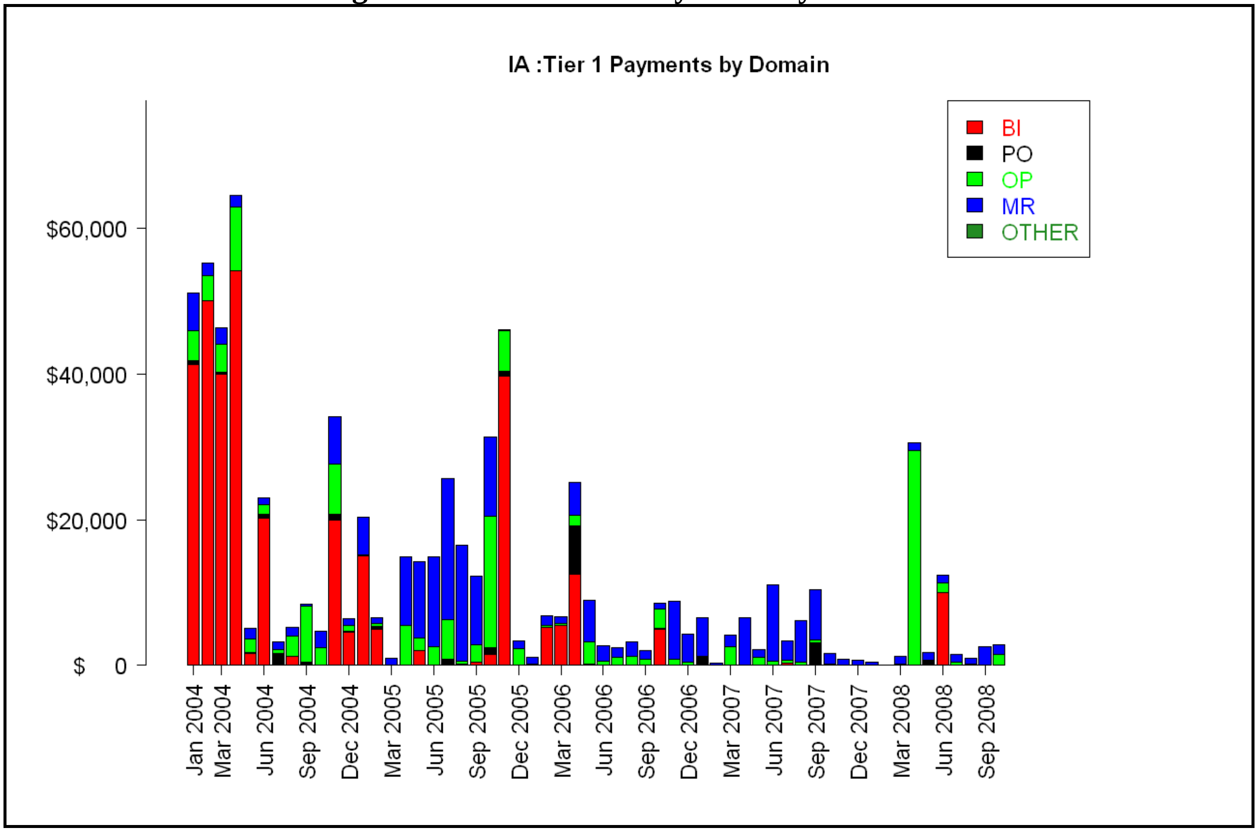
Iowa's Tier 1 and Tier 2 payments followed the pattern found in most states in that payment amounts were erratic, but slowly dropped over time, especially in 2008. In late 2004 and early 2005, payments were in excess of $20,000 for many months. Since early 2008, payments have averaged less than $20,000 per month. The figure below shows total payments in Iowa, with Tier 1 and Tier 2 shown in red and black, respectively. Occasional failures, resulting in Tier 1 payments, continued to occur through 2008.

Figure 11: Iowa Payment Totals



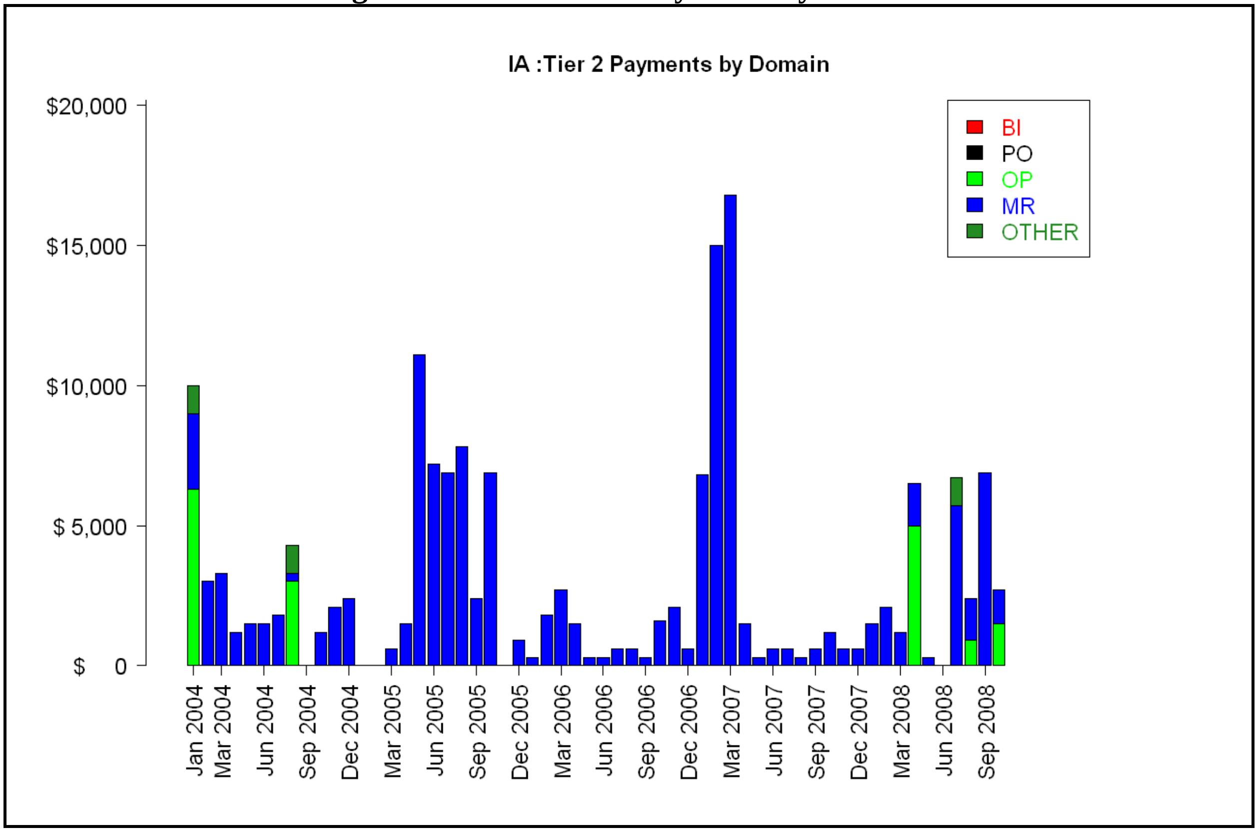
The next figure shows Iowa Tier 1 payments by domain. While payments related to Billing dominated in the early part of the Study Period, payments related to Provisioning and Maintenance & Repair quickly grew, so that by late 2004, most payments were related to OP and MR measures. After December 2004, OP and MR payments typically accounted for 80 percent of total Tier 1 payments, but occasionally Billing accounted for significant payments, even in the later years.

Figure 12: Iowa Tier 1 Payments by Domain



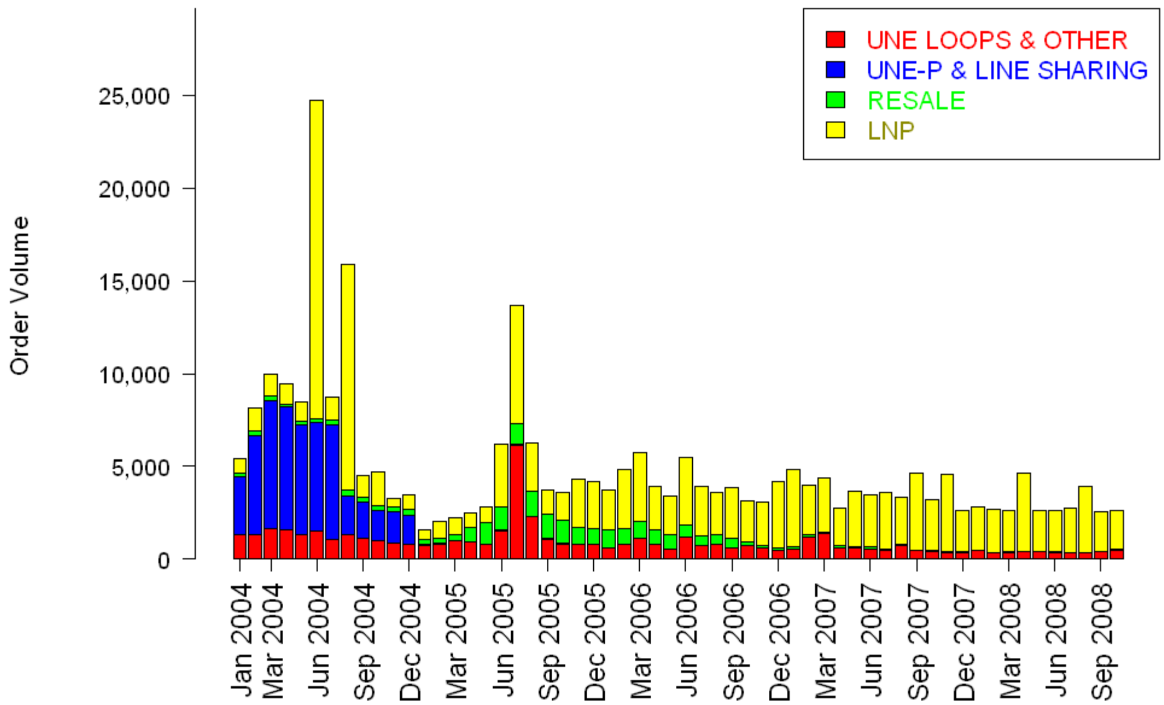
Tier 2 payments for Iowa were dominated by MR measures, with OP measures occasionally responsible for a significant percentage of payments. Overall Tier 2 payments have rarely been above $10,000 in recent months. The figure below details Tier 2 payments for Iowa by domain.

Figure 13: Iowa Tier 2 Payments by Domain



Iowa's overall monthly order volumes have declined significantly over the course of the Study Period as shown in Figure 14. These losses were driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the 1996 Telecommunications Act. Iowa experienced a brief increase in the order volumes for UNE Loops in 2005 and for Resale in 2005 and 2006. Since that time, order volumes have dropped off significantly for Resale, and UNE Loop volumes have been fairly constant. LNP orders have remained fairly constant since 2005.

Figure 14: Iowa Ordering Volumes



As shown on Figure 15, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Iowa also experienced declining volumes of Resale lines during the Study Period. UNE Loops and lines provided through other services have also declined during this period, but more slowly.

Figure 15: Iowa Lines in Service

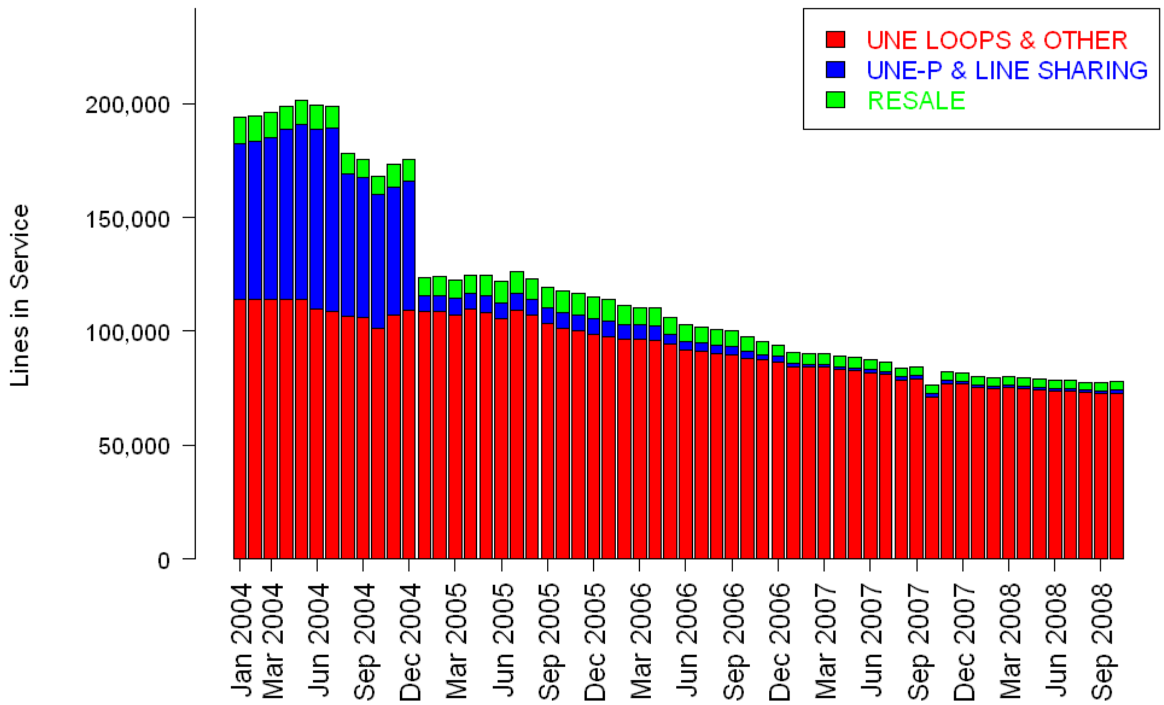


Table 5 shows the monthly CLEC aggregate order volumes for Iowa from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. Orders for Loops with Conditioning exceeded ten transactions per month only twice. The volumes in the other months were very low. Order volumes for all the other products were generally very small.

Table 5
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Iowa

Date	UBL-DS3 Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	1	0	0	10	0
Feb 2007	0	2	0	0	5	0
Mar 2007	0	2	1	0	10	0
Apr 2007	0	0	0	4	5	0
May 2007	0	2	0	1	10	0
June 2007	0	0	0	1	6	0
July 2007	0	1	0	0	4	0
Aug 2007	0	1	0	0	3	0
Sep 2007	0	0	0	0	2	0
Oct 2007	0	0	0	2	6	0
Nov 2007	0	0	0	1	4	0
Dec 2007	0	0	0	0	2	0
Jan 2008	0	0	0	1	4	0
Feb 2008	0	0	0	0	3	0
Mar 2008	0	0	0	0	3	0
Apr 2008	0	0	0	0	1	0
May 2008	0	0	0	18	3	0
June 2008	0	0	0	0	1	0
July 2008	0	0	0	0	2	0
Aug 2008	0	0	0	0	2	0
Sep 2008	0	0	0	12	10	0
Oct 2008	0	1	0	0	5	0

Table 6 shows the monthly trouble report volumes in Iowa for the five products that Liberty recommends for removal from the MR measures in the PAP. None of the products had more than eight troubles in a month at the CLEC aggregate level.

Table 6
Trouble Report Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Iowa

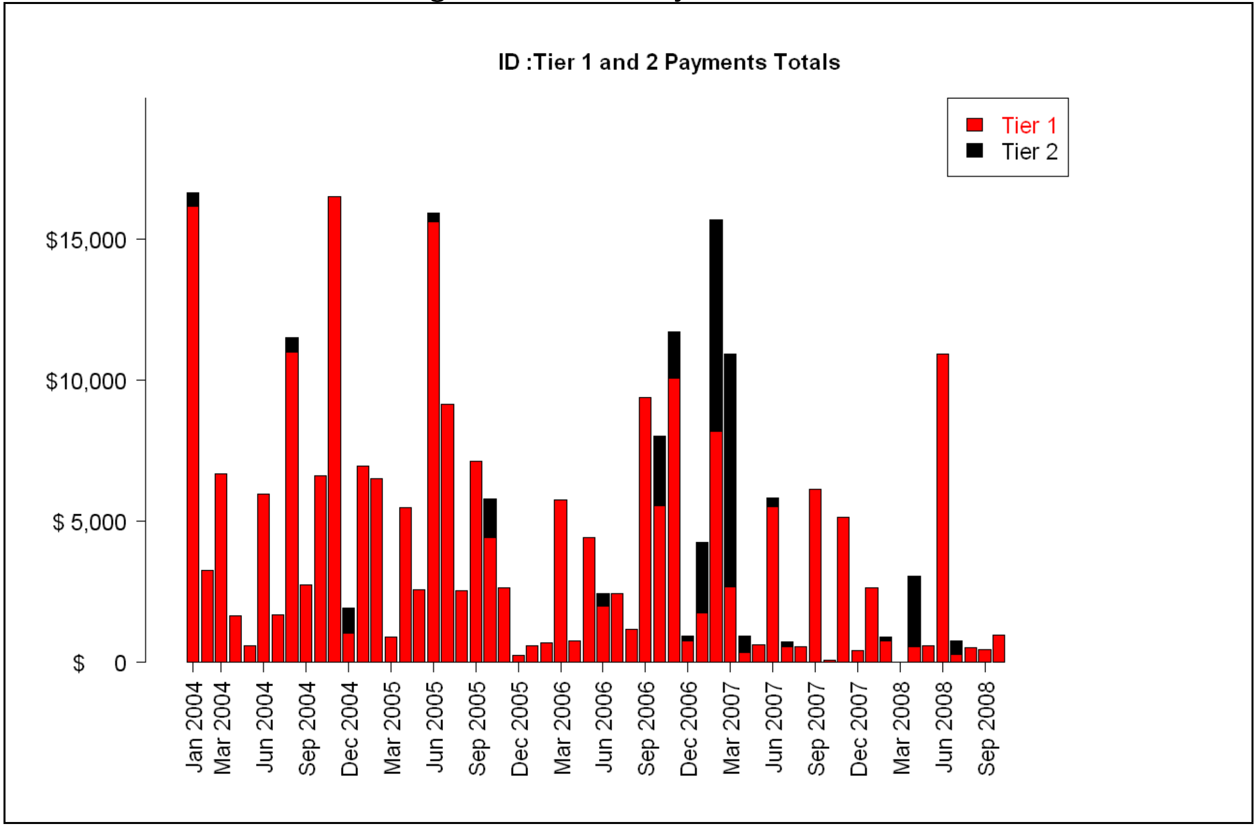
Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	1	0	7	0

Feb 2007	0	0	0	1	0
Mar 2007	0	1	0	6	0
Apr 2007	0	2	0	6	0
May 2007	0	1	0	3	0
June 2007	0	0	0	8	0
July 2007	0	1	0	5	0
Aug 2007	0	0	0	7	0
Sep 2007	0	0	0	5	0
Oct 2007	0	0	0	3	0
Nov 2007	0	0	0	1	0
Dec 2007	0	0	0	4	0
Jan 2008	0	0	0	7	0
Feb 2008	0	0	0	5	0
Mar 2008	0	0	0	4	0
Apr 2008	0	0	0	6	1
May 2008	0	0	0	2	0
June 2008	0	0	0	6	1
July 2008	0	0	0	5	0
Aug 2008	0	1	0	7	0
Sep 2008	0	0	0	8	0
Oct 2008	0	0	0	2	0

D. Idaho

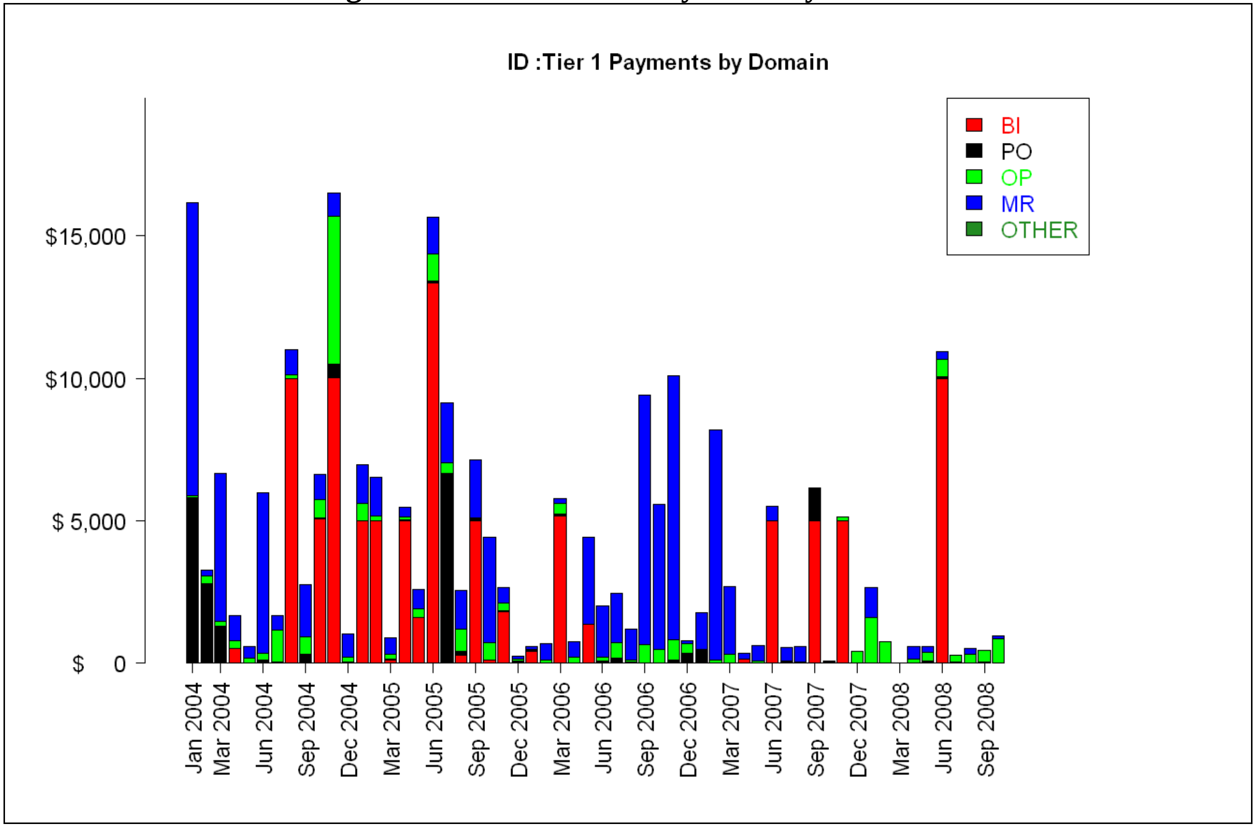
Idaho's Tier 1 and Tier 2 payments followed the pattern found in most states in that payment amounts were erratic, but slowly dropped over time. In late 2004 and early 2005, payments were in excess of $5,000 in many months. Since early 2008, payments have averaged less than $5,000 per month. The figure below shows total payments in Idaho, with Tier 1 and Tier 2 shown in red and black, respectively. Occasional failures, resulting in Tier 1 payments, continued to occur through 2008, but few Tier 2 payments occurred after March 2007.

Figure 16: Idaho Payment Totals



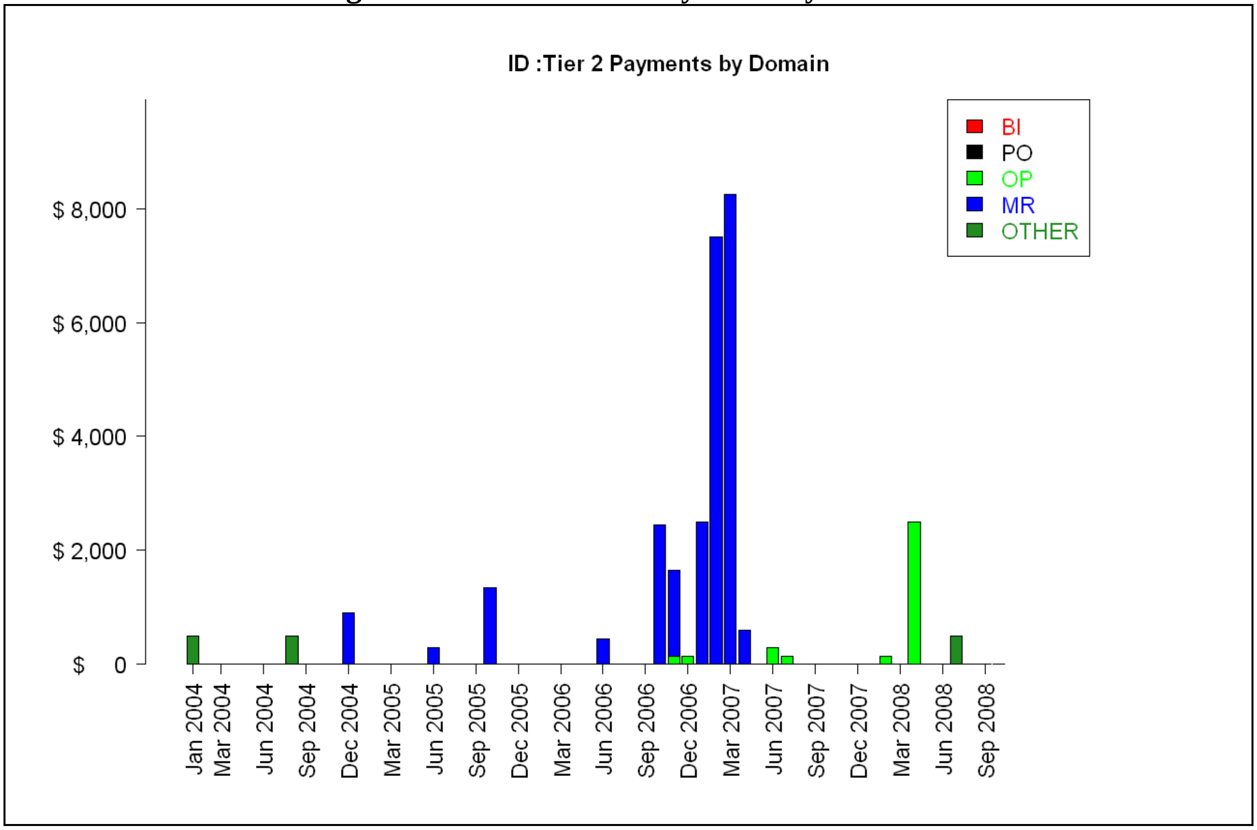
The next figure shows Idaho Tier 1 payments by domain. Payments related to Billing are substantial throughout the Study Period, as are payments related to Maintenance & Repair. In the early part of the Study Period, significant payments were made related to PO measures (pre-ordering functions).

Figure 17: Idaho Tier 1 Payments by Domain



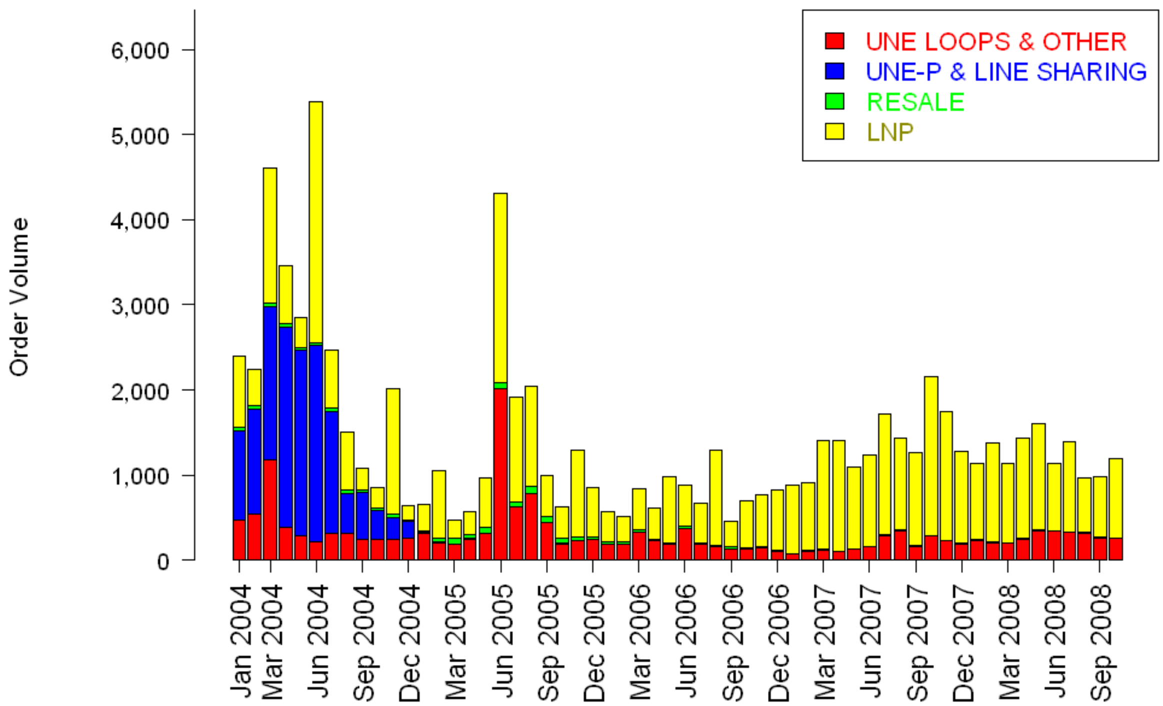
Tier 2 payments for Idaho were dominated by MR measures, with OP measures occasionally responsible for a significant percentage of payments. Overall Tier 2 payments have rarely been above $4,000. The figure below details Tier 2 payments for Idaho by domain.

Figure 18: Idaho Tier 2 Payments by Domain



Idaho's overall monthly order volumes have shown peaks and valleys over the course of the Study Period as shown in Figure 19. A large decrease in order volumes from 2004 to 2005 was driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the Telecommunications Act. Idaho experienced a large increase in the ordering volumes for UNE Loops in mid-2005. Since then, UNE Loop volumes have remained fairly constant with some minor month-over-month variability. Resale volumes were never very significant in Idaho. LNP orders have remained fairly constant since 2006.

Figure 19: Idaho Ordering Volumes



As shown on Figure 20, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Idaho also experienced declining volumes of Resale lines during the Study Period. UNE Loops and lines provided through other services have remained fairly constant.

Figure 20: Idaho Lines in Service

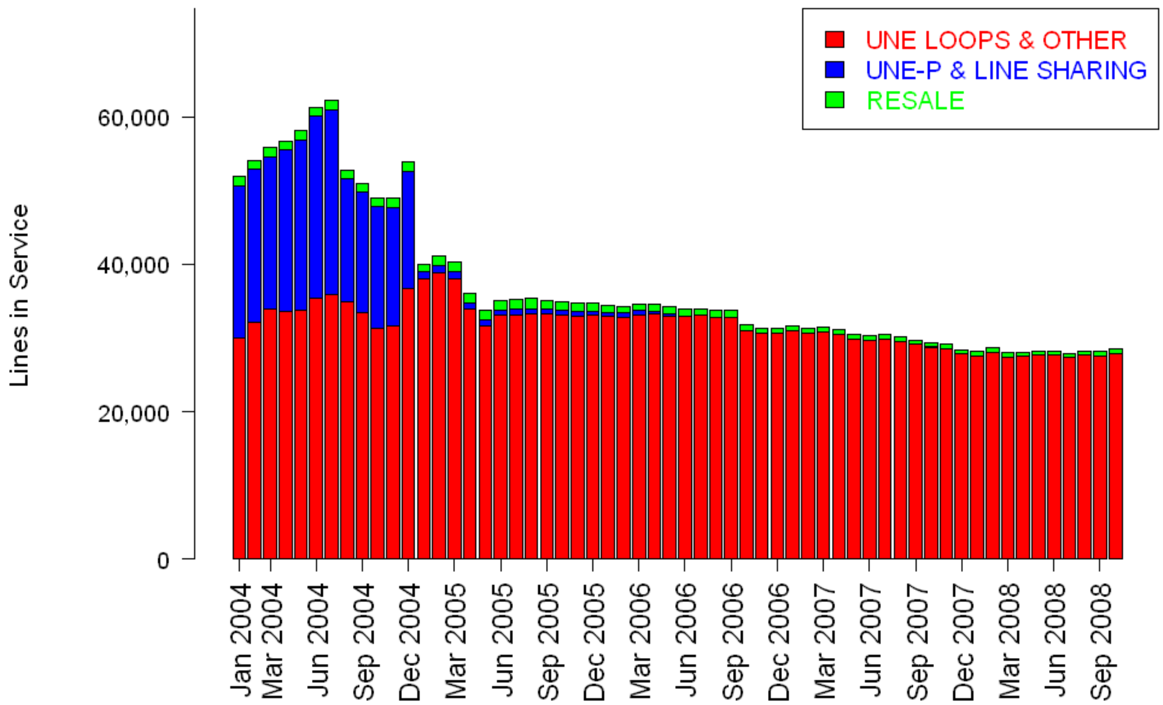


Table 7 shows the monthly CLEC aggregate order volumes for Idaho from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. Orders for Loops with Condition exceeded ten transactions per month only in April 2008. The CLEC aggregate monthly volumes for the other months were extremely low. Order volumes for all the other products were also very small.

Table 7
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Idaho

Date	UBL-DS3 Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	0	4	0
Feb 2007	0	0	0	0	1	0
Mar 2007	0	0	0	0	3	0
Apr 2007	0	1	0	0	5	0
May 2007	0	0	0	0	2	0
June 2007	0	0	0	3	1	0
July 2007	0	0	0	0	0	0
Aug 2007	0	0	0	1	3	0
Sep 2007	0	0	0	0	1	0
Oct 2007	0	0	0	0	0	0
Nov 2007	0	0	0	1	0	0
Dec 2007	0	0	0	0	0	0
Jan 2008	0	0	0	1	1	0
Feb 2008	0	1	0	3	2	0
Mar 2008	0	5	0	0	2	0
Apr 2008	0	0	0	11	1	0
May 2008	0	2	0	0	1	0
June 2008	0	0	0	0	0	0
July 2008	0	0	0	0	0	0
Aug 2008	0	0	0	0	0	0
Sep 2008	0	0	0	0	0	0
Oct 2008	0	1	0	1	1	0

Table 8 shows the monthly trouble report volumes in Idaho for the five products that Liberty recommends for removal from the MR measures in the PAP. As the table shows, the number of trouble reports was extremely low for all products. It was usually zero and never exceeded four per month.

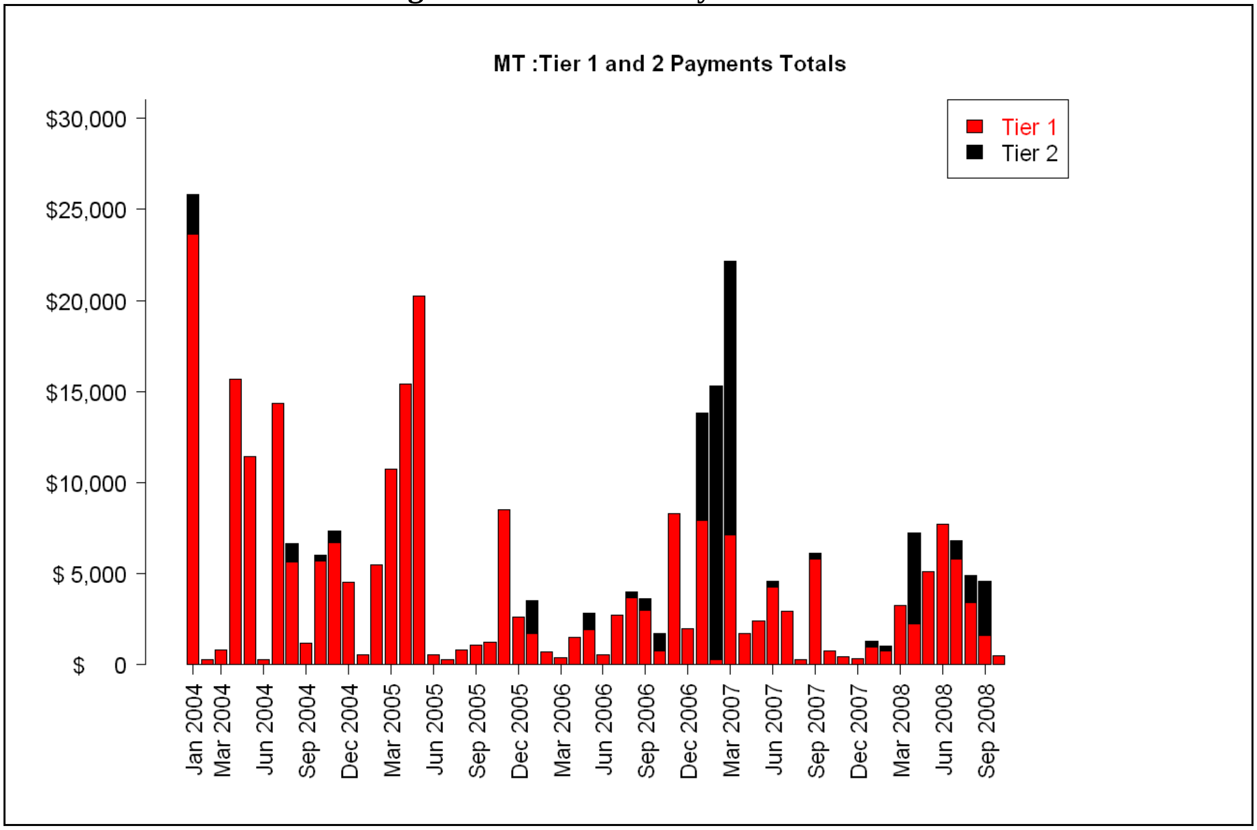
Table 8
Trouble Report Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Idaho

Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	3	0
Feb 2007	0	0	0	1	0
Mar 2007	0	0	0	1	0
Apr 2007	0	0	0	1	0
May 2007	0	0	0	4	0
June 2007	0	0	0	4	0
July 2007	0	0	0	0	0
Aug 2007	0	0	0	1	0
Sep 2007	0	0	0	1	0
Oct 2007	0	0	0	0	0
Nov 2007	0	0	0	1	0
Dec 2007	0	0	0	2	0
Jan 2008	0	0	0	0	0
Feb 2008	0	0	0	0	0
Mar 2008	0	1	0	0	0
Apr 2008	0	2	0	3	0
May 2008	0	0	0	1	0
June 2008	0	0	0	1	0
July 2008	0	0	0	0	0
Aug 2008	0	0	0	0	0
Sep 2008	0	0	0	3	0
Oct 2008	0	0	0	0	0

E. Montana

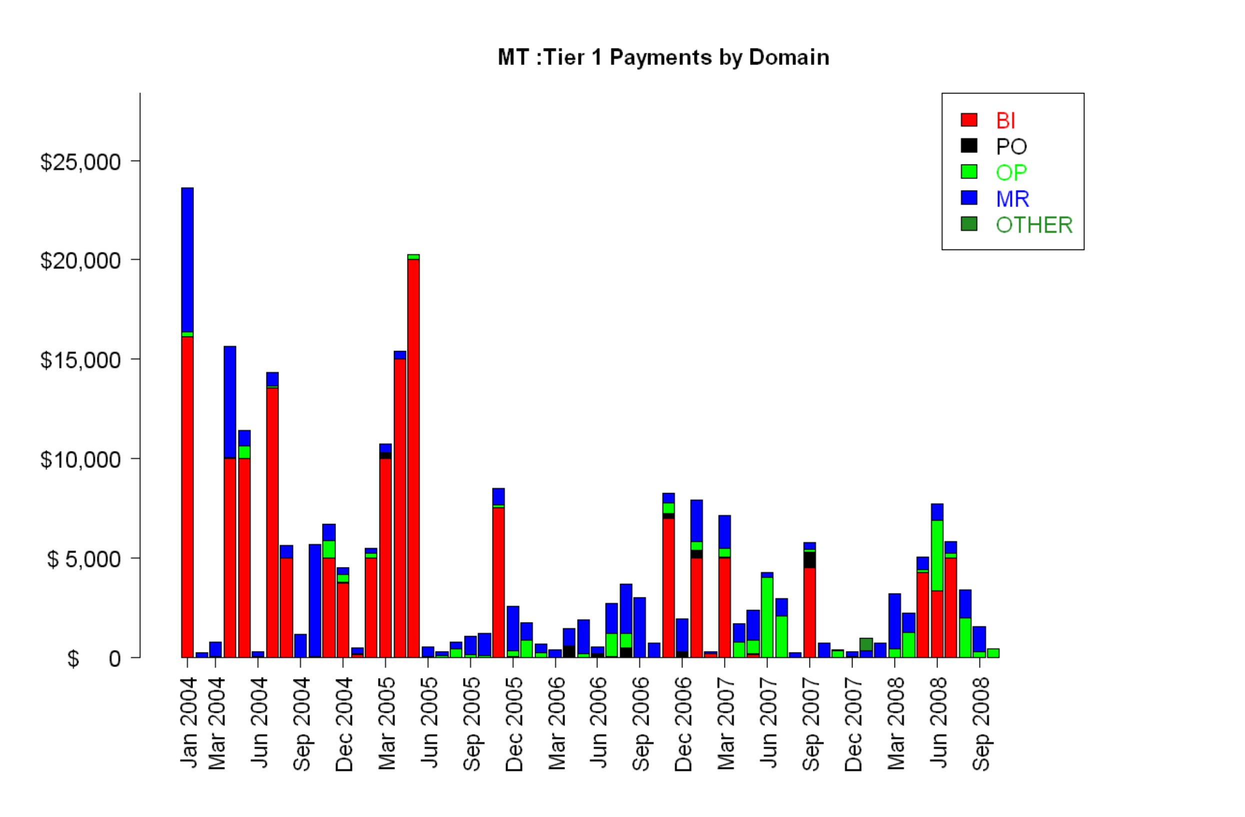
Montana's Tier 1 and Tier 2 payments followed the pattern found in most states in that payment amounts were erratic, but slowly dropped over time. In late 2004 and early 2005, payments were in excess of $10,000 in many months. Since early 2008, payments have averaged about $6,000 per month. The figure below shows total payments in Montana, with Tier 1 and Tier 2 shown in red and black, respectively.

Figure 21: Montana Payment Totals



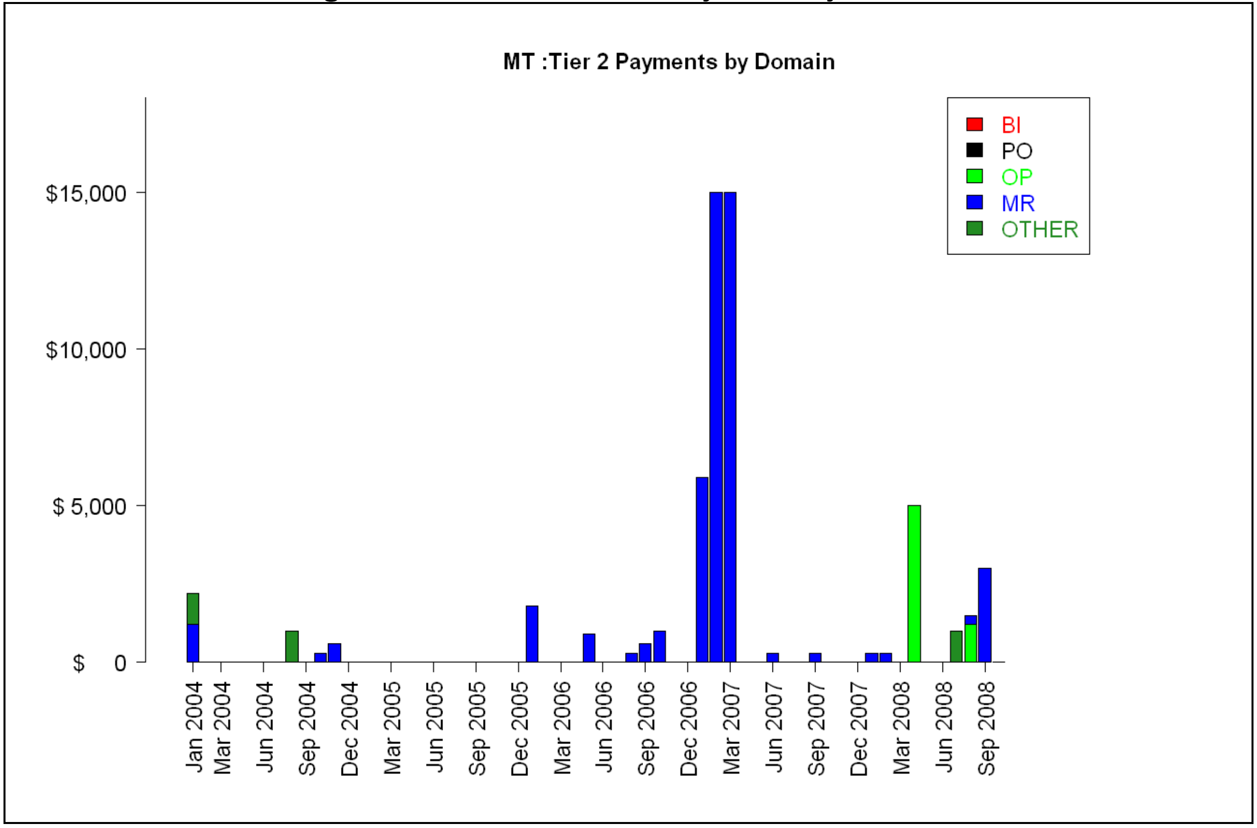
The next figure shows Montana Tier 1 payments by domain. Payments related to Billing are substantial throughout the Study Period, and payments related to Maintenance & Repair and Provisioning grew more significant in 2007 and 2008.

Figure 22: Montana Tier 1 Payments by Domain



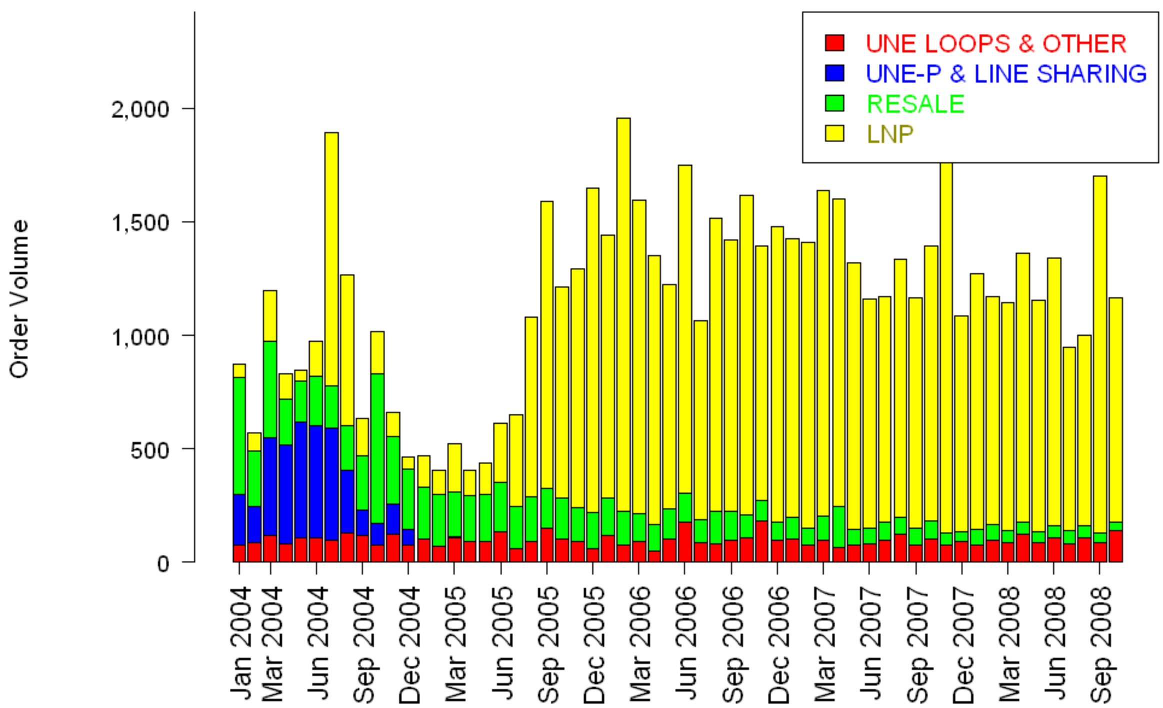
Tier 2 payments for Montana were dominated by MR measures, with OP measures responsible for a significant percentage of payments in two months in 2008. Overall Tier 2 payments have rarely been above $2,500. The figure below details Tier 2 payments for Montana by domain.

Figure 23: Montana Tier 2 Payments by Domain



As shown in Figure 24, Montana's overall monthly order volumes declined significantly from their peak in 2004 to 2005 driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the 1996 Telecommunications Act. In the middle of 2005, Montana experienced a significant increase in order volumes, driven primarily by orders for number ports. LNP orders have dominated since then and remained fairly constant after 2005. Resale order volumes have continued to decline while UNE Loop volumes have remained relatively constant throughout the Study Period.

Figure 24: Montana Ordering Volumes



As shown on Figure 25, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Montana also experienced declining volumes of Resale lines during the Study Period, which has been offset by gains in UNE Loops and lines provided through other services.

Figure 25: Montana Lines in Service

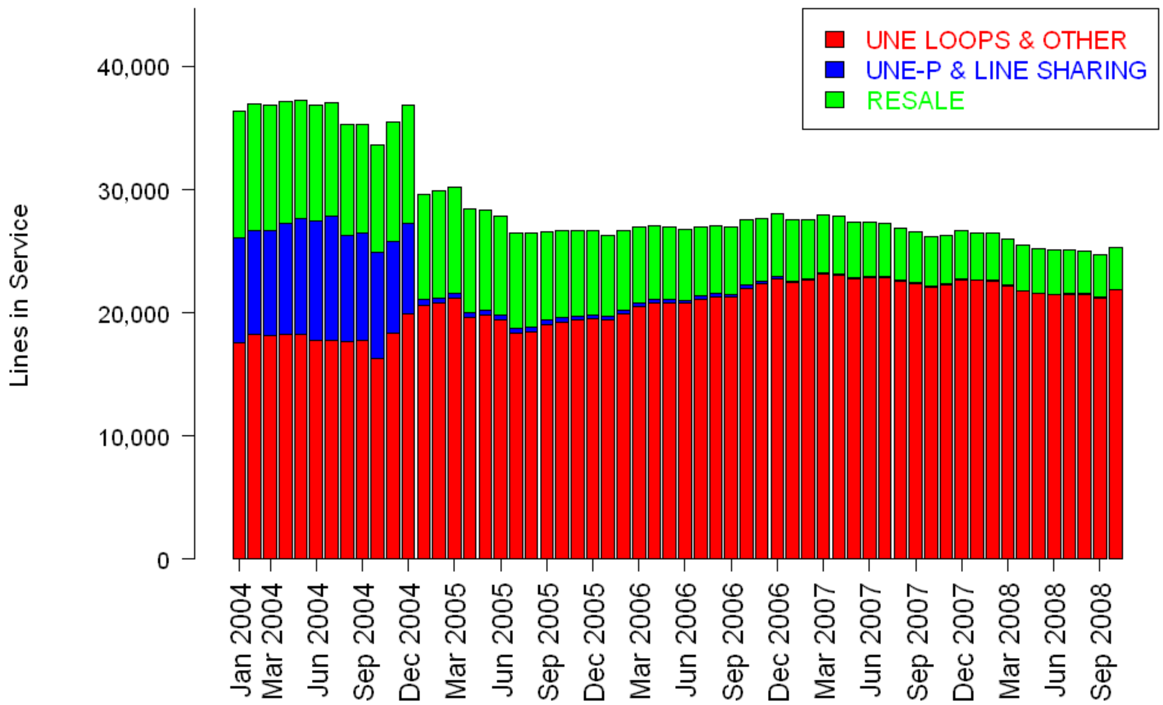


Table 9 shows the monthly CLEC aggregate order volumes for Montana from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. Order volumes for all the products were extremely small and never exceeded four per month for all CLECs.

Table 9
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Montana

Date	UBL-DS3 Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	2	1	0
Feb 2007	0	0	0	4	0	0
Mar 2007	0	0	0	1	3	0
Apr 2007	0	0	0	0	3	0
May 2007	0	0	0	4	1	0
June 2007	0	0	0	3	0	0
July 2007	0	0	0	2	0	0
Aug 2007	0	0	0	1	2	0
Sep 2007	0	0	0	1	0	0
Oct 2007	0	0	0	3	0	0
Nov 2007	0	0	0	1	0	0
Dec 2007	0	0	0	0	0	0
Jan 2008	0	0	0	0	0	0
Feb 2008	0	0	0	2	3	0
Mar 2008	0	0	0	0	2	0
Apr 2008	0	0	0	0	1	0
May 2008	0	0	0	0	0	0
June 2008	0	0	0	1	0	0
July 2008	0	0	0	0	0	0
Aug 2008	1	0	0	2	0	0
Sep 2008	0	0	0	0	0	0
Oct 2008	0	0	0	1	1	0

Table 10 shows the monthly trouble report volumes in Montana for the five products that Liberty recommends for removal from the MR measures in the PAP. The number of trouble reports was extremely small for all the products and never exceed two per month.

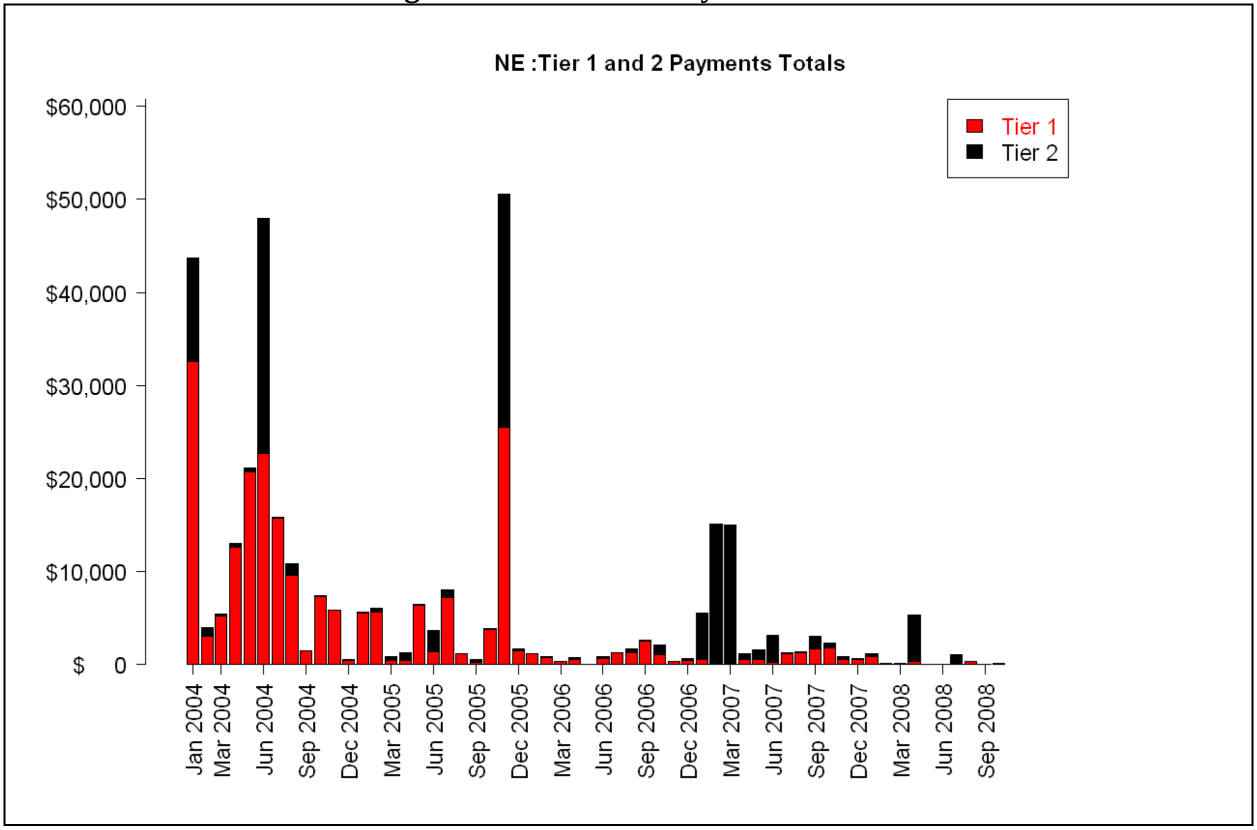
Table 10
Trouble Report Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Montana

Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	0	0
Feb 2007	0	0	0	0	1
Mar 2007	0	0	0	0	0
Apr 2007	0	0	0	1	0
May 2007	0	0	0	1	0
June 2007	0	0	0	1	0
July 2007	0	0	0	0	0
Aug 2007	0	0	0	1	0
Sep 2007	0	0	0	2	0
Oct 2007	0	0	0	0	0
Nov 2007	0	0	0	2	0
Dec 2007	0	0	0	2	0
Jan 2008	0	0	0	1	0
Feb 2008	0	0	0	1	0
Mar 2008	0	0	0	0	0
Apr 2008	0	0	0	1	0
May 2008	0	0	0	2	0
June 2008	0	0	0	0	0
July 2008	0	0	0	1	0
Aug 2008	0	0	0	0	0
Sep 2008	0	0	0	1	0
Oct 2008	0	0	0	1	0

F. Nebraska

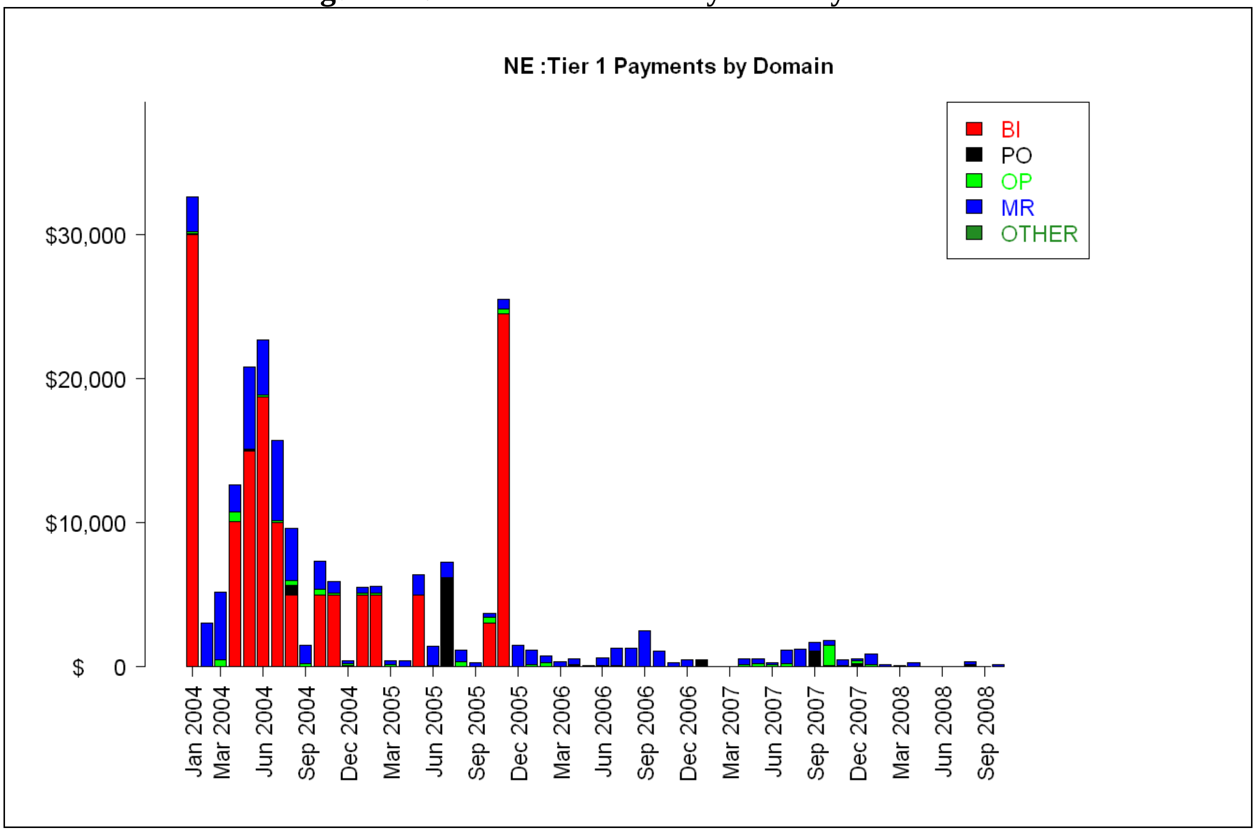
Nebraska's Tier 1 and Tier 2 payments followed the pattern found in most states in that payment amounts were larger in 2004, but slowly dropped over time. In late 2004 and early 2005, payments were in excess of $10,000 in many months. Since early 2008, payments have averaged less than $5,000 per month. The figure below shows total payments in Nebraska, with Tier 1 and Tier 2 shown in red and black, respectively. Unlike several other states, Tier 2 payments continued to be an occasional, but significant percentage of payments throughout the Study Period.

Figure 26: Nebraska Payment Totals



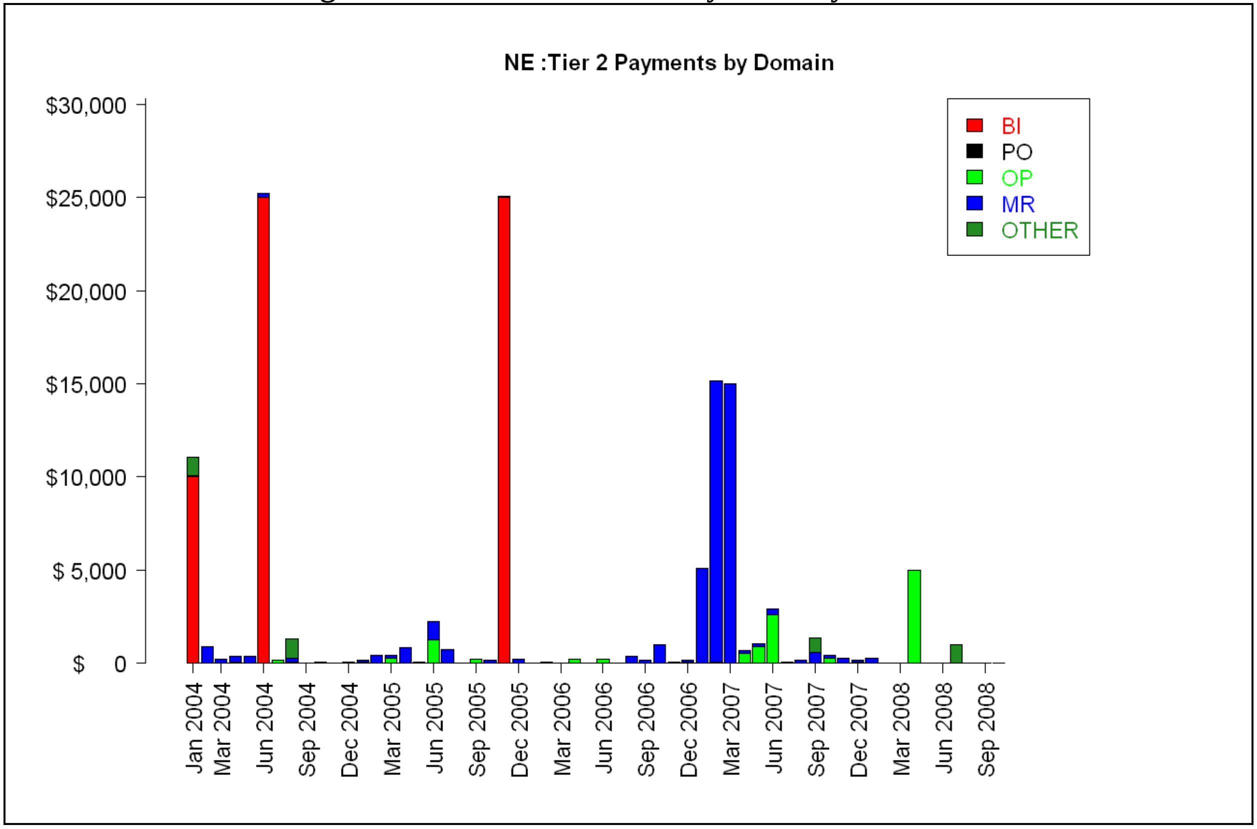
The next figure shows Nebraska Tier 1 payments by domain. Payments related to Billing were substantial through 2005. Payments related to Maintenance & Repair were smaller and fell off after 2005.

Figure 27: Nebraska Tier 1 Payments by Domain



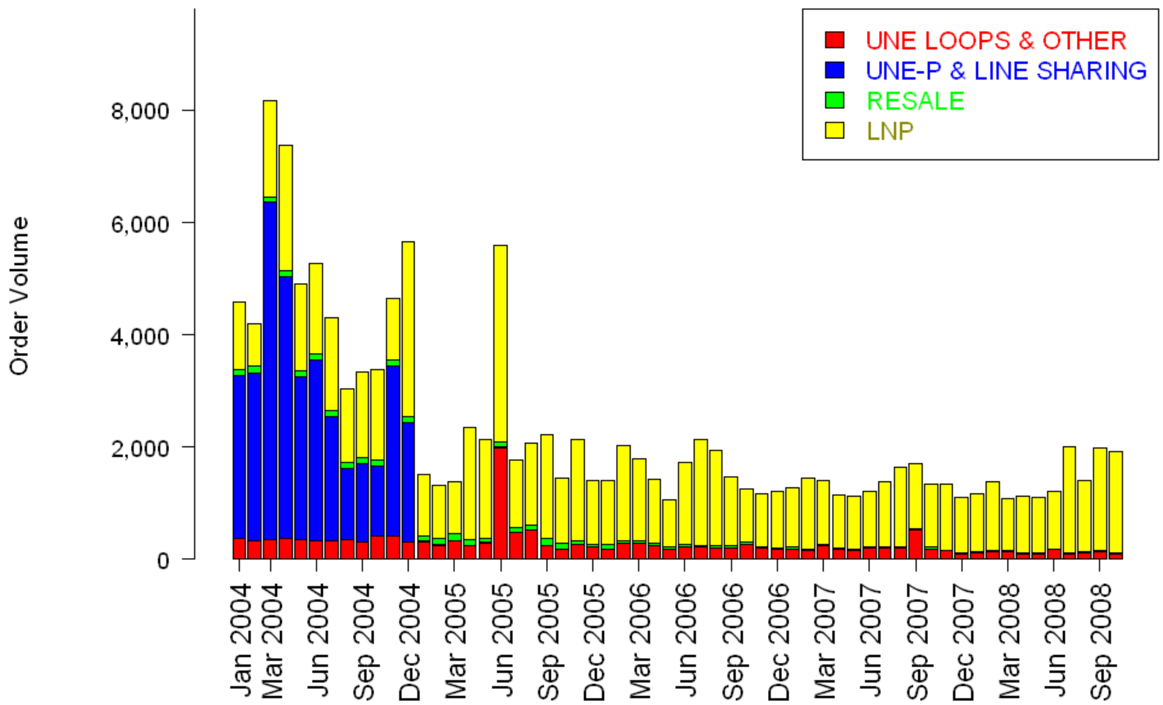
Tier 2 payments for Nebraska were dominated by Billing measures in the early period and MR and OP measures in the later period. Overall Tier 2 payments have rarely been above $5,000. The figure below details Tier 2 payments for Nebraska by domain.

Figure 28: Nebraska Tier 2 Payments by Domain



As shown in Figure 29, Nebraska's overall monthly order volumes declined from their peaks in 2004 to 2005, driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the 1996 Telecommunications Act. Since the start of 2005 there has not been too much variability in the total monthly order volumes in Nebraska with the exception of a single-month spike in June 2005. Nebraska has experienced a generally gradual decline in Resale orders, and to a lesser extent in UNE Loop orders, throughout the Study Period. There has been a slight decline in LNP orders but this ordering type dominates.

Figure 29: Nebraska Ordering Volumes



As shown on Figure 30, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Since 2005, Nebraska's UNE Loop volumes have experienced a gradual decline. Resale lines, which were never very significant, have continued to decline during the course of the five year period.

Figure 30: Nebraska Lines in Service

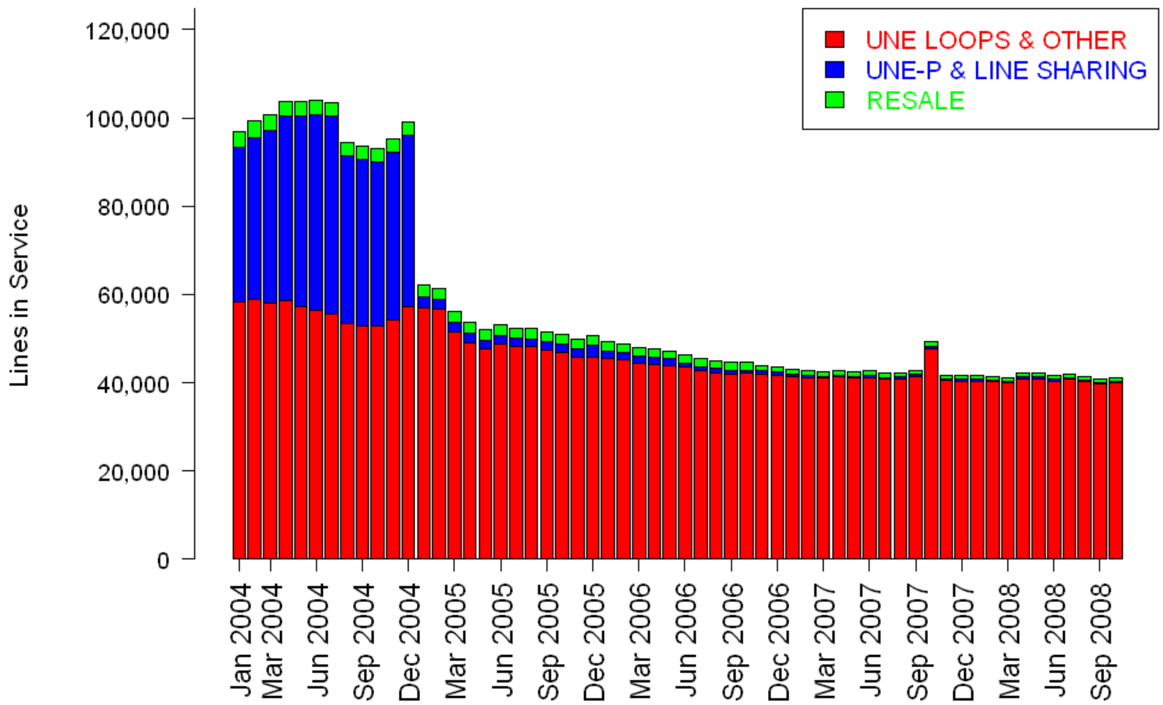


Table 11 shows the monthly CLEC aggregate order volumes for Nebraska from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. Orders for UBL – ISDN Capable Loops product exceeded ten transactions per month in only one month. The volumes in the other months were extremely low. The monthly volumes of the other products were also very small.

Table 11
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Nebraska

Date	UBL-DS3 Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	0	5	0
Feb 2007	0	0	0	0	0	0
Mar 2007	0	0	0	0	12	0
Apr 2007	0	1	0	0	0	0
May 2007	0	0	0	5	0	0
June 2007	0	0	0	4	0	0
July 2007	0	0	0	0	0	0
Aug 2007	0	1	0	0	4	0
Sep 2007	0	0	0	0	4	0
Oct 2007	0	1	0	0	1	0
Nov 2007	0	1	0	5	4	0
Dec 2007	0	0	0	0	1	0
Jan 2008	0	0	0	1	3	0
Feb 2008	0	0	0	10	1	0
Mar 2008	0	0	0	0	1	0
Apr 2008	0	0	0	2	0	0
May 2008	0	0	0	0	2	0
June 2008	0	0	0	0	0	0
July 2008	0	0	0	0	0	0
Aug 2008	0	0	0	0	0	0
Sep 2008	0	0	0	0	3	0
Oct 2008	0	0	0	0	0	0

Table 12 shows the monthly trouble report volumes in Nebraska for the five products that Liberty recommends for removal from the MR measures in the PAP. The monthly number of trouble reports for all CLECs was generally very small and never exceeded eight for any of the products.

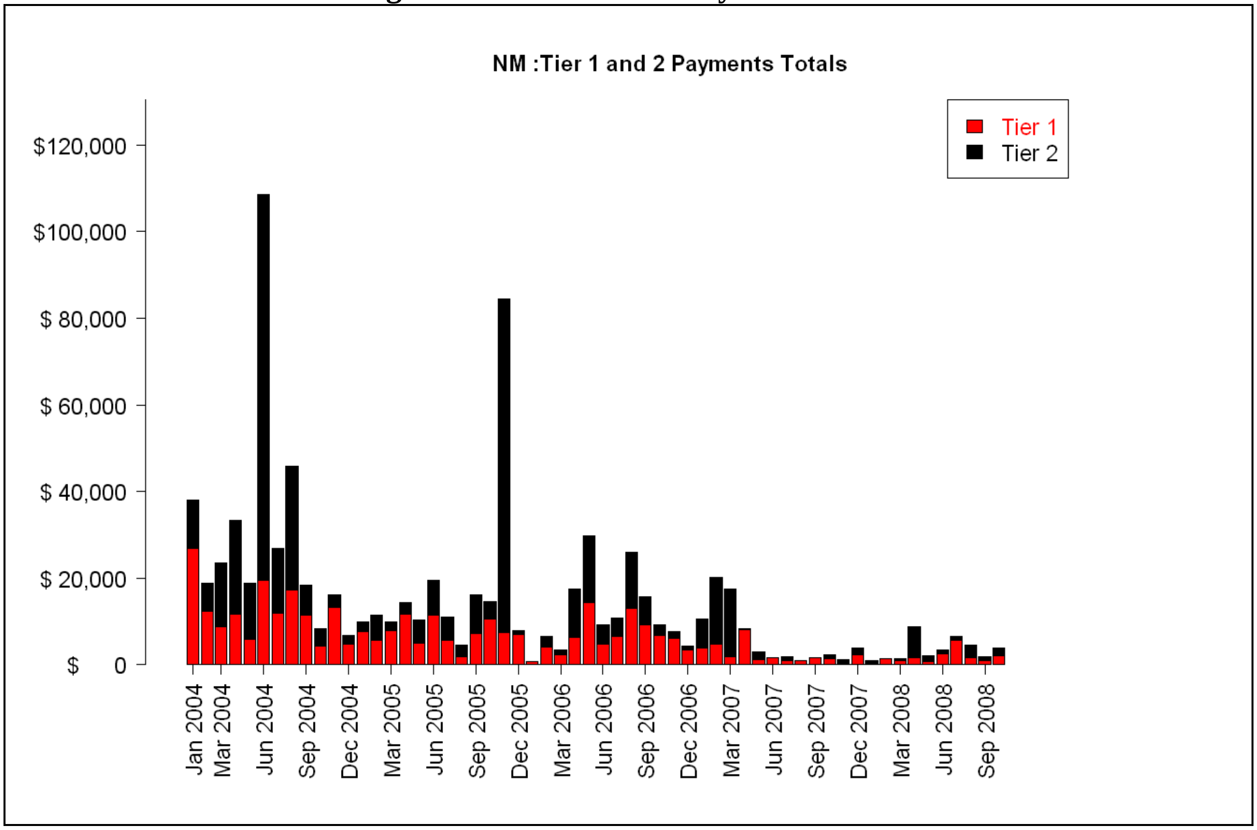
Table 12
Trouble Report Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Nebraska

Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	2	0
Feb 2007	0	0	0	1	0
Mar 2007	0	0	0	3	0
Apr 2007	0	1	0	5	0
May 2007	0	0	0	2	0
June 2007	0	0	0	2	0
July 2007	0	0	0	4	0
Aug 2007	0	0	0	8	0
Sep 2007	0	0	0	1	0
Oct 2007	0	0	0	4	0
Nov 2007	0	3	0	2	0
Dec 2007	0	0	0	1	0
Jan 2008	0	4	0	1	0
Feb 2008	0	1	0	1	0
Mar 2008	0	0	0	0	0
Apr 2008	0	1	0	2	0
May 2008	0	1	0	4	0
June 2008	0	0	0	1	0
July 2008	0	0	0	2	0
Aug 2008	0	0	0	5	0
Sep 2008	0	0	0	1	0
Oct 2008	0	2	0	2	0

G. New Mexico

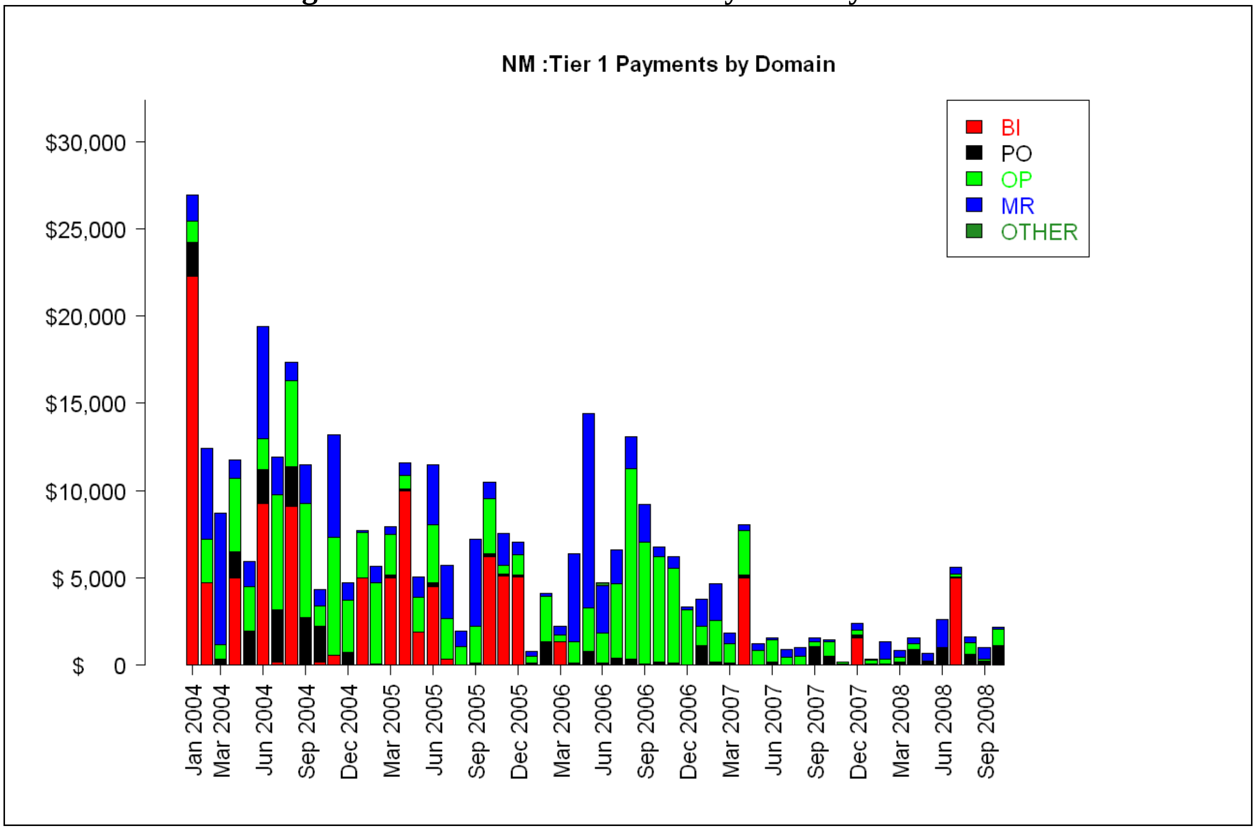
New Mexico's Tier 1 and Tier 2 payments followed the pattern found in most states in that payment amounts were somewhat erratic, but slowly dropped over time. In late 2004 and early 2005, payments were in excess of $20,000 in many months. Since early 2008, payments have averaged less than $5,000 per month. The figure below shows total payments in New Mexico, with Tier 1 and Tier 2 shown in red and black, respectively.

Figure 31: New Mexico Payment Totals



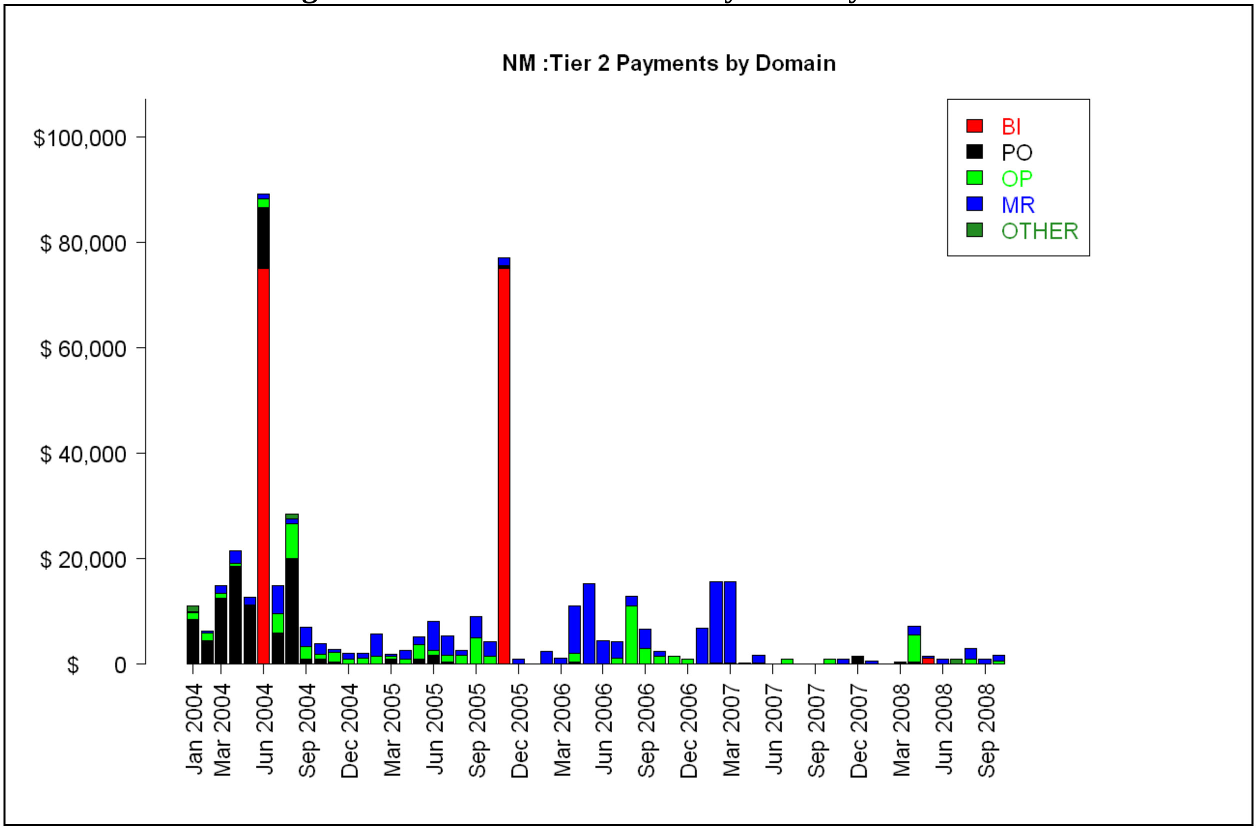
The next figure shows New Mexico Tier 1 payments by domain. Payments related to Billing are substantial throughout the Study Period, as are payments related to MR and OP. In the early part of the Study Period, significant payments were made related to PO measures (pre-ordering functions). OP measures dominated Tier 1 payments after 2006.

Figure 32: New Mexico Tier 1 Payments by Domain



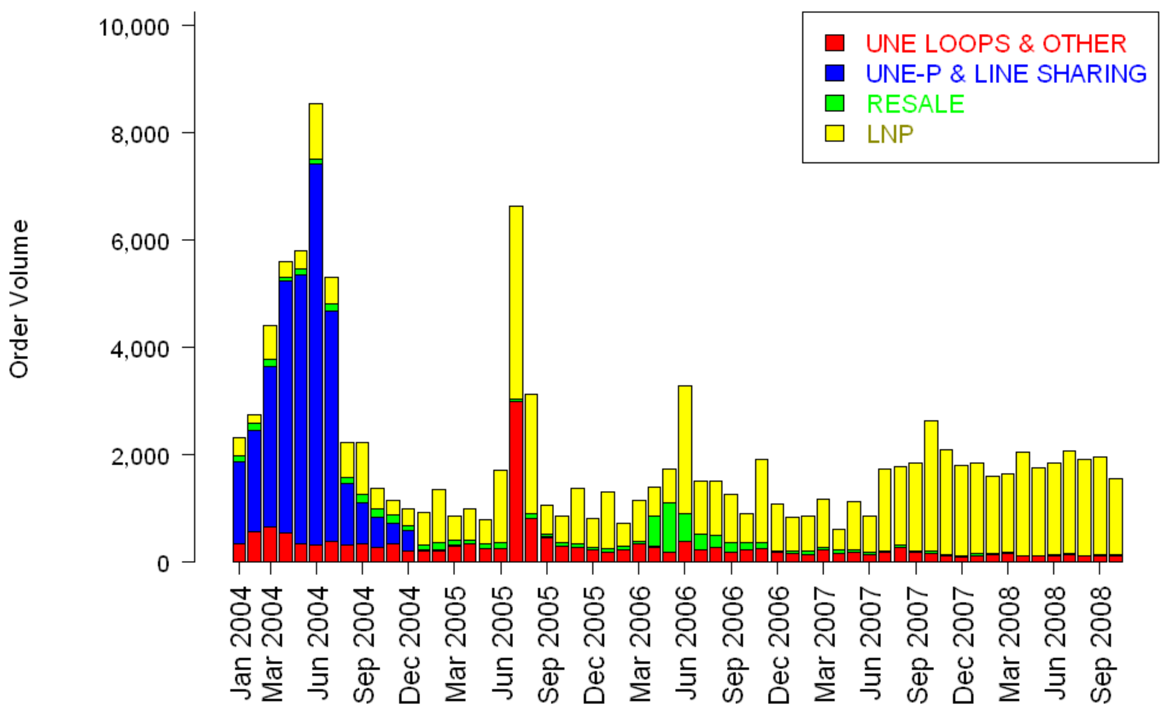
The largest Tier 2 payments for New Mexico were for Billing measures. Additionally, Pre-Ordering measures played an important early role while Maintenance & Repair measures became more important in 2007 and 2008. Overall Tier 2 payments have rarely been above $10,000 in recent years. The figure below details Tier 2 payments for New Mexico by domain.

Figure 33: New Mexico Tier 2 Payments by Domain



As shown in Figure 34, New Mexico's overall monthly order volumes declined from their peaks in 2004 to 2005, driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the 1996 Telecommunications Act. Since the start of 2005 New Mexico has experienced some variability in its order volumes with some peaks in UNE Loop orders in mid-2005 and a peak in Resale orders in mid-2006. However, New Mexico has generally experienced a gradual decline in both UNE Loop and Resale orders. LNP order volumes in the state have become fairly consistent since mid 2007 and now dominate.

Figure 34: New Mexico Ordering Volumes



As shown on Figure 35, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Since 2005, New Mexico's UNE Loop volumes have generally experienced a gradual decline. Resale lines, which were never very significant, have continued to decline during the course of the Study Period.

Figure 35: New Mexico Lines in Service

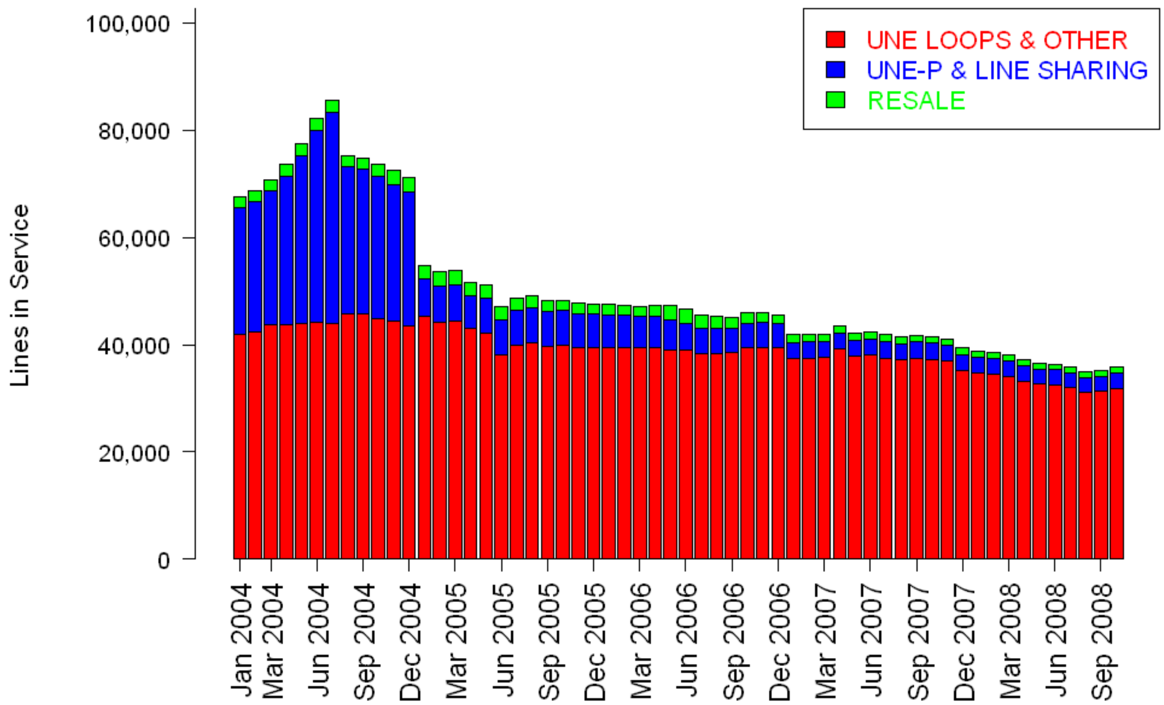


Table 13 shows the monthly CLEC aggregate order volumes for New Mexico from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. The ordering volumes were extremely low for all products and never exceeded four in a month.

Table 13
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
New Mexico

Date	UBL-DS3 Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	1	0	1	1	0
Feb 2007	0	1	0	0	0	0
Mar 2007	0	0	0	0	1	0
Apr 2007	0	1	0	0	1	0
May 2007	0	0	0	0	1	0
June 2007	0	2	0	0	0	0
July 2007	0	0	0	0	2	0
Aug 2007	0	1	0	0	3	0
Sep 2007	0	0	0	0	0	0
Oct 2007	0	0	0	0	4	0
Nov 2007	0	0	0	0	1	0
Dec 2007	0	0	0	0	0	0
Jan 2008	0	0	0	0	2	0
Feb 2008	0	0	0	0	2	0
Mar 2008	0	3	0	0	0	0
Apr 2008	0	0	0	0	1	0
May 2008	0	0	0	0	1	1
June 2008	0	0	0	0	1	0
July 2008	0	0	0	0	1	0
Aug 2008	0	0	0	0	0	0
Sep 2008	0	1	0	0	1	0
Oct 2008	0	0	0	0	3	0

Table 14 shows the monthly trouble report volumes in New Mexico for the five products that Liberty recommends for removal from the MR measures in the PAP. The number of monthly troubles was low for all volumes and never exceeded ten in a month.

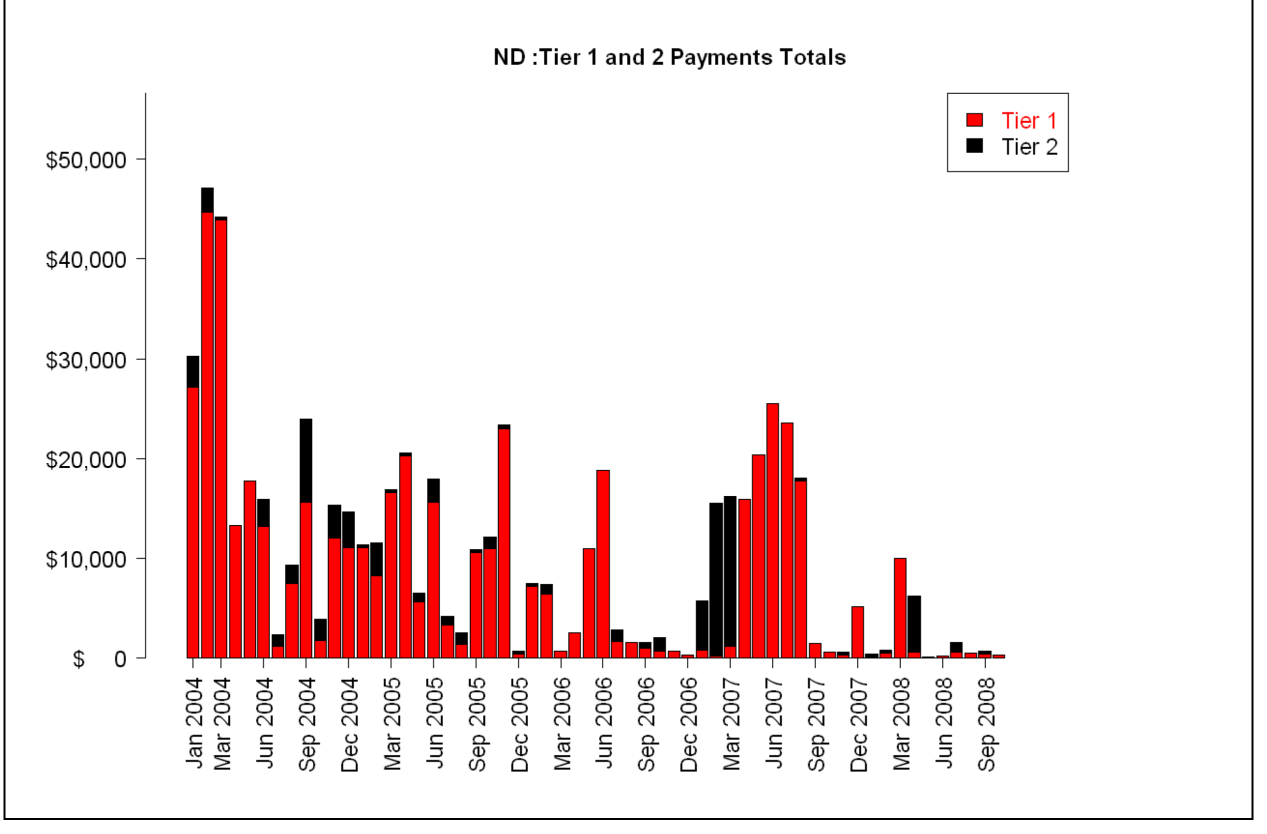
Table 14
Trouble Report Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
New Mexico

Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	1	0	6	0
Feb 2007	0	0	0	7	0
Mar 2007	0	0	0	4	0
Apr 2007	0	1	0	4	0
May 2007	0	0	0	7	3
June 2007	0	0	0	4	0
July 2007	0	0	0	8	0
Aug 2007	0	0	0	2	4
Sep 2007	0	1	0	9	2
Oct 2007	0	1	0	4	0
Nov 2007	0	1	0	10	2
Dec 2007	0	0	0	8	2
Jan 2008	0	2	0	6	1
Feb 2008	0	1	0	3	0
Mar 2008	0	1	0	1	0
Apr 2008	0	1	0	3	1
May 2008	0	2	0	2	1
June 2008	0	0	0	2	1
July 2008	0	1	0	5	0
Aug 2008	0	2	0	3	0
Sep 2008	0	0	0	2	1
Oct 2008	0	1	0	2	1

H. North Dakota

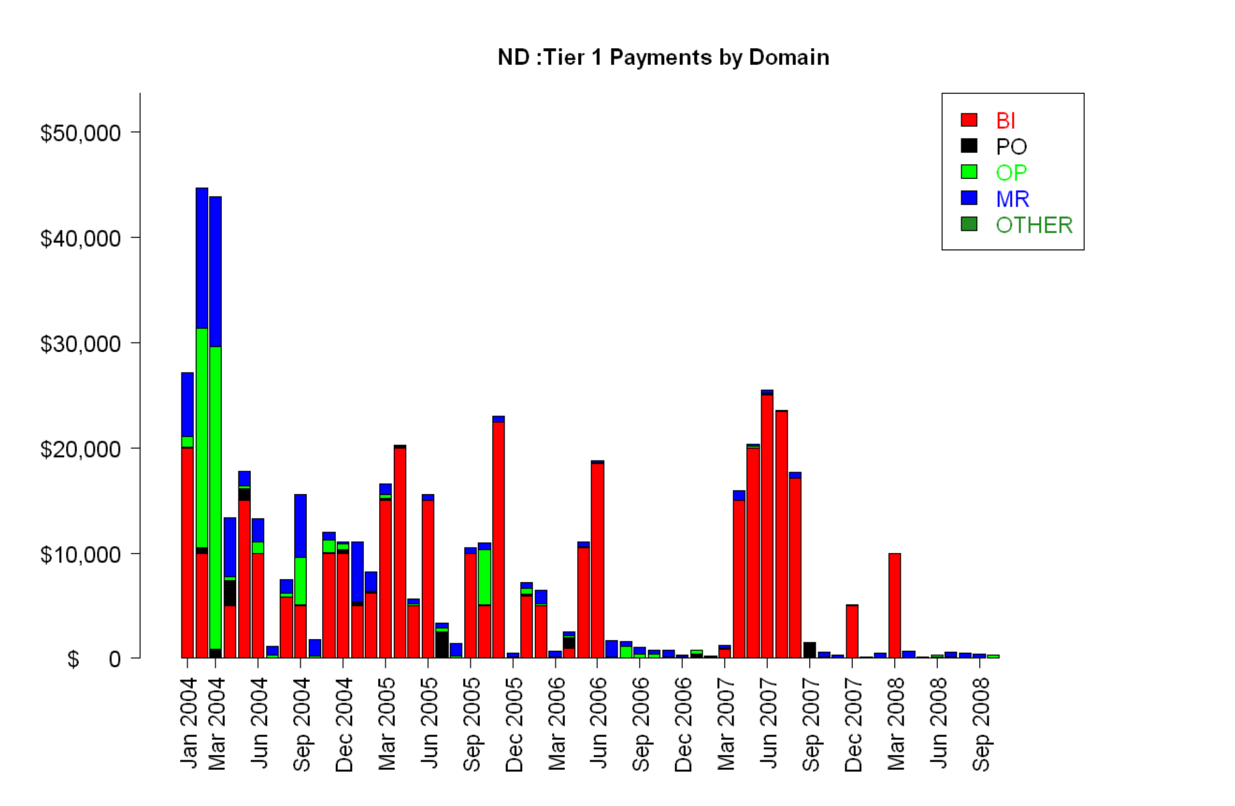
North Dakota's Tier 1 and Tier 2 payments followed the pattern found in most states in that payment amounts were erratic, but slowly dropped over time. In late 2004 and early 2005, payments were in excess of $10,000 in many months. Since early 2008, payments have averaged less than $5,000 per month. The figure below shows total payments in North Dakota, with Tier 1 and Tier 2 shown in red and black, respectively. Occasional failures, resulting in Tier 1 payments, continued to occur through 2008, but few Tier 2 payments occurred after March 2007.

Figure 36: North Dakota Payment Totals



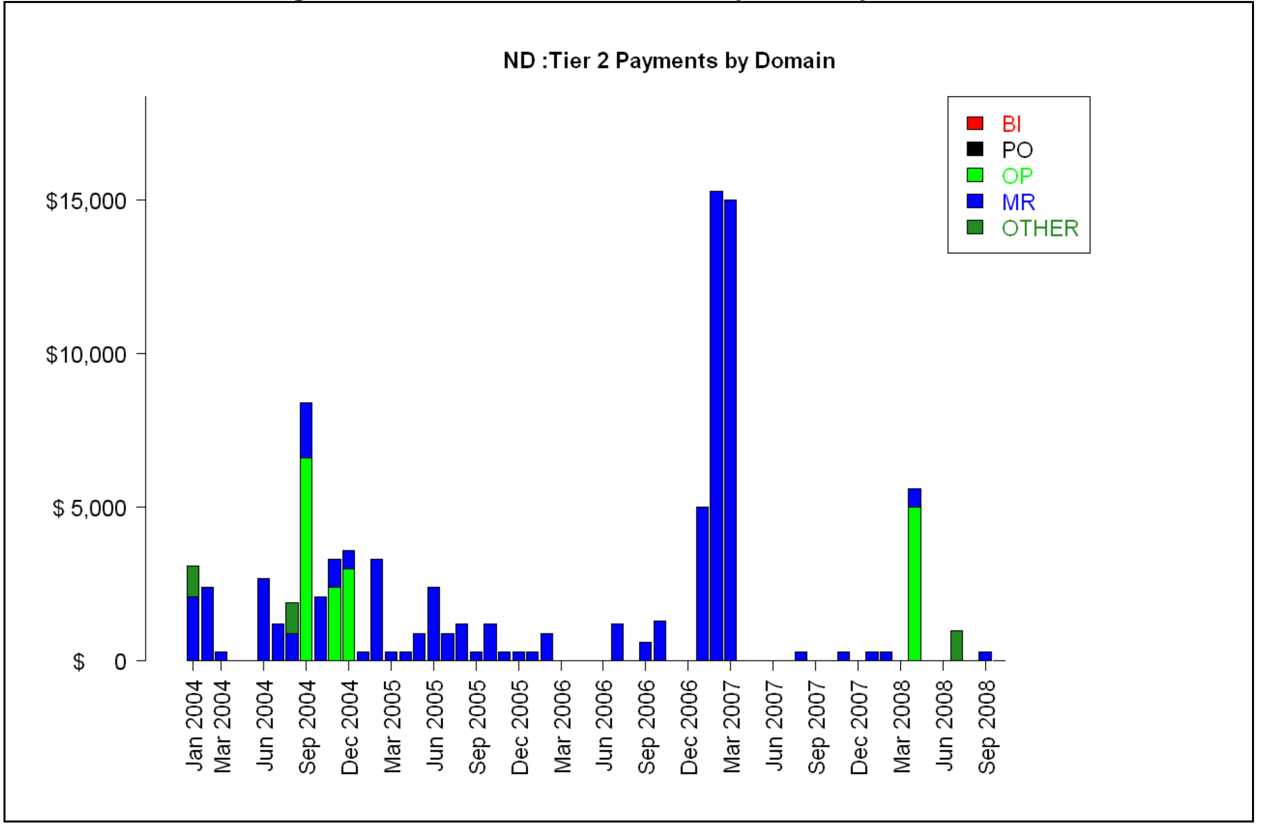
The next figure shows North Dakota Tier 1 payments by domain. Payments related to Billing are substantial throughout the Study Period, and payments related to Maintenance & Repair and Provisioning were important in 2004.

Figure 37: North Dakota Tier 1 Payments by Domain



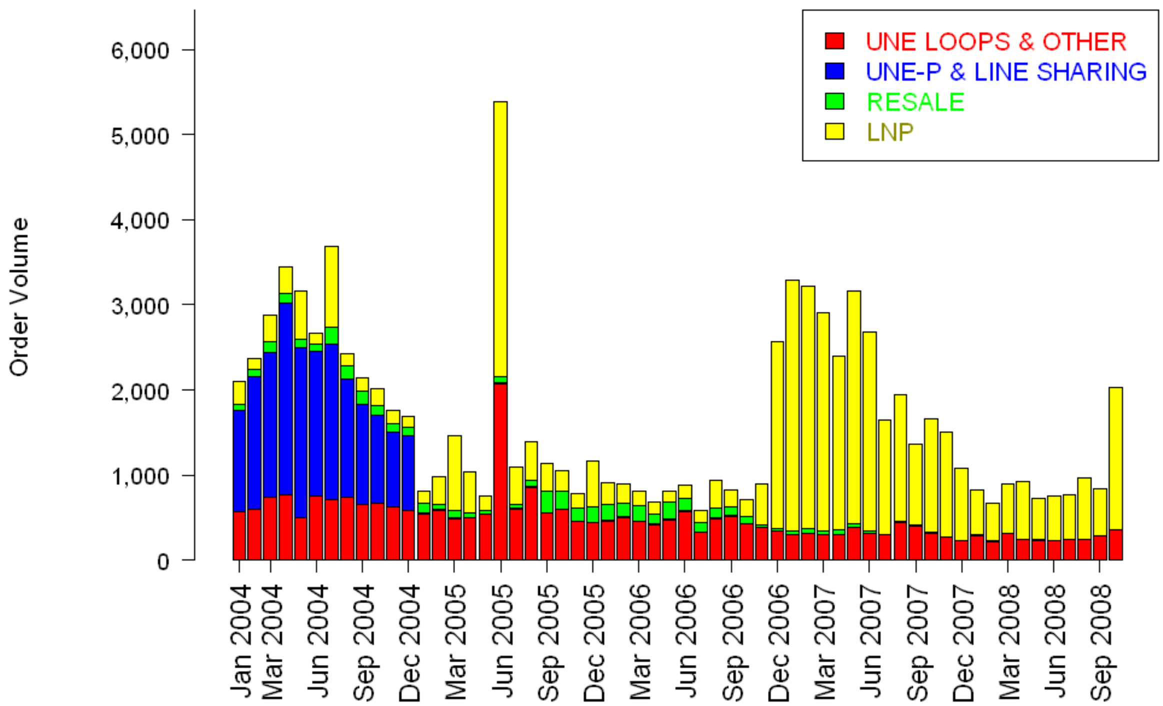
Tier 2 payments for North Dakota were dominated by MR measures, with OP measures occasionally responsible for a significant percentage of payments. Overall Tier 2 payments have rarely been above $4,000. The figure below details Tier 2 payments for North Dakota by domain.

Figure 38: North Dakota Tier 2 Payments by Domain



North Dakota's overall monthly order volumes declined significantly in early 2005 from their monthly 2004 rates as shown on Figure 39. This decline was driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the 1996 Telecommunications Act. Since the start of 2005, with the exception of June 2005 during which there was a spike in both UNE Loop and LNP orders, order volumes remained fairly constant until December of 2006. At that that time, there was a large increase in LNP orders that lasted through June 2007 but has generally declined since then. Orders for both Resale services and, to a much lesser extent, UNE Loops have been declining since 2006.

Figure 39: North Dakota Ordering Volumes



As shown on Figure 40, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Since 2005, North Dakota's UNE Loop and Resale line volumes have experienced a gradual decline.

Figure 40: North Dakota Lines in Service

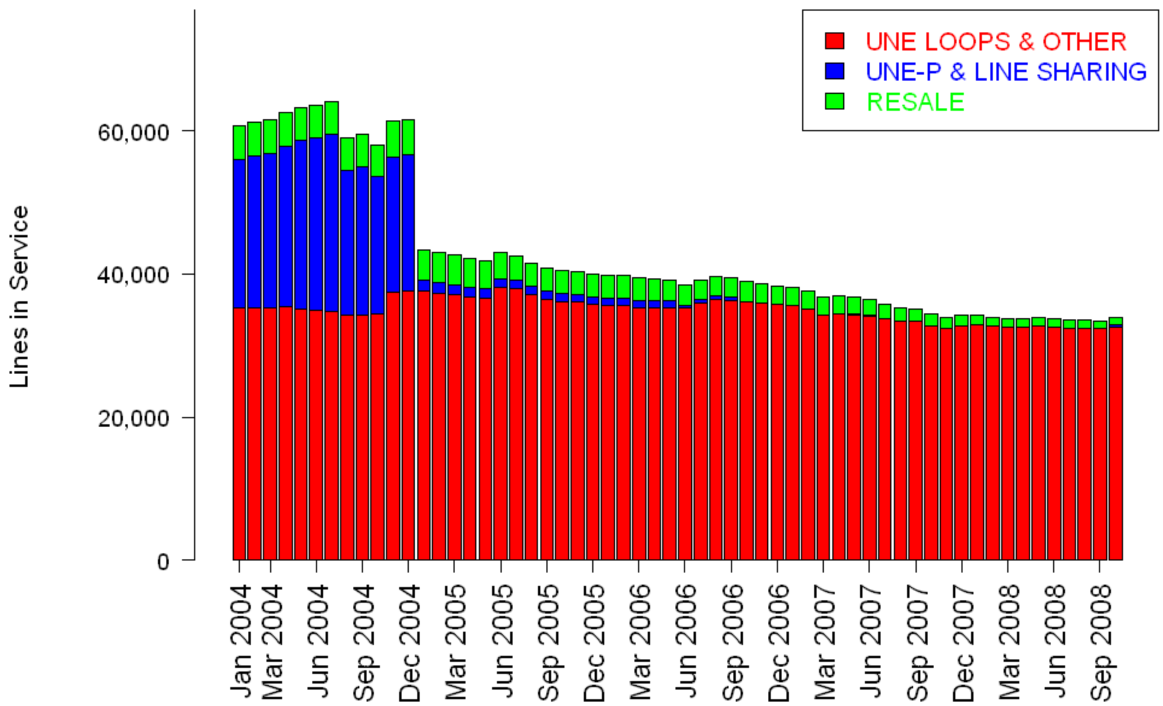


Table 15 shows the monthly CLEC aggregate order volumes for North Dakota from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. UBL – 4-Wire Non-Loaded Loop order volumes exceeded ten transactions per month only in March 2007. Monthly volumes for the other months were extremely low. The volumes for the other products were always zero.

Table 15
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
North Dakota

Date	UBL-DS3 Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	1	0	0	0
Feb 2007	0	0	4	0	0	0
Mar 2007	0	0	11	0	0	0
Apr 2007	0	0	5	0	0	0
May 2007	0	0	0	0	0	0
June 2007	0	0	1	0	0	0
July 2007	0	0	0	0	0	0
Aug 2007	0	0	1	1	0	0
Sep 2007	0	0	0	0	0	0
Oct 2007	0	0	0	0	0	0
Nov 2007	0	0	1	0	0	0
Dec 2007	0	0	0	0	0	0
Jan 2008	0	0	0	0	0	0
Feb 2008	0	0	0	0	0	0
Mar 2008	0	0	1	0	0	0
Apr 2008	0	0	0	0	0	0
May 2008	0	0	1	0	0	0
June 2008	0	0	0	0	0	0
July 2008	0	0	2	0	0	0
Aug 2008	0	0	0	0	0	0
Sep 2008	0	0	1	0	0	0
Oct 2008	0	0	0	0	0	0

Table 16 shows the monthly trouble report volumes in North Dakota for the five products that Liberty recommends for removal from the MR measures in the PAP. The monthly number of trouble reports was always very small, never exceeding three in a month.

Table 16
Trouble Report Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
North Dakota

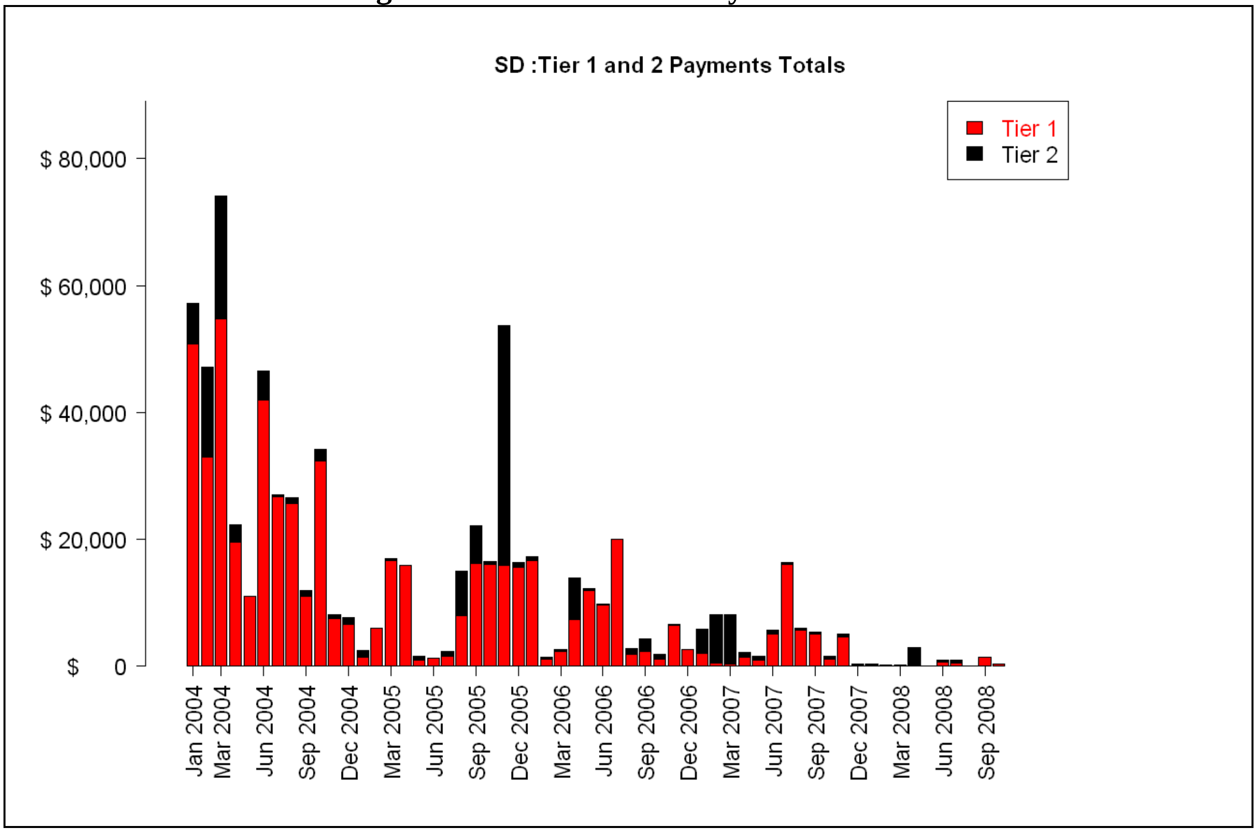
Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	1	0

Feb 2007	0	0	0	0	0
Mar 2007	0	0	0	1	0
Apr 2007	0	0	0	0	0
May 2007	0	0	0	1	0
June 2007	0	0	0	1	0
July 2007	0	0	0	1	0
Aug 2007	0	0	0	0	0
Sep 2007	0	0	0	0	0
Oct 2007	0	0	0	3	0
Nov 2007	0	0	0	0	0
Dec 2007	0	0	0	1	0
Jan 2008	0	0	0	0	0
Feb 2008	0	0	0	0	0
Mar 2008	0	0	0	1	0
Apr 2008	0	0	0	0	0
May 2008	0	0	0	0	0
June 2008	0	0	0	0	0
July 2008	0	0	0	1	0
Aug 2008	0	0	0	1	0
Sep 2008	0	0	0	0	0
Oct 2008	0	0	0	1	0

I. South Dakota

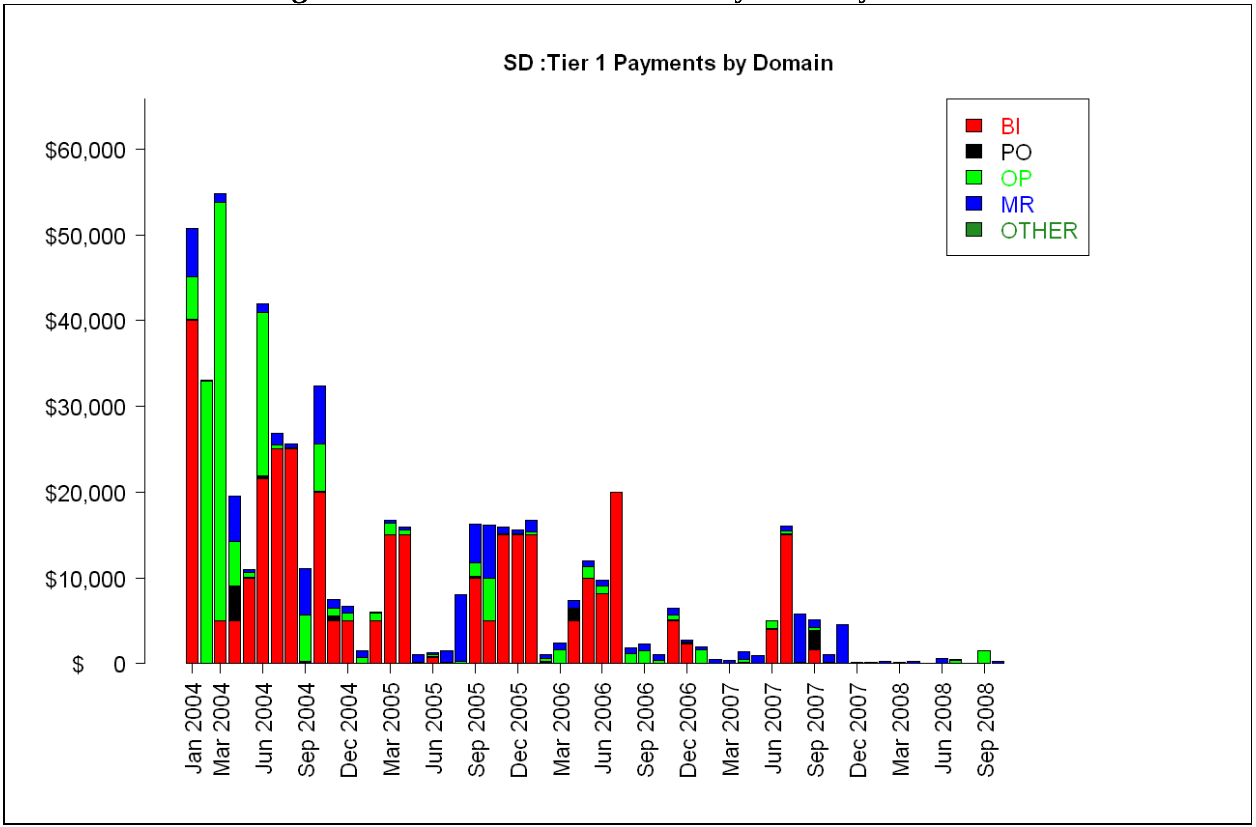
South Dakota's Tier 1 and Tier 2 payments followed the pattern found in most states in that payment amounts were high at first, but slowly dropped over time. In late 2004 and early 2005, payments were in excess of $20,000 in many months. Since early 2008, payments have averaged less than $5,000 per month. The figure below shows total payments in South Dakota, with Tier 1 and Tier 2 shown in red and black, respectively. Occasional failures, resulting in Tier 1 payments, continued to occur through 2008, but few Tier 2 payments occurred after March 2007.

Figure 41: South Dakota Payment Totals



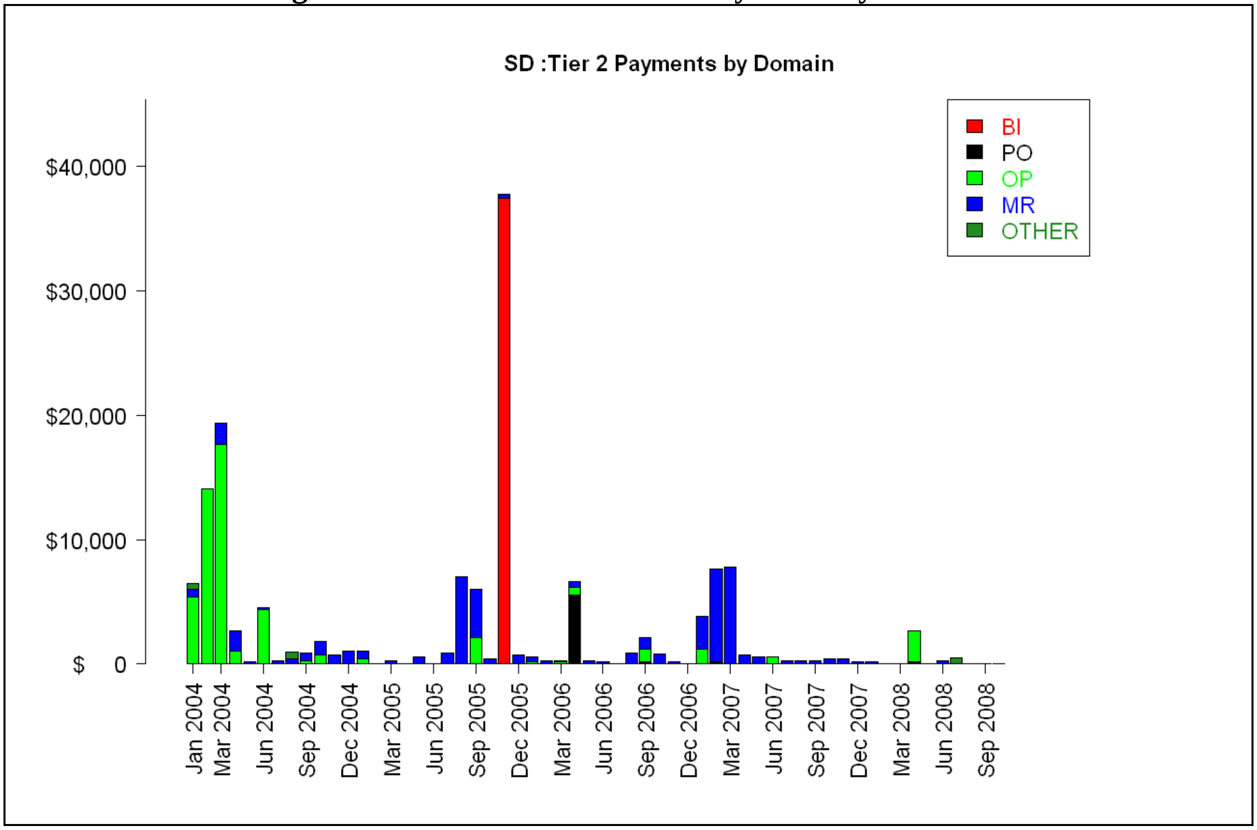
The next figure shows South Dakota Tier 1 payments by domain. Payments related to Billing are substantial throughout the Study Period, while payments related to Maintenance & Repair and Provisioning are more episodic.

Figure 42: South Dakota Tier 1 Payments by Domain



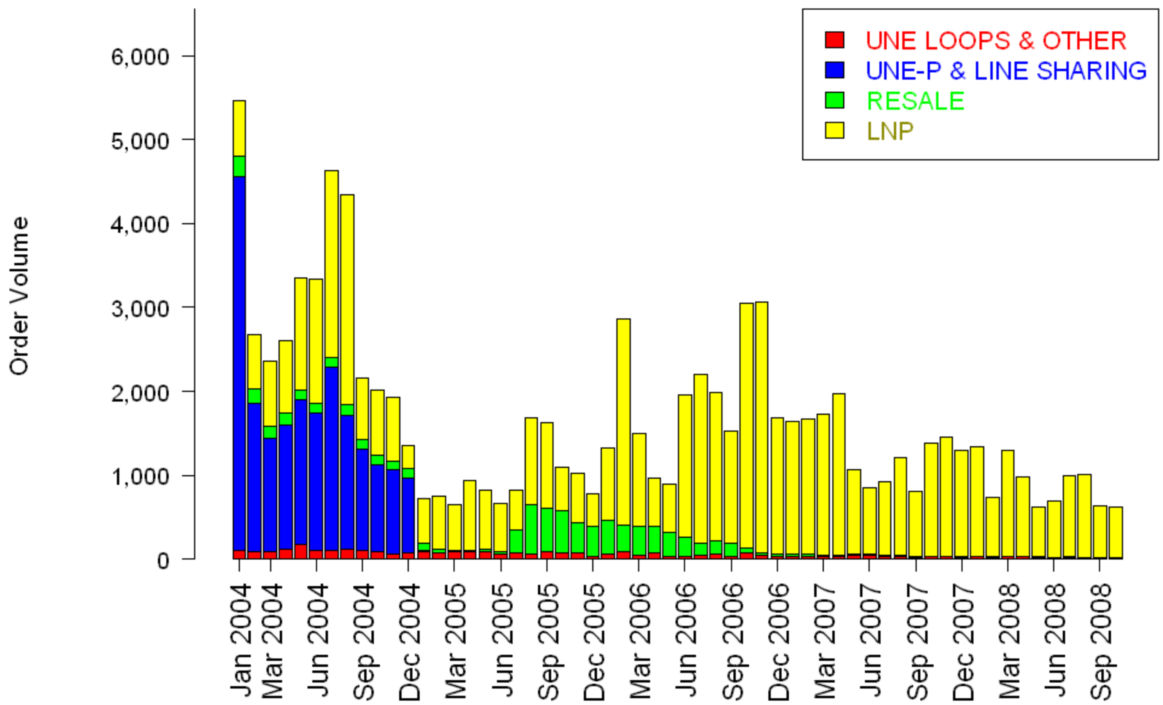
Tier 2 payments for South Dakota were dominated by MR measures, with OP measures occasionally responsible for a significant percentage of payments. An exception is November 2005, where South Dakota received a payment of more than $30,000 related to Billing. Overall Tier 2 payments have rarely been above $10,000. The figure below details Tier 2 payments for South Dakota by domain.

Figure 43: South Dakota Tier 2 Payments by Domain



As shown on Figure 44, South Dakota's overall monthly order volumes declined significantly in early 2005 from their monthly 2004 rates. This decline was driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the 1996 Telecommunications Act. Resale ordering increased from mid 2005 through mid 2006 but decreased markedly after that time. There was also some UNE order activity from 2004 through late 2006 that also tapered off to just a handful of orders in 2007 and 2008. As shown on the graph, since late 2006 order volumes in South Dakota are dominated by LNP orders.

Figure 44: South Dakota Ordering Volumes



As shown on Figure 45, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. South Dakota's UNE Loop and Resale line volumes have experienced a gradual decline over the entire Study Period.

Figure 45: South Dakota Lines in Service

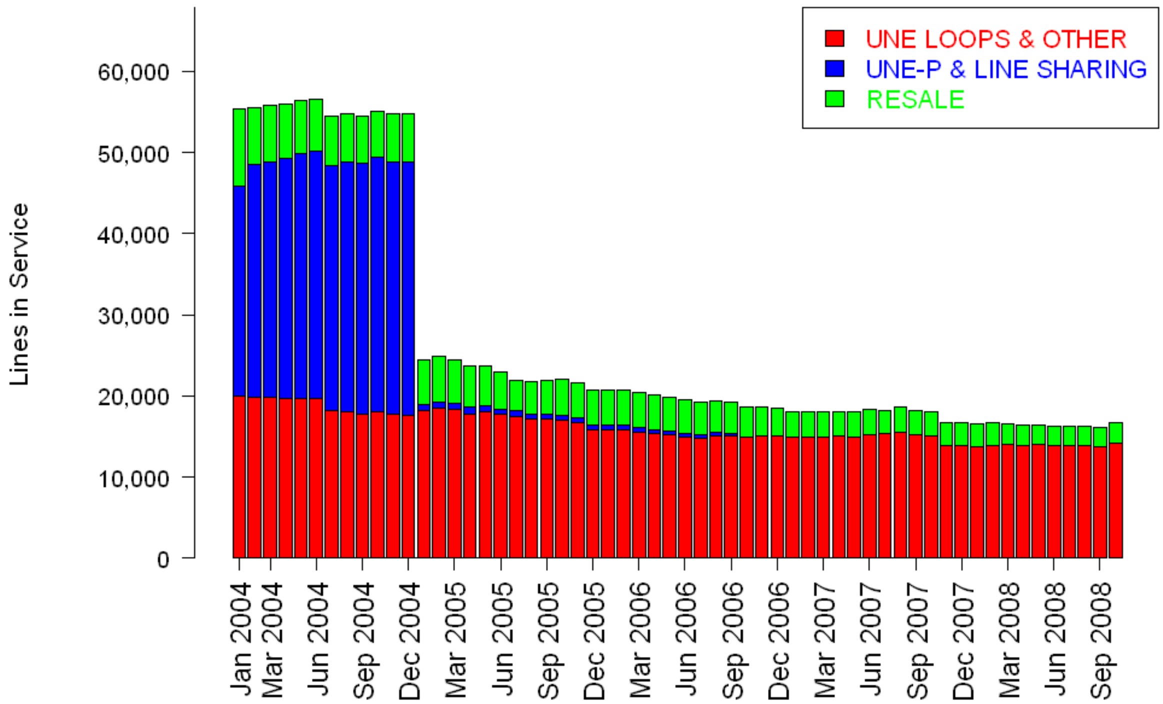


Table 17 shows the monthly CLEC aggregate order volumes for South Dakota from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. All the volumes are extremely small, never exceeding two in a month.

Table 17
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
South Dakota

Date	UBL-DS3 Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	0	2	0
Feb 2007	0	0	0	0	0	0
Mar 2007	0	0	0	0	2	0
Apr 2007	0	0	0	0	0	0
May 2007	0	0	0	0	0	0
June 2007	0	0	0	0	2	0
July 2007	0	0	0	0	0	0
Aug 2007	0	0	0	0	1	0
Sep 2007	0	0	0	0	1	0
Oct 2007	0	0	0	0	0	0
Nov 2007	0	0	0	0	0	0
Dec 2007	0	0	0	0	0	0
Jan 2008	0	0	0	0	1	0
Feb 2008	0	0	0	0	0	0
Mar 2008	0	0	0	0	1	0
Apr 2008	0	0	0	0	1	0
May 2008	0	0	0	0	0	0
June 2008	0	0	0	0	0	0
July 2008	0	0	0	0	0	0
Aug 2008	0	0	0	0	1	0
Sep 2008	0	0	0	0	0	0
Oct 2008	0	0	0	0	0	0

Table 18 shows the monthly trouble report volumes in South Dakota for the five products that Liberty recommends for removal from the MR measures in the PAP. The monthly number of troubles for these products is extremely small, rarely exceeding zero and never more than one.

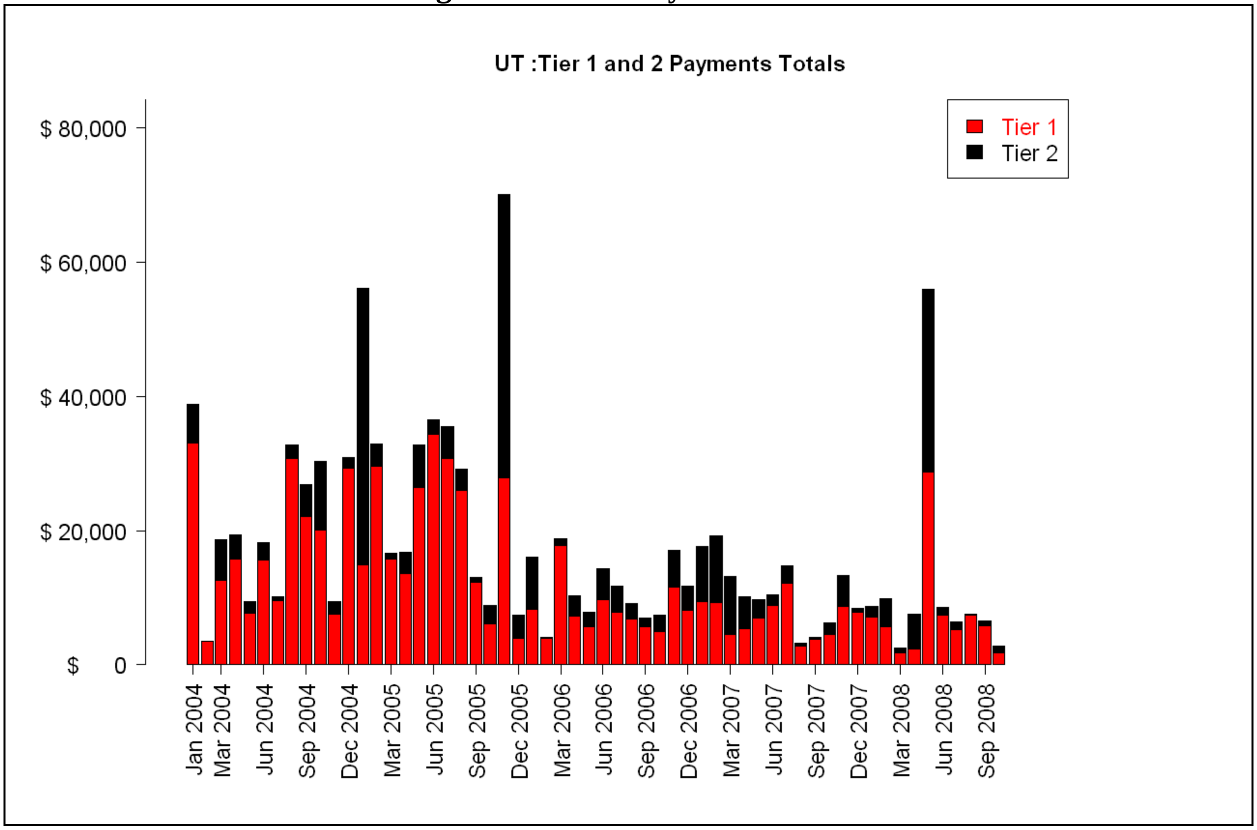
Table 18
Trouble Report Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
South Dakota

Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	0	0
Feb 2007	0	0	0	0	0
Mar 2007	0	0	0	1	0
Apr 2007	0	0	0	0	0
May 2007	0	0	0	0	0
June 2007	0	0	0	0	0
July 2007	0	0	0	0	0
Aug 2007	0	0	0	0	0
Sep 2007	0	0	0	0	0
Oct 2007	0	0	0	0	0
Nov 2007	0	0	0	1	0
Dec 2007	0	0	0	0	0
Jan 2008	0	0	0	0	0
Feb 2008	0	0	0	0	0
Mar 2008	0	0	0	0	0
Apr 2008	0	0	0	0	0
May 2008	0	0	0	0	0
June 2008	0	0	0	0	0
July 2008	0	0	0	0	0
Aug 2008	0	0	0	0	0
Sep 2008	0	0	0	0	0
Oct 2008	0	0	0	0	0

J. Utah

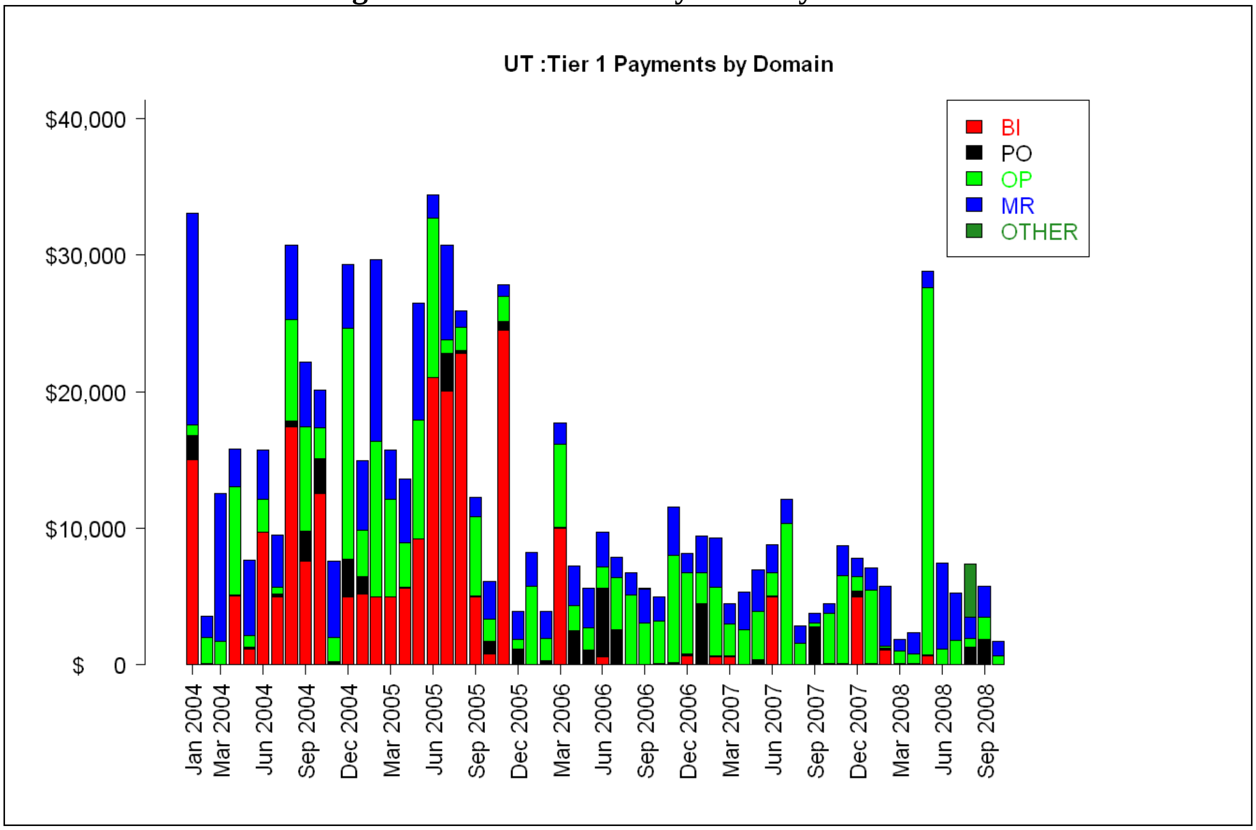
Utah's Tier 1 and Tier 2 payments followed the pattern found in most states in that payment amounts were erratic, but slowly dropped over time. In late 2004 and early 2005, payments were in excess of $25,000 in many months. Since early 2008, payments have averaged less than $10,000 per month. The figure below shows total payments in Utah, with Tier 1 and Tier 2 shown in red and black, respectively.

Figure 46: Utah Payment Totals



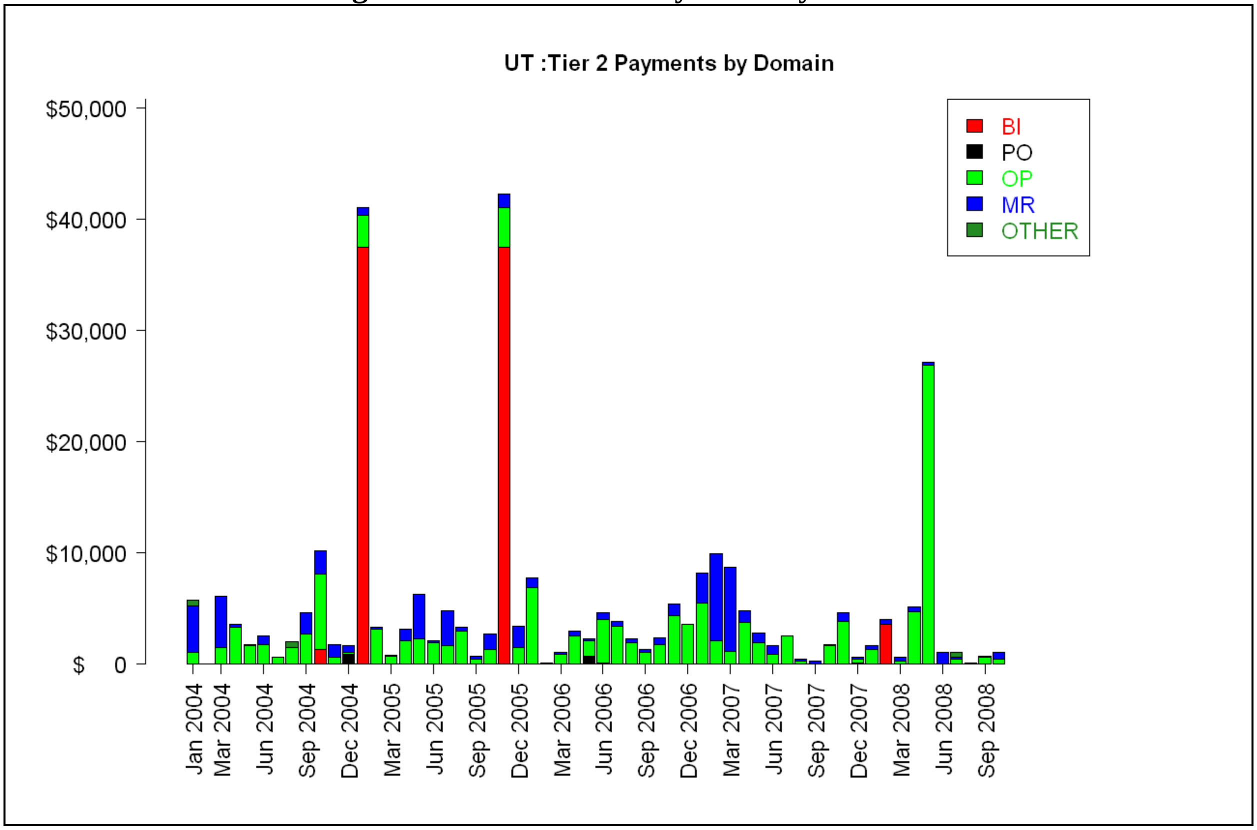
The next figure shows Utah Tier 1 payments by domain. Payments related to Billing are substantial throughout the first two years, while payments related to Maintenance & Repair and Provisioning are substantial throughout the Study Period.

Figure 47: Utah Tier 1 Payments by Domain



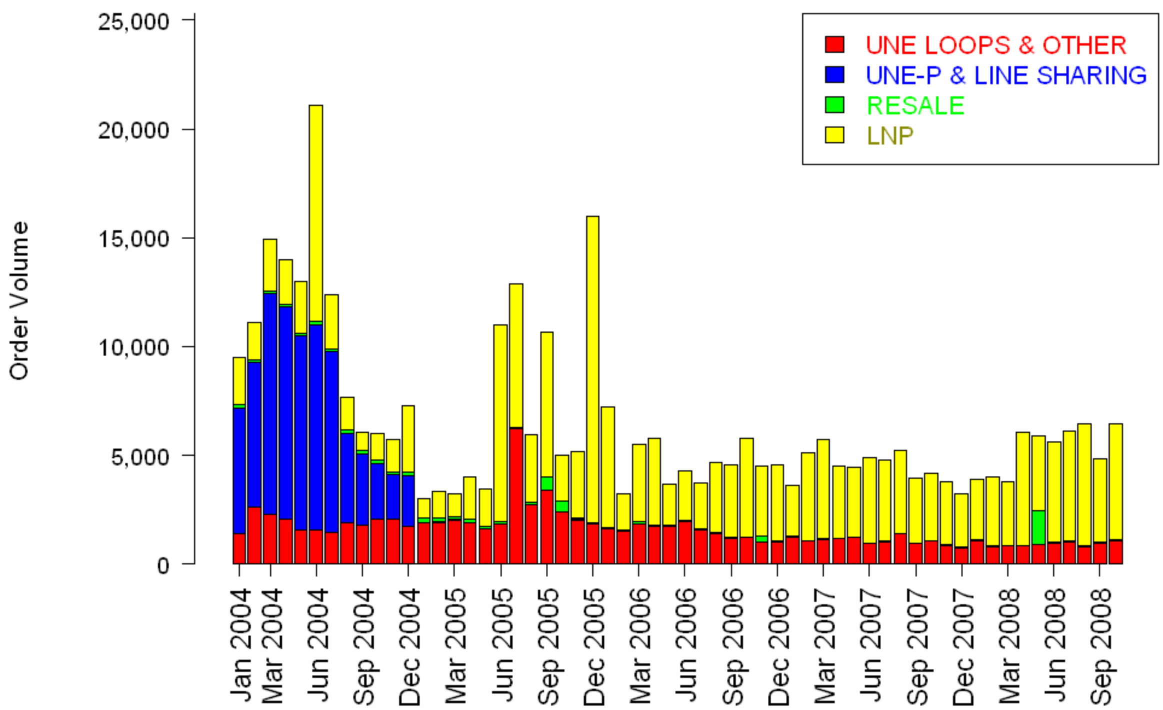
Tier 2 payments for Utah were dominated by MR measures, with OP measures occasionally responsible for a significant percentage of payments. In addition, two months had very substantial (more than $30,000) related to Billing. Overall Tier 2 payments have rarely been above $10,000. The figure below details Tier 2 payments for Utah by domain.

Figure 48: Utah Tier 2 Payments by Domain



As shown in Figure 49, Utah's overall monthly order volumes declined from their peaks in 2004, driven primarily by the TRO/TRRO decisions, which removed the requirement for Qwest to offer UNE-P and Line Sharing as unbundled network elements under Section 251 of the 1996 Telecommunications Act. After another set of peaks in 2005, Utah's order volume was relatively constant until April 2008, when a small increase in volumes occurred and has held through the end of the study in October 2008. Utah's Resale and UNE Loop order volumes have generally decreased over time and LNP orders have gradually increased.

Figure 49: Utah Ordering Volumes



As shown on Figure 50, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Since 2005, Utah's UNE-Loop and Resale line volumes have experienced a gradual decline over the Study Period.

Figure 50: Utah Lines in Service

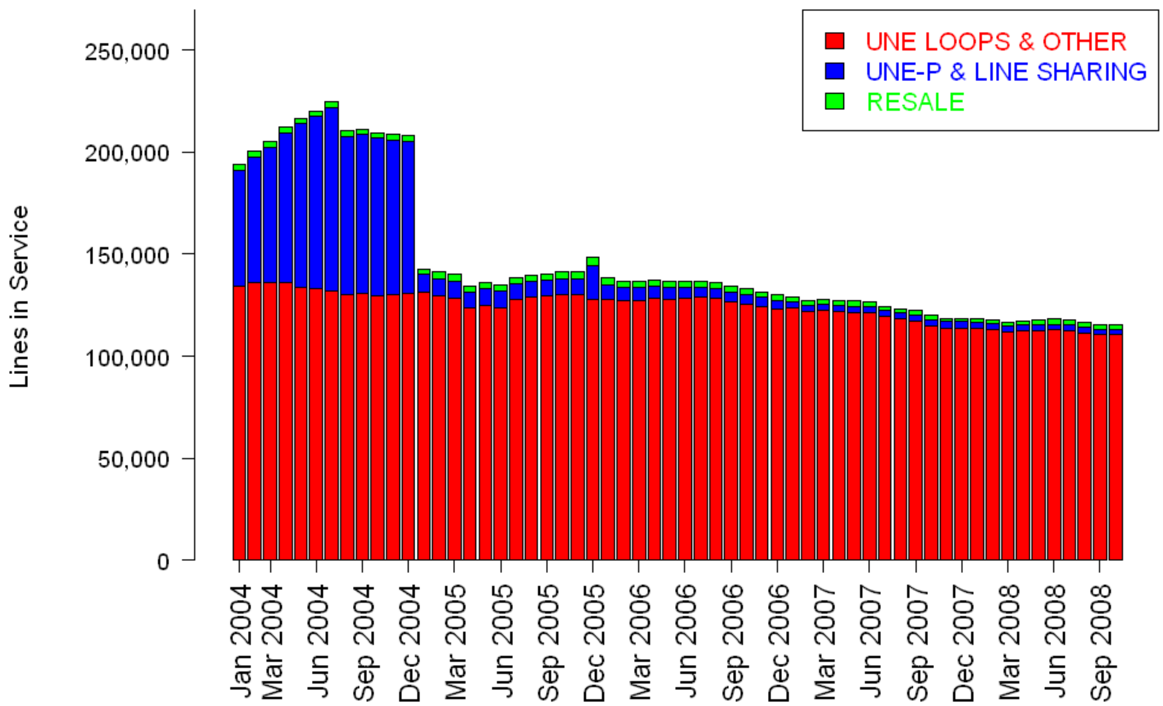


Table 19 shows the monthly CLEC aggregate order volumes for Utah from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. Orders for the UDIT-Above DS1 product exceeded ten per month only in July 2008. The monthly volumes for the other months were extremely low. The monthly volumes for the other products were always small.

Table 19
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Utah

Date	UBL-DS3Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	3	0	0	3	0
Feb 2007	0	0	0	0	0	0
Mar 2007	0	6	0	1	2	0
Apr 2007	0	2	0	0	5	0
May 2007	0	2	0	1	2	0
June 2007	1	2	0	0	3	0
July 2007	1	0	0	4	1	0
Aug 2007	1	8	0	0	1	0
Sep 2007	0	3	0	0	1	0
Oct 2007	0	4	0	6	1	0
Nov 2007	1	2	3	1	1	0
Dec 2007	0	2	0	0	0	0
Jan 2008	0	0	3	0	0	0
Feb 2008	0	2	1	0	0	0
Mar 2008	0	2	1	1	0	0
Apr 2008	3	4	0	0	2	0
May 2008	0	7	2	1	0	0
June 2008	0	6	0	0	2	0
July 2008	2	16	0	0	0	0
Aug 2008	1	2	0	0	0	0
Sep 2008	1	1	0	0	0	0
Oct 2008	0	2	0	0	0	0

Table 20 shows the monthly trouble report volumes in Utah for the five products that Liberty recommends for removal from the MR measures in the PAP. The monthly number of trouble reports never exceeded seven.

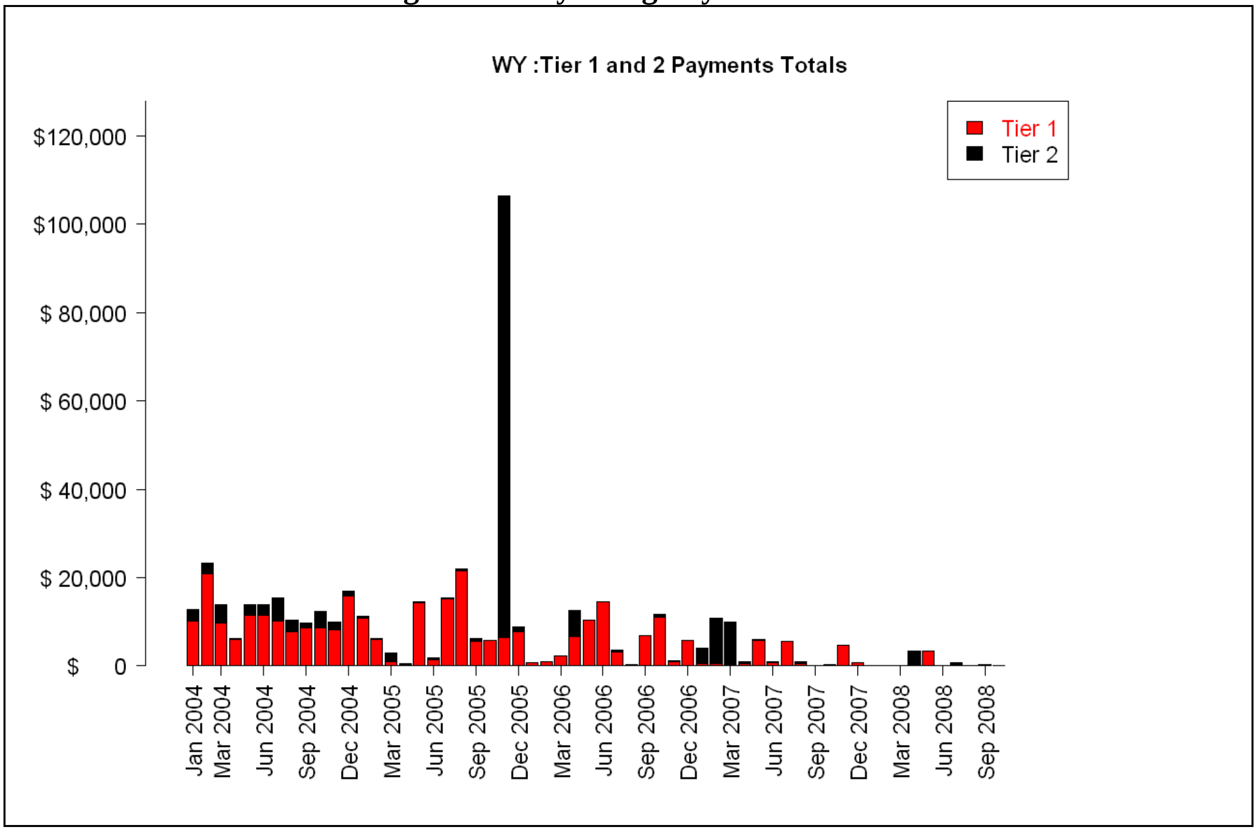
Table 20
Trouble Report Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Utah

Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	3	0	3	3
Feb 2007	0	3	0	6	0
Mar 2007	0	1	0	2	2
Apr 2007	0	3	0	4	1
May 2007	0	2	0	4	1
June 2007	0	3	0	4	0
July 2007	0	1	0	6	0
Aug 2007	0	2	0	3	3
Sep 2007	0	4	0	5	1
Oct 2007	0	3	0	3	1
Nov 2007	0	5	1	4	1
Dec 2007	0	2	0	3	3
Jan 2008	0	2	1	5	0
Feb 2008	0	2	0	7	3
Mar 2008	0	1	0	5	0
Apr 2008	0	2	0	3	1
May 2008	0	3	0	1	2
June 2008	0	6	0	2	4
July 2008	0	1	0	5	3
Aug 2008	0	2	0	1	2
Sep 2008	0	3	0	5	3
Oct 2008	0	3	1	1	1

K. Wyoming

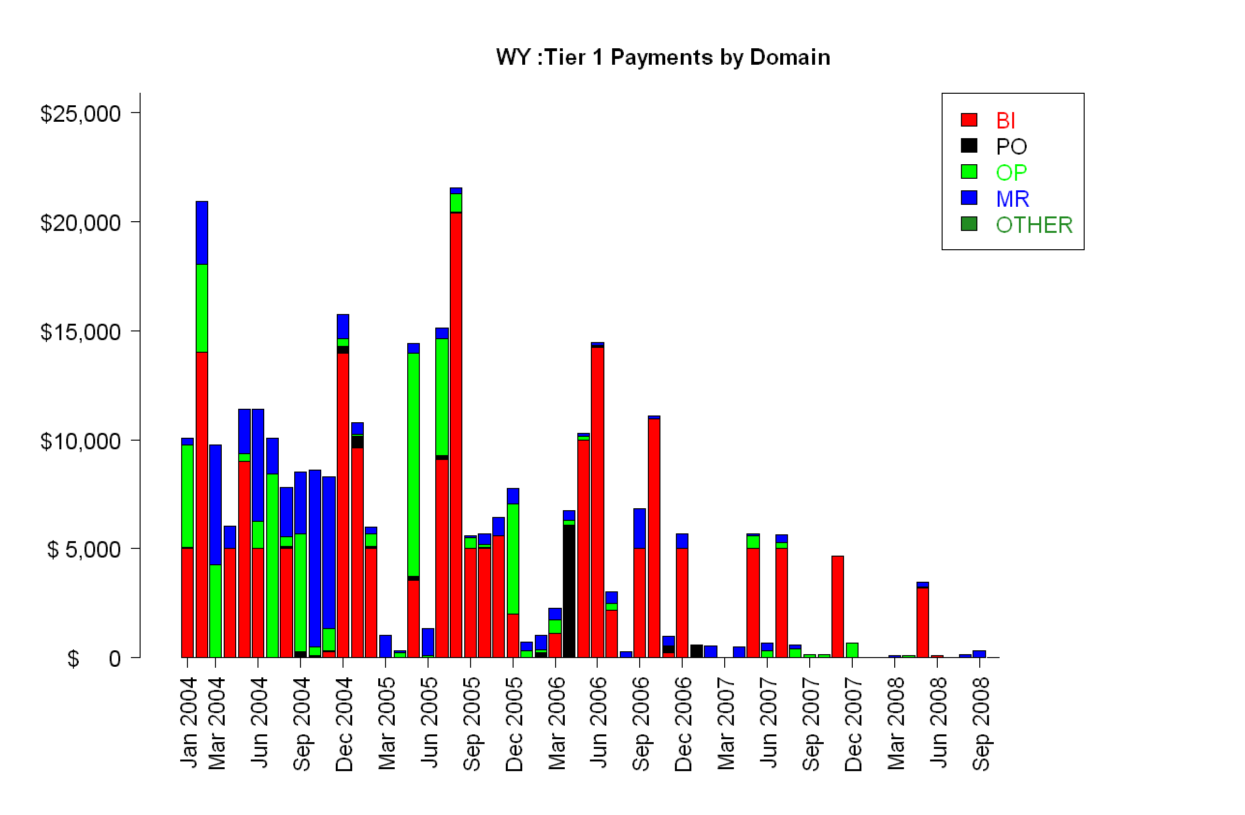
Wyoming's Tier 1 and Tier 2 payments were fairly steady except for one very large Tier 2 payment in November 2005. Typical payments were $10,000 in 2004 and early 2005 and are less than $5,000 now. The figure below shows total payments in Wyoming, with Tier 1 and Tier 2 shown in red and black, respectively.

Figure 51: Wyoming Payment Totals



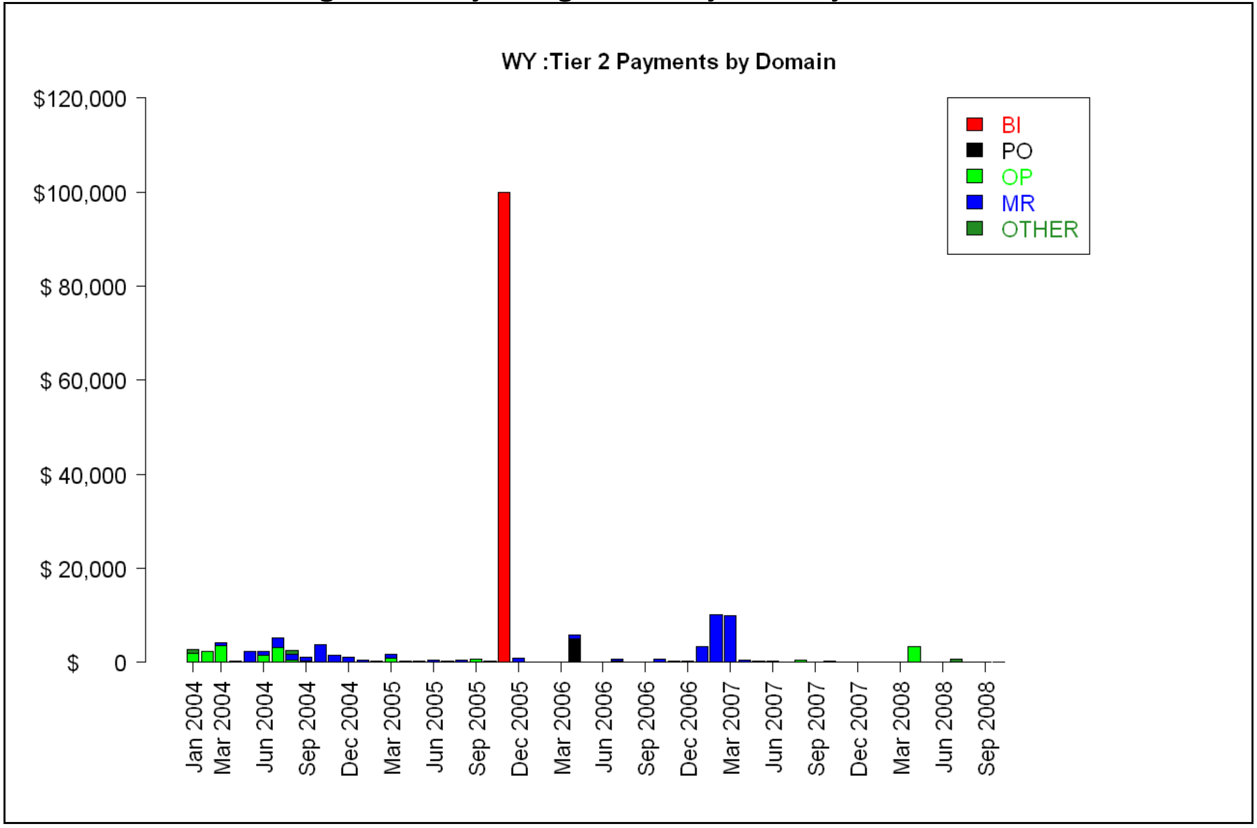
The next figure shows Wyoming Tier 1 payments by domain. Payments related to Billing are substantial throughout the Study Period, while payments related to Maintenance & Repair and Provisioning appear to drop off in the last two years.

Figure 52: Wyoming Tier 1 Payments by Domain



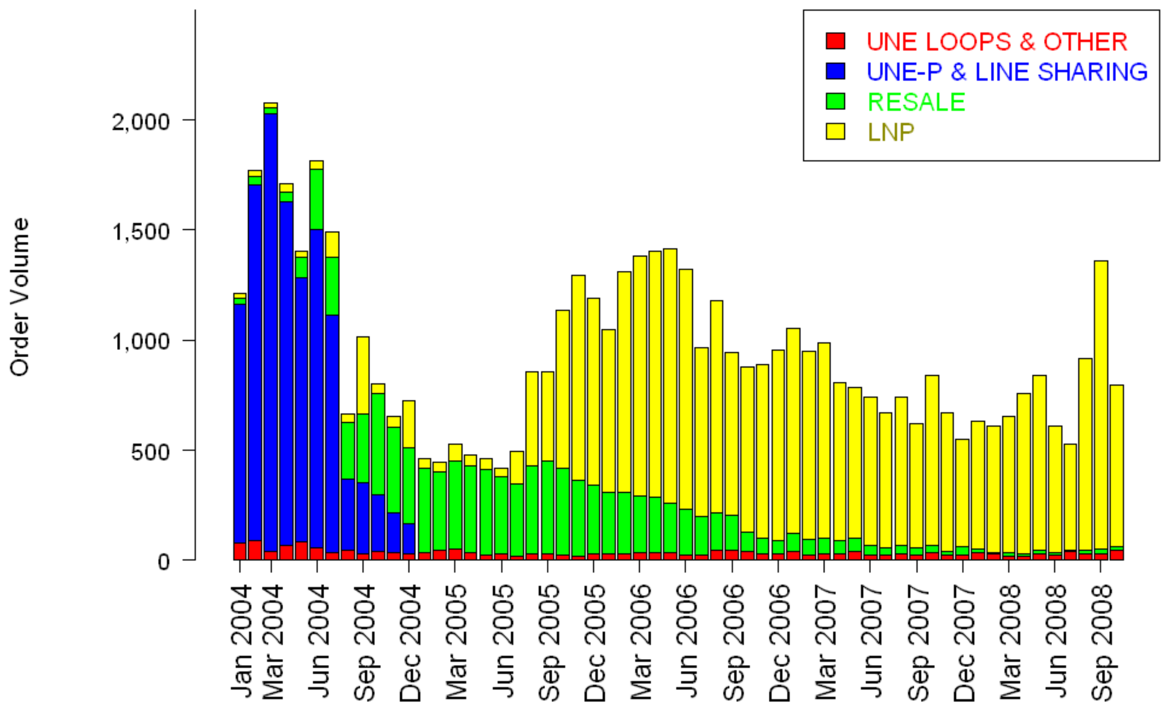
Tier 2 payments for Wyoming were dominated by MR and OP measures, with one very substantial ($100,000) Billing payment in November 2005. The figure below details Tier 2 payments for Wyoming by domain.

Figure 53: Wyoming Tier 2 Payments by Domain



Wyoming's overall monthly order volumes declined from their peaks in early 2004 through the middle of 2005 as shown in Figure 54. This decline was driven primarily by the TRO/TRRO decisions which no longer required Qwest to offer UNE-P and Line Sharing as UNEs under Section 251 of the 1996 Telecommunications Act. In mid-2005, Wyoming experienced an increase in its order volumes, driven by LNP orders. From mid-2005 until the end of the Study Period there has been a continuing decline in Resale order volumes. LNP volumes grew dramatically from mid-2005 to mid-2006, have remained fairly constant since then, and now dominate the Wyoming orders. UNE Loop orders, while never significant in Wyoming, have remained at relatively constant volume levels throughout the five year study.

Figure 54: Wyoming Ordering Volumes



As shown on Figure 55, UNE-P and Line Sharing lines in service fell off sharply after 2004, as a result of the TRO and TRRO decisions. Wyoming's UNE Loops have experienced a gradual increase in lines over the entire Study Period. Conversely, Wyoming's Resale line volumes have experienced declining line volumes.

Figure 55: Wyoming Line in Service

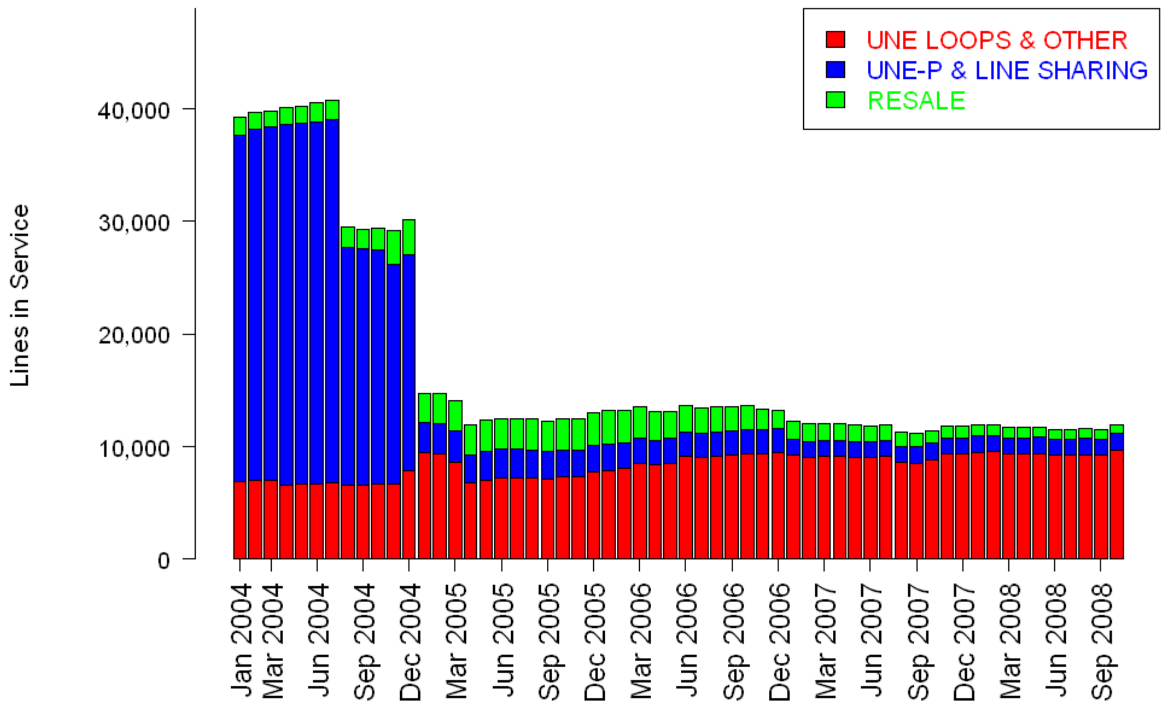


Table 21 shows the monthly CLEC aggregate order volumes for Wyoming from January 2007 through October 2008 for the six products Liberty recommends for removal from the OP measures in the PAP. The ordering volumes were always very small and never exceeded two in a month.

Table 21
Order Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Wyoming

Date	UBL-DS3Loop	UDIT – Above DS1	UBL 4W Non-Loaded Loop	Loops with Conditioning	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	0	2	0
Feb 2007	0	0	0	0	1	0
Mar 2007	0	0	0	0	1	0
Apr 2007	0	0	0	0	0	0
May 2007	0	0	0	2	0	0
June 2007	0	0	0	0	0	0
July 2007	0	0	0	0	1	0
Aug 2007	0	0	0	0	1	0
Sep 2007	0	0	0	0	1	0
Oct 2007	1	0	0	0	0	0
Nov 2007	0	0	0	0	0	0
Dec 2007	0	0	0	0	0	0
Jan 2008	0	0	0	0	1	0
Feb 2008	0	0	0	0	1	0
Mar 2008	0	0	0	0	0	0
Apr 2008	0	0	0	0	1	0
May 2008	0	0	0	0	2	0
June 2008	0	0	0	0	0	0
July 2008	0	1	0	0	1	0
Aug 2008	0	0	0	0	1	0
Sep 2008	0	0	0	0	0	0
Oct 2008	0	0	0	0	0	0

Table 22 shows the monthly trouble report volumes in Wyoming for the five products that Liberty recommends for removal from the MR measures in the PAP. The monthly number of trouble reports was always small and never exceeded four.

Table 22
Trouble Report Volumes for Products Recommended for PAP Removal
January 2007 through October 2008
Wyoming

Date	UBL-DS3	UDIT – Above DS1	UBL 4W Non-Loaded Loop	UBL – ISDN Capable Loop	Line Sharing
Jan 2007	0	0	0	0	0
Feb 2007	0	0	0	0	4
Mar 2007	0	0	0	1	0
Apr 2007	0	0	0	3	1
May 2007	0	0	0	0	1
June 2007	0	0	0	1	3
July 2007	0	1	0	0	1
Aug 2007	0	0	0	1	0
Sep 2007	0	0	0	0	0
Oct 2007	0	0	0	1	0
Nov 2007	0	0	0	0	2
Dec 2007	0	0	0	0	0
Jan 2008	0	0	0	1	0
Feb 2008	0	0	0	1	1
Mar 2008	0	0	0	1	1
Apr 2008	0	0	0	0	3
May 2008	0	0	0	2	2
June 2008	0	0	0	1	1
July 2008	0	0	0	0	3
Aug 2008	0	0	0	0	3
Sep 2008	0	0	0	0	1
Oct 2008	0	0	0	1	0

Appendix C: State-Specific Proposals

A. Arizona

The following lists the specific applicability of Liberty's recommendations to the Arizona PAP.

1. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-19 Stand Alone Test Environment (SATE) Accuracy
   - PO-20 Manual Service Order Accuracy
   - CP-1 Collocation Completion interval
   - CP-2 Collocations Completed within Scheduled Intervals
   - CP-4 Collocation Feasibility Study Commitments Met.

2. Add subsections to Section 6.0 "Tier-1 Payments to CLECs" and Section 8.0 "Step by Step Calculation of Monthly Tier-1 Parity Measurement Payments to CLECs" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[8]
   v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

3. In Section 7.4 and Table 6, replace GA-2: Gateway Availability – IMA-EDI with GA-8: Gateway Availability – IMA-XML, and adopt the language changes in PID version 9.1, which replaces EDI with XML for following PID measures: PO-1,

[8] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

PO-2, PO-3, PO-4, PO-5, PO-6, PO-7, PO-16, PO-19, and PO-20 (Liberty Recommendation 3).

4. Add language to Sections 15.0 (Audits/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

5. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating footnote e) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

6. Change footnote h of the table in Attachment 1 to add the following excluded products (Liberty Recommendation 4):

   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops (only for OR measures)
   - Line Sharing.

7. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

8. Adopt the following changes to the PID (Liberty Recommendation 5):

   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

B. Colorado

The following lists the specific applicability of Liberty's recommendations to the CPAP.

1. Restore the Tier 1B, Tier 1C, and Tier 2 components of the CPAP, which were eliminated in the most recent CPAP version, subject to the additional recommendations below (Liberty Recommendation 8).

2. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-20 Manual Service Order Accuracy
   - CP-1 Collocation Completion interval.

3. Add subsections to Section 6.0 "Tier 1A Parity Calculations" and Section 7.0 "Tier 1 Calculation of Payments to CLEC for Tier 1A, 1B, and 1C Submeasures" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[9]
   v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

4. Add language to Sections 14.0 (Audits of Performance Results) and 18.0 (Effective Date, Reviews and Termination) to provide for necessary funding of activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

[9] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

5. Change Appendices A and B to replace OP-5a, b with OP-5T (eliminating footnote e) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

6. Change Appendix B to add the following excluded products for OP and MR measures (Liberty Recommendation 4):
   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops (only for OR measures).

7. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

8. Adopt the following changes to the PID (Liberty Recommendation 5):
   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

C. Idaho

The following lists the specific applicability of Liberty's recommendations to the Idaho PAP.

1. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-20 Manual Service Order Accuracy
   - CP-2 Collocations Completed within Scheduled Intervals
   - CP-4 Collocation Feasibility Study Commitments Met.

2. Add subsections to Section 6.0 "Tier 1 Payments to CLEC" and Section 8.0 "Step by Step Calculation of Monthly Tier 1 Payments to CLEC" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[10]
   v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

3. In Section 7.4 and Table 6, replace GA-2: Gateway Availability – IMA-EDI with GA-8: Gateway Availability – IMA-XML, and adopt the language changes in PID version 9.1, which replaces EDI with XML for following PID measures: PO-1, PO-2, PO-3, PO-4, PO-5, PO-6, PO-7, PO-16, PO-19, and PO-20 (Liberty Recommendation 3).

4. Add language to Sections 15.0 (Integrated Audit Program/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

[10] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

5. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating footnote d) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

6. Change footnote g of the table in Attachment 1 to add the following excluded products (Liberty Recommendation 4):
   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops
   - Line Sharing.

7. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

8. Adopt the following changes to the PID (Liberty Recommendation 5):
   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

D. Iowa

The following lists the specific applicability of Liberty's recommendations to the Iowa PAP.

1. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-20 Manual Service Order Accuracy
   - CP-2 Collocations Completed within Scheduled Intervals
   - CP-4 Collocation Feasibility Study Commitments Met.

2. Add subsections to Section 6.0 "Tier 1 Payments to CLEC" and Section 8.0 "Step by Step Calculation of Monthly Tier 1 Payments to CLEC" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[11]
   v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

3. In Section 7.4 and Table 6, replace GA-2: Gateway Availability – IMA-EDI with GA-8: Gateway Availability – IMA-XML, and adopt the language changes in PID version 9.1, which replaces EDI with XML for following PID measures: PO-1, PO-2, PO-3, PO-4, PO-5, PO-6, PO-7, PO-16, PO-19, and PO-20 (Liberty Recommendation 3).

4. Add language to Sections 15.0 (Integrated Audit Program/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

[11] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

5. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating footnote d) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

6. Change footnote g of the table in Attachment 1 to add the following excluded products (Liberty Recommendation 4):
   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops
   - Line Sharing.

7. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

8. Adopt the following changes to the PID (Liberty Recommendation 5):
   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

E. Montana

The following lists the specific applicability of Liberty's recommendations to the Montana PAP.

1. Adopt the recommendations of the 2007 Stipulation (Liberty Recommendation 10). The remaining Liberty recommendations assume these recommendations have been adopted.

2. Modify Section 3.2 (added as one of the 2007 Stipulation recommendations) to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-20 Manual Service Order Accuracy
   - CP-2 Collocations Completed within Scheduled Intervals
   - CP-4 Collocation Feasibility Study Commitments Met.

3. Add subsections to Section 6.0 "Tier 1 Payments to CLEC" and Section 8.0 "Step by Step Calculation of Monthly Tier 1 Payments to CLEC" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[12]
   v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

4. In Section 7.4 and Table 6, replace GA-2: Gateway Availability – IMA-EDI with GA-8: Gateway Availability – IMA-XML, and adopt the language changes in PID version 9.1, which replaces EDI with XML for following PID measures: PO-1, PO-2, PO-3, PO-4, PO-5, PO-6, PO-7, PO-16, PO-19, and PO-20 (Liberty Recommendation 3).

[12] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

5. Add language to Sections 15.0 (Integrated Audit Program/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

6. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating current footnote e) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

7. Change the footnote to be added to the table in Attachment 1 as part of the 2007 Stipulation recommendation that lists low-volume excluded products to include the following additional excluded products (Liberty Recommendation 4):

   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops
   - Line Sharing.

8. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

9. Adopt the following changes to the PID (Liberty Recommendation 5):
   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

F. Nebraska

The following lists the specific applicability of Liberty's recommendations to the Nebraska PAP.

1. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-20 Manual Service Order Accuracy
   - CP-2 Collocations Completed within Scheduled Intervals
   - CP-4 Collocation Feasibility Study Commitments Met.

2. Add subsections to Section 6.0 "Tier 1 Payments to CLEC" and Section 8.0 "Step by Step Calculation of Monthly Tier 1 Payments to CLEC" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[13]
   v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

3. In Section 7.4 and Table 6, replace GA-2: Gateway Availability – IMA-EDI with GA-8: Gateway Availability – IMA-XML, and adopt the language changes in PID version 9.1, which replaces EDI with XML for following PID measures: PO-1, PO-2, PO-3, PO-4, PO-5, PO-6, PO-7, PO-16, PO-19, and PO-20 (Liberty Recommendation 3).

4. Add language to Sections 15.0 (Integrated Audit Program/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

[13] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

5. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating footnote d) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

6. Change footnote g of the table in Attachment 1 to add the following excluded products (Liberty Recommendation 4):
   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops
   - Line Sharing.

7. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

8. Adopt the following changes to the PID (Liberty Recommendation 5):
   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

G. New Mexico

The following lists the specific applicability of Liberty's recommendations to the New Mexico PAP.

1. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-19a Stand Alone Test Environment (SATE) Accuracy
   - PO-20 Manual Service Order Accuracy
   - CP-2 Collocations Completed within Scheduled Intervals
   - CP-4 Collocation Feasibility Study Commitments Met.

2. Add subsections to Section 6.0 "Tier 1 Payments to CLEC" and Section 8.0 "Step by Step Calculation of Monthly Tier 1 Payments to CLEC" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[14]
   v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

3. In Section 7.4 and Table 6, replace GA-2: Gateway Availability – IMA-EDI with GA-8: Gateway Availability – IMA-XML, and adopt the language changes in PID version 9.1, which replaces EDI with XML for following PID measures: PO-1, PO-2, PO-3, PO-4, PO-5, PO-6, PO-7, PO-16, PO-19, and PO-20 (Liberty Recommendation 3).

4. Add language to Sections 15.0 (Integrated Audit Program/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of

[14] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

5. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating footnote d) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

6. Change footnote g of the table in Attachment 1 to add the following excluded products (Liberty Recommendation 4):
   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops
   - Line Sharing.

7. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

8. Adopt the following changes to the PID (Liberty Recommendation 5):
   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

H. North Dakota

The following lists the specific applicability of Liberty's recommendations to the North Dakota PAP.

1. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-20 Manual Service Order Accuracy
   - CP-2 Collocations Completed within Scheduled Intervals
   - CP-4 Collocation Feasibility Study Commitments Met.

2. Add subsections to Section 6.0 "Tier 1 Payments to CLEC" and Section 8.0 "Step by Step Calculation of Monthly Tier 1 Payments to CLEC" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   - i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   - ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   - iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   - iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[15]
   - v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

3. In Section 7.4 and Table 6, replace GA-2: Gateway Availability – IMA-EDI with GA-8: Gateway Availability – IMA-XML, and adopt the language changes in PID version 9.1, which replaces EDI with XML for following PID measures: PO-1, PO-2, PO-3, PO-4, PO-5, PO-6, PO-7, PO-16, PO-19, and PO-20 (Liberty Recommendation 3).

4. Add language to Sections 15.0 (Integrated Audit Program/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of

[15] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

5. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating footnote d) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

6. Change footnote g of the table in Attachment 1 to add the following excluded products (Liberty Recommendation 4):

   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops
   - Line Sharing.

7. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

8. Adopt the following changes to the PID (Liberty Recommendation 5):
   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

I. South Dakota

The following lists the specific applicability of Liberty's recommendations to the South Dakota PAP.

1. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-20 Manual Service Order Accuracy
   - CP-2 Collocations Completed within Scheduled Intervals
   - CP-4 Collocation Feasibility Study Commitments Met.

2. Add subsections to Section 6.0 "Tier 1 Payments to CLEC" and Section 8.0 "Step by Step Calculation of Monthly Tier 1 Payments to CLEC" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[16]
   v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

3. In Section 7.4 and Table 6, replace GA-2: Gateway Availability – IMA-EDI with GA-8: Gateway Availability – IMA-XML, and adopt the language changes in PID version 9.1, which replaces EDI with XML for following PID measures: PO-1, PO-2, PO-3, PO-4, PO-5, PO-6, PO-7, PO-16, PO-19, and PO-20 (Liberty Recommendation 3).

4. Add language to Sections 15.0 (Integrated Audit Program/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of

[16] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

5. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating footnote d) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

6. Change footnote g of the table in Attachment 1 to add the following excluded products (Liberty Recommendation 4):
   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops
   - Line Sharing.

7. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

8. Adopt the following changes to the PID (Liberty Recommendation 5):
   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

J. Utah

The following lists the specific applicability of Liberty's recommendations to the Utah PAP.

1. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
    - PO-9 Timely Jeopardy Notices
    - PO-20 Manual Service Order Accuracy
    - CP-2 Collocations Completed within Scheduled Intervals
    - CP-4 Collocation Feasibility Study Commitments Met.

2. Add subsections to Section 6.0 "Tier 1 Payments to CLEC" and Section 8.0 "Step by Step Calculation of Monthly Tier 1 Payments to CLEC" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
    i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
    ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
    iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
    iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[17]
    v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

3. Add language to Sections15.0 (Integrated Audit Program/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

4. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating footnote e) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

[17] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

5. Change footnote h of the table in Attachment 1 to add the following excluded products (Liberty Recommendation 4):
   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops
   - Line Sharing.

6. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

7. Adopt the following changes to the PID (Liberty Recommendation 5):
   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

K. Wyoming

The following lists the specific applicability of Liberty's recommendations to the Wyoming PAP.

1. Modify Section 3.2 to add the following PID measures to the Reinstatement/Removal List (Liberty Recommendation 2):
   - PO-9 Timely Jeopardy Notices
   - PO-20 Manual Service Order Accuracy
   - CP-2 Collocations Completed within Scheduled Intervals
   - CP-4 Collocation Feasibility Study Commitments Met.

2. Add subsections to Section 6.0 "Tier 1 Payments to CLEC" and Section 8.0 "Step by Step Calculation of Monthly Tier 1 Payments to CLEC" to describe a new aggregation mechanism for small sample sizes (Liberty Recommendation 1):
   i. Aggregate transactions for all CLECs that have less than ten transactions in a month for any given sub-measure disaggregation before determining whether a payment is due.
   ii. If the outcome of this CLEC aggregation equals or exceeds ten transactions, use the aggregate result for these CLECs to calculate whether penalty payments are required.
   iii. Should the calculation determine that Qwest was out of compliance with the standard for the sub-measure, payments will be made to the aggregated CLECs based on each CLEC's relative share of the total number of misses.
   iv. If the aggregate total does not exceed ten transactions, then carry forward the aggregate result to the following two months until either the threshold of ten aggregate transactions is met or three months of results data have been used in an attempt to meet the minimum volume threshold.[18]
   v. When either of these criteria has been met, the process starts again the following month for that sub-measure.

3. In Section 7.4 and Table 6, replace GA-2: Gateway Availability – IMA-EDI with GA-8: Gateway Availability – IMA-XML, and adopt the language changes in PID version 9.1, which replaces EDI with XML for following PID measures: PO-1, PO-2, PO-3, PO-4, PO-5, PO-6, PO-7, PO-16, PO-19, and PO-20 (Liberty Recommendation 3).

4. Add language to Sections15.0 (Integrated Audit Program/Investigations of Performance Results) and 16.0 (Reviews) to provide for necessary funding of

[18] Liberty recommends treating aggregation across months as if it were a single month for payment escalation purposes.

activities through a direct assessment of Qwest if the Tier 2 funds are exhausted (Liberty Recommendation 6).

5. Change the table in Attachment 1 to replace OP-5a, b with OP-5T (eliminating footnote d) and change the PID to make OP-5T no longer diagnostic but a parity measure with the same retail analogue as OP-5a (Liberty Recommendation 3).

6. Change footnote g of the table in Attachment 1 to add the following excluded products (Liberty Recommendation 4):

   - Unbundled Digital Signaling Level 3 (DS-3) Loops
   - Unbundled Dedicated Interoffice Transport (UDIT) – Above DS1
   - Unbundled 4-Wire Non-Loaded Loops
   - Loops with Conditioning (applies only to OR measures)
   - Unbundled ISDN Capable Loops
   - Line Sharing.

7. Adopt changes to the PID to replace "retail Integrated Services Digital Network Basic Rate Interface (ISDN-BRI) designed" with other retail products or with a benchmark, after collaborative discussions determine the appropriate alternatives (Liberty Recommendation 3).

8. Adopt the following changes to the PID (Liberty Recommendation 5):

   - Limit MR-4 (All Troubles Cleared within 48 Hours) to service-affecting troubles
   - Add a diagnostic sub-measure to OP-4 (Installation Interval) to measure performance on expedited orders
   - Add a diagnostic sub-measure to MR-7 (Installation Interval) to measure chronic troubles
   - Add a diagnostic sub-measure to OP-3 (Installation Appointments Met) to measure the percentage of coordinated appointments met.

Appendix D: Glossary of Acronyms

ADSL	Asynchronous Digital Subscriber Line
ARMIS	Automated Reporting Management Information System
ASR	access service request
CLEC	competitive local exchange carrier
CPAP	Colorado Performance Assurance Plan
DS0	Digital Signaling Level 0
DS1	Digital Signaling Level 1
DS3	Digital Signaling Level 3
DSL	Digital Subscriber Line
EB-TA	Electronic Bonding-Trouble Administration
EDI	Electronic Data Interchange
EEL	Enhanced Extended Link
EXACT	Exchange Access Control & Tracking
FCC	Federal Communications Commission
FOC	firm order confirmation
ILEC	Incumbent Local Exchange Carrier
IMA	Interconnect Mediated Access
IMA-EDI	Interconnect Mediated Access-Electronic Data Interchange
IMA-XML	Interconnect Mediated Access-eXtensible Markup Language
ISDN	Integrated Services Digital Network
ISDN BRI	Integrated Services Digital Network Basic Rate Interface
ISDN PRI	Integrated Services Digital Network Primary Rate Interface
LIS	Local Interconnection Service
LNP	local number portability
LSR	local service request
MLT	mechanized loop test
NTF	No Trouble Found
NXX	telephone number prefix ("exchange")
PAP	Performance Assurance Plan
PBX	Private Branch eXchange
PID	Performance Indicator Definitions
POTS	plain old telephone service
QLSP	Qwest Local Services Platform
QPAP	Qwest Performance Assurance Plan
QPP	Qwest Platform Plus

ROC	Regional Operating Committee
SATE	Stand Alone Test Environment
SGAT	Statement of Generally Available Terms and Conditions
TOK	Test Okay
TRO	Triennial Review Order
TRRO	Triennial Review Remand Order
UDIT	Unbundled Dedicated Interoffice Transport
UNE	Unbundled Network Element
UNE-P	Unbundled Network Element – Platform
XML	Extensible Mark-up Language