QWEST CORPORATION’S
COMPARABLY EFFICIENT INTERCONNECTION PLAN
FOR ENHANCED PROTOCOL PROCESSING SERVICES

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I. INTRODUCTION

Pursuant to the Remand Report and Order released March 10, 1999 in the Computer III Further Remand Proceeding, Qwest hereby amends its CEI Plan and posts it to Qwest’s Internet web site.¹ This CEI Plan for Enhanced Protocol Processing Services describes the manner in which Qwest offers the basic services used with its enhanced protocol processing services to competitive enhanced service providers (“ESP”) and end users on equal terms and conditions.² This CEI Plan describes the nature of the enhanced services that fit within the category of enhanced protocol processing services and the basic services used in conjunction with these services. It also specifies the manner in which Qwest complies with the four “comparably efficient interconnection parameters” established by the Commission in Phase II of the Computer III docket.³


² The Federal Communications Commission (“Commission”) stated that “a single CEI plan could cover a family of protocol processing applications.” In the Matters of Amendment to Sections 64.702 of the Commission’s Rules and Regulations (Third Computer Inquiry); and Policy and Rules Concerning Rates for Competitive Common Phase II Carrier Service and Facilities Authorizations Thereof; Communications Protocols under Sections 64.702 of the Commission’s Rules and Regulations, Report and Order, 2 FCC Rcd. 3072, 3111 n.19 (1987) (“Phase II Order”), modified on recon., 3 FCC Rcd. 1150 (1988) (“Phase II Reconsideration Order”). Accordingly, this CEI Plan covers the family of synchronous protocol conversion services, as well as conversions between synchronous protocols and asynchronous protocols.

³ With respect to protocol processing, the Commission chose to “apply the general CEI/ONA principles of the Phase I Order ...[but to] modify the CEI/ONA requirement for protocol processing, since a literal application of these requirements would be inefficient for the carriers and would not provide meaningful equal access for competitors.” Phase II Order, 2 FCC Rcd. at 3078 ¶¶ 43-44. Accordingly, the Commission has set forth four CEI requirements for protocol processing, as opposed to the nine CEI parameters for other enhanced services. Compare Phase II Reconsideration Order, 3 FCC Rcd. at 1154-55 ¶¶ 28-34, with In the Matters of: Amendment of Sections 64.702 of the Commission’s Rules and Regulations (Third Computer Inquiry); and Policy and Rules Concerning Rates for Competitive Common
II. DESCRIPTION OF ENHANCED SERVICES COVERED BY CEI PLAN

Qwest’s enhanced protocol processing services allow customers to use Qwest’s network access services to transport data originated from customer premises equipment (“CPE”), including computers, even though the CPE may employ different communications protocols. Protocol processing subsumes “protocol conversion” and refers to the use of computers to interpret and react to the protocol symbols as the information contained in a subscriber’s message is routed to its destination. The actual protocol conversion is accomplished in an access concentrator, a packet switch, a server, or a dedicated network multiplexer. The instant plan does not cover asynchronous/X.25 and asynchronous/X.75 conversions to the extent Qwest is already permitted to collocate the equipment for those services in its central offices.  

III. COMPLIANCE WITH CEI PARAMETERS

There are four CEI requirements that must be met as part of a CEI Plan for Enhanced Protocol Processing Services. These four requirements are:

1) that transmission costs for competing protocol conversion providers be minimized;

2) that unbundled access be afforded to end users to the protocol conversion capabilities of the underlying carrier and those of others through tariffed services;

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5 See Phase II Reconsideration Order, 3 FCC Rcd. at 1155 ¶¶ 32-34.
3) that interoffice channels be taken at tariffed rates by both the carrier and competing ESPs; and

4) that the CEI pricing requirements imposed in the Phase I Orders be applied.

A. Minimization of Transport Costs

This requirement obligates a carrier to provide others with interconnection facilities that minimize transport costs associated with integrating enhanced services facilities with basic network facilities. As explained in the Phase II Reconsideration Order, this requirement was designed to reduce transmission cost differences between collocated Bell Operating Company ("BOC") enhanced service operations and non-collocated ESPs.\(^6\) The Commission stated that "a carrier may satisfy this CEI/ONA requirement if it charges itself an access link rate that is the same as that paid by non-collocated enhanced service providers, provided that the access connections in each case are equivalent in technical quality."\(^7\) The Commission further stated: "When such differences do not exist, no action is required to further minimize transmission costs."\(^8\)

Qwest’s enhanced protocol processing services operations obtain basic services from existing tariffs, price lists or catalogs and are, therefore, purchasing access connections at the same rates as are available to unaffiliated ESPs.\(^9\)

\(^6\) See id.

\(^7\) See id. at 1155 ¶ 34. See also In the Matter of Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order, 4 FCC Rcd. 1, 78 ¶ 151 (1988) ("ONA Order").


\(^9\) See Phase I Reconsideration Order, 2 FCC Rcd. at 3048 ¶ 92.
B. **Unbundled End-User Access**

The Commission requires that unbundled access be afforded to end users to the protocol conversion capabilities of the underlying carrier and those of others through tariffed services. End users access the enhanced protocol processing services described herein, and enhanced protocol processing services of competitive ESPs through existing standard network interfaces. Customers may reach the service through tariffed analog or digital private lines or through tariffed DS1 circuits. Dial access to the services will be made through tariffed business lines. No interface, signaling, abbreviated dialing, derived channels or other unique capabilities will be provided to access Qwest’s enhanced protocol processing services which are not available to the public in tariffed form or through published price lists or catalogs. If such access arrangements are to be made available to Qwest’s enhanced protocol processing services, they will be made available to Qwest’s enhanced service competitors at the same time, in the same jurisdictions and on the same terms and conditions. Qwest will also abide by prior commitments as to advance notification to competing ESPs of new interfaces, and the prior notification (including “make/buy” disclosure) required by the network disclosure rules.\(^\text{10}\)

C. **Interoffice Channels Taken at Tariffed Rates**

This parameter requires that the basic services and basic service functions that underlie the carrier’s enhanced service offering must be unbundled from other basic service offerings and associated with a specific rate element in the tariff. In the case of protocol processing, the Commission specifically requires that the underlying interoffice channels be taken at tariffed rates.\(^\text{11}\) Information used by a carrier in providing the unbundled basic service that is not Customer Proprietary Network Information must be made available. The unbundled offerings

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\(^{10}\) See 47 C.F.R. § 51.331.
must also include any options or functions available to the carrier. All basic network capabilities used by the carrier’s enhanced service offerings, including signaling, switching, billing and network management, are subject to the unbundling requirement.

The basic services that may be used in conjunction with Qwest’s enhanced protocol processing services, including interoffice channels, are currently available on an unbundled basis from federal and/or state tariffs, price lists or catalogs. Before Qwest utilizes any new basic services in jurisdictions beyond those indicated in existing network disclosures, Qwest will notify the industry.

Tariffs for the basic services may be viewed on Qwest’s Internet web site http://tariffs.qwest.com:8000/Q_Tariffs/index.htm. Qwest states include Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington and Wyoming.

D. CEI Pricing Requirements

This obligates a carrier’s enhanced service operations to take the basic services used in its enhanced service offerings at their unbundled tariffed rates. Qwest’s enhanced protocol processing services operations pay the same tariffed or price-listed rates for all underlying basic services as are paid by competing ESPs.

IV. OTHER NONSTRUCTURAL SAFEGUARDS

A. Allocation of Joint and Common Costs

In the Verizon/Qwest Cost Forbearance Order the Commission granted Qwest relief from certain cost assignment rules. On December 31, 2008 the Wireline Competition Bureau

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11 See Phase II Order, 2 FCC Rcd. at 3079-80 ¶¶ 49-56, 3080-81 ¶ 62; Phase II Reconsideration Order, 3 FCC Rcd. at 1154 ¶ 28; Memorandum Opinion and Order, 100 FCC 2d at 1091 ¶ 86, 1094-95 ¶ 94.

12 In the Matter of Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering; Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the
approved Qwest’s compliance plan which described in detail how Qwest would fulfill its statutory and regulatory obligations. Qwest will comply with all commitments contained in its compliance plan.

B. Nondiscrimination Reporting

Qwest tracks promised installation dates met and maintenance time intervals for basic services provided to Qwest’s enhanced protocol processing services operations and for those provided to other ESPs via field identifier codes in the service order process.

Based on the Commission’s Report and Order, nondiscrimination reports are prepared and filed quarterly.¹³ These reports are aggregated with other Qwest services offered pursuant to CEI plans, and a single companion report filed for all such services.

C. Disclosure of Network Information

Pursuant to Section 251(c)(5), the Commission adopted rules requiring incumbent local exchange carriers (“ILEC”) to give competing service providers complete information about network design, technical standards, and planned changes to the network.¹⁴ In its rules, the Commission said that an ILEC may provide the required public notice of network changes by filing a public notice with the Commission or by providing public notice through industry fora, industry publications, or the ILEC’s Internet site.¹⁵ The Commission concluded that the

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¹³ See Report and Order, 104 FCC 2d at 1055-6 ¶ 192.
¹⁴ See 47 C.F.R. § 51.325.
¹⁵ See 47 C.F.R. § 51.329.
disclosure standard upon which the rules under Section 251(c)(5) are based was consistent with the scope of the Computer III disclosure requirements.\textsuperscript{16}

All interfaces offered by Qwest have been disclosed pursuant to the Commission’s network disclosure rules.\textsuperscript{17}

V. DEREGULATED OR DETARIFFED BASIC SERVICES

Several Qwest jurisdictions may have detariffed some of the basic services utilized by Qwest enhanced protocol processing services as described herein. In no Qwest jurisdiction is any basic service completely deregulated. In those jurisdictions where any of the basic services utilized to provide Qwest enhanced protocol processing services have been detariffed, the basic services are available on a nondiscriminatory basis, pursuant to a publicly available price list that will be published at reasonable times prior to implementation of the basic service in question. Of course, in jurisdictions where detarifffing of other basic services has been accomplished, similar public notices of such new basic services will likewise be accomplished. Tariffs and price lists for these basic services may be viewed on Qwest’s Internet web site \texttt{http://tariffs.qwest.com:8000/Q_Tariffs/index.htm}.

VI. CONCLUSION

Qwest has demonstrated herein that its currently offered enhanced protocol processing services comply with all Commission-mandated CEI requirements and serve the public interest. Barring further action by the Commission, Qwest will continue to offer its enhanced protocol processing services pursuant to the terms and conditions described herein.

\textsuperscript{16} See \textit{Remand Report and Order}, 14 FCC Rcd. 4289.

\textsuperscript{17} See 47 C.F.R. § 51.325, \textit{et seq}. 