



BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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Chairman

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JAMES M. IRVIN

Commissioner

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AZ CORP COMMISSION
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Commissioner

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271
OF THE TELECOMMUNICATIONS
ACT OF 1996

DOCKET NO. T-00000B-97-0238
ELI'S OSS POSITION
STATEMENT RE: OSS MASTER
PLAN

Electric Lightwave, Inc. submits the following comments to the proposed Master Plan for OSS testing. ELI submits these comments for discussions purposes and to facilitate the OSS workshop process. ELI reserves any and all rights to raise additional issues as appropriate.

The proposed "Master Plan" protesting U S WEST's Operation Support Systems in Arizona specifies, at a high level, the test phases, test philosophy, responsibilities and general guidelines for testing U S WEST's OSS for interconnection. ELI believes the Master Plan provides an excellent starting point for discussion in drafting of detailed test plans. Even so, ELI believes further discussion between the parties is necessary to resolve various outstanding issues and concerns.

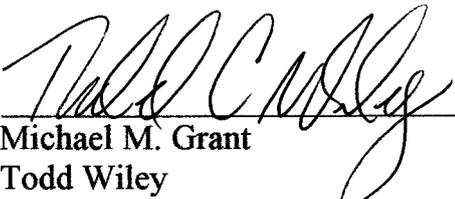
The third party organization that will be given responsibility for finalizing test plans and conducting the majority of the testing must be selected carefully. The third party tester should be capable, experienced, competent and reputable on these types of OSS issues. ELI believes selection of the third party tester

1 is one of the most important steps in the OSS testing process. Staff should require the
2 third party tester to have previous experience in OSS testing. The third party tester
3 also should be allowed to render a completely independent and objective analysis. ELI
4 hopes the third party tester would act like an independent and impartial quality
5 assurance organization. Also, ELI believes the third party tester should be empowered
6 to "stop the line" and send the OSS back to U S WEST for necessary changes and
7 modifications.
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10 Of course, the test plans and implementation should be done in a
11 thorough and professional manner. Staff must not allow or tolerate any shortcuts in
12 the testing process. On that issue, care should be taken to cover all the test areas
13 prescribed by the Master Plan. Full re-testing should be conducted for tests which
14 have failed along with any areas which might be effected by software changes and
15 fixes. The OSS test plan must be expanded to cover adequate detail at each point in
16 the testing process. Test scripts must be written for individual tests. A detailed testing
17 methodology should be developed and agreed on before testing begins. Finally, test
18 results should be thoroughly recorded and documented.
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21 RESPECTFULLY SUBMITTED this 17 day of September, 1999.

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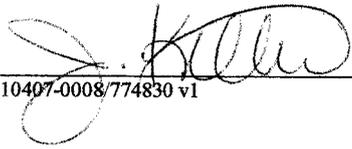
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