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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION ARIZONA CORPORATION COMMISSION  
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SEP 17 1999

DOCKETED BY [Signature] T-00000A-97-0238

IN THE MATTER OF U S WEST )  
COMMUNICATION, INC.'S COMPLIANCE )  
WITH SECTION 271 OF THE TELE- )  
COMMUNICATIONS ACT OF 1996 )

DOCKET NO. T-00000A-97-0238  
NOTICE OF FILING  
COMMENTS OF ONEPOINT  
COMMUNICATIONS-COLORADO,  
L.L.C. REGARDING THE PROPOSED  
MASTER TEST PLAN FOR ASSESS-  
ING U S WEST COMMUNICATIONS'  
OPERATIONAL SUPPORT SYSTEMS

Snell & Wilmer  
L.L.P.  
LAW OFFICES  
One Arizona Center  
Phoenix, AZ 85004-0001  
(602) 382-6000

Notice is hereby given that OnePoint Communications-Colorado, L.L.C., ("OnePoint") has filed this day its comments regarding the proposed master test plan for assessing U S WEST Communication's Operational Support Systems in the above-captioned docket, and has mailed copies of its comments to each of the parties on the attached mailing list.

In addition, OnePoint will provide copies of its comments at the second OSS workshop scheduled for Monday, September 20, 1999.

DATED this 17th day of September, 1999.

SNELL & WILMER

By [Signature]  
Jeffrey W. Crockett, Esq.  
One Arizona Center  
Phoenix, Arizona 85004-0001  
Attorneys for OnePoint Communications-Colorado,  
L.L.C.

**Snell & Wilmer**  
L.L.P.  
LAW OFFICES  
One Arizona Center  
Phoenix, AZ 85004-0001  
(602) 382-6000

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ORIGINAL AND TEN (10) copies  
filed this 17th day of September, 1999, with:

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

COPIES mailed this 17th day  
of September, 1999, to the  
attached mailing list.

Gina Ball

1 SERVICE LIST FOR:

U S WEST COMMUNICATIONS, INC.'S  
COMPLIANCE WITH § 271 FILING

2  
3 DOCKET NO.

T-00000A-97-0238

4 Thomas M. Dethlefs  
5 U S WEST Communications, Inc.  
6 1801 California Street, #5100  
7 Denver, Colorado 80202

Carrington Phillips  
COX COMMUNICATIONS  
1400 Lake Hearn Drive, N.E.  
Atlanta, Georgia 30319

8 Maureen Arnold  
9 U S WEST Communications, Inc.  
10 3033 N. Third Street, Room 1010  
11 Phoenix, Arizona 85012

Thomas H. Campbell  
LEWIS & ROCA  
40 N. Central Avenue  
Phoenix, Arizona 85007

12 Michael M. Grant  
13 GALLAGHER AND KENNEDY  
14 2600 N. Central Avenue  
15 Phoenix, Arizona 85004-3020

Andrew O. Isar  
TRI  
4312 92<sup>nd</sup> Avenue, N.W.  
Gig Harbor, Washington 98335

16 Timothy Berg  
17 FENNEMORE CRAIG  
18 3003 N. Central Ave., Suite 2600  
19 Phoenix, Arizona 85016

Richard Smith  
COX CALIFORNIA TELECOM, INC.  
Two Jack London Square  
Oakland, California 94697

20 Mark Dioguardi  
21 TIFFANY AND BOSCO PA  
22 500 Dial Tower  
23 1850 N. Central Avenue  
24 Phoenix, Arizona 85004

Richard M. Rindler  
Morton J. Posner  
SWIDER & BERLIN  
3000 K Street, N.W. Suite 300  
Washington, DC 20007

25 Penny Bewick  
26 ELECTRIC LIGHTWAVE, INC.  
27 4400 NE 77<sup>th</sup> Avenue  
28 Vancouver, Washington 98662

Lex J. Smith  
Michael W. Patten  
BROWN & BAIN  
2901 N. Central Avenue  
P.O. Box 400  
Phoenix, Arizona 85001-0400

Thomas L. Mumaw  
SNELL & WILMER  
One Arizona Center  
Phoenix, Arizona 85004-0001

Charles Kallenbach  
AMERICAN COMMUNICATIONS  
SERVICES INC  
131 National Business Parkway  
Annapolis Junction, Maryland 20701

Donald A. Low  
SPRINT COMMUNICATIONS CO L.P.  
8140 Ward Parkway SE  
Kansas City, Missouri 64114

DECISION NO. 61837

1 Karen L. Clauson  
2 Thomas F. Dixon  
3 MCI TELECOMMUNICATIONS CORP  
4 707 17th Street, #3900  
5 Denver, Colorado 80202

6 Richard S. Wolters  
7 AT&T & TCG  
8 1875 Lawrence Street, Room 1575  
9 Denver, Colorado 80202

10 Joyce Hundley  
11 UNITED STATES DEPARTMENT OF  
12 JUSTICE  
13 Antitrust Division  
14 1401 H Street NW, Suite 8000  
15 Washington, DC 20530

16 Joan Burke  
17 OSBORN MALEDON  
18 2929 N. Central Avenue, 21st Floor  
19 P.O. Box 36379  
20 Phoenix, Arizona 85067-6379

21 Stephen Gibelli  
22 Scott S. Wakefield, Chief Counsel  
23 RUCO  
24 2828 N. Central Avenue, Suite 1200  
25 Phoenix, Arizona 85004

26 Patricia L. vanMidde  
27 AT&T  
28 2800 N. Central Avenue, Suite 828  
Phoenix, Arizona 85004

Daniel Waggoner  
DAVIS WRIGHT TREMAINE  
2600 Century Square  
1501 Fourth Avenue  
Seattle, WA 98101-1688

Alaine Miller  
NEXTLINK Communications, Inc.  
500 108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004

Frank Paganelli  
Colin Alberts  
Blumenfeld & Cohen  
1615 M. Street, Suite 700  
Washington, DC 20036

Raymond S. Heyman  
Randall H. Warner  
ROSHKA HEYMAN & DeWULF  
Two Arizona Center  
400 N. Fifth Street, Suite 1000  
Phoenix, Arizona 85004

Diane Bacon, Legislative Director  
COMMUNICATIONS WORKERS OF  
AMERICA  
5818 North 7<sup>th</sup> Street, Suite 206  
Phoenix, Arizona 85014-5811

Paul Bullis, Chief Counsel  
Legal Division  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

Director, Utilities Division  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

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

**DOCKET NO. T-00000A-97-0238**

**COMMENTS OF INTERVENOR ONE POINT COMMUNICATIONS-COLORADO,  
L.L.C., REGARDING THE PROPOSED MASTER TEST PLAN FOR ASSESSING  
U S WEST COMMUNICATIONS' OPERATIONAL SUPPORT SYSTEMS**

**SEPTEMBER 17, 1999**



1 Communications Commission (“FCC”) has ruled that it is necessary to consider all automated and  
2 manual processes that U S WEST undertakes to provide access to OSS functions in order to determine  
3 whether U S WEST has met its obligations under Section 271 of the 1996 Telecommunications Act.  
4 Thus, testing must include all processes, manual and automated. Further, the testing of U S WEST  
5 OSS functions should include the full range of relevant components, beginning with the point-of-  
6 interface (or gateway) by which the CLEC accesses the OSS of U S WEST, to the electronic and/or  
7 manual processing links between that gateway interface and U S WEST's OSS (including all necessary  
8 back office systems and personnel), to the internal systems that U S WEST uses to provide network  
9 elements and resale services to the CLEC. *See*, FCC Order 97-298 at page 69 (September 19, 1997).<sup>1</sup>

10 In its September 3, 1999 comments, OnePoint identified a number of critical areas  
11 where parity does not now exist between OSS provided to CLECs and OSS available to U S WEST's  
12 retail operations. The Master Test Plan must incorporate testing to measure parity in each of these  
13 areas, including but not limited to, the following:

14 • Service Due Date Quoting, including Average Intervals (*i.e.*, the average length  
15 of a service due date quote for a CLEC customers as compared to the average length of a service due  
16 date quote for U S WEST retail customers).

17 • Service Due Date Fulfilment, including Average Intervals (*i.e.*, the average  
18 length of time to complete a service order for CLEC customers as compared to the average length of  
19 time to complete a service order for U S WEST retail customers).

20 • Interval Ranges (*i.e.*, the longest due date quote or service due date fulfilment  
21 for CLEC customers as compared to the longest due date quote or service due date fulfilment for U S  
22 WEST retail customers).

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23  
24 <sup>1</sup> The FCC has declared that it will make a two-part inquiry. First, it will determine whether  
25 U S WEST has deployed the necessary systems and personnel to provide sufficient access to each of  
26 the necessary OSS functions and whether U S WEST is adequately assisting competitors to understand  
how to implement and use all of the OSS functions available to them. Second, there must be a  
determination as to whether the OSS functions that U S WEST has deployed are operationally ready,  
as a practical matter. *See*, FCC Order 97-298, dated September 19, 1997, at page 70.

- 1           •     Comparison of Transaction Types (*i.e.*, the Master Test Plan should identify  
2 situations where CLECs must use manual processes while U S WEST retail representatives may use  
3 automated processes).
- 4           •     Equivalent System Functionality (*i.e.*, do the systems used by CLECs have the  
5 same features, speed, ease-of-use, and support as the systems used by U S WEST).
- 6           •     Speed of Transactions (*i.e.*, can CLECs complete transactions as quickly and  
7 easily using OSS as U S WEST retail representatives using the U S WEST systems to which they have  
8 access).
- 9           •     Automation of Processes and Procedures (*i.e.*, the Master Test Plan should  
10 measure the extent to which U S WEST has maximized automated processes for CLECs).
- 11          •     Quality of Human Interaction (*i.e.*, in those situations where human intervention  
12 is necessary (and cannot be avoided through implementation of an automated process), the Master  
13 Test Plan must measure whether U S WEST has taken sufficient steps to: (i) design a process which  
14 ensures equality of treatment for CLEC customers; (ii) provide training to U S WEST personnel  
15 regarding the required parity between CLEC customers and U S WEST retail customers; (iii) establish  
16 appropriate penalties for cases where equality is not achieved between CLEC customers and U S  
17 WEST retail customers).
- 18          •     Measurement of Successful Service Order Completions (*i.e.*, the Master Test  
19 Plan should look beyond the due date fulfilment statistics reported by U S WEST and assess the  
20 percentage of service orders which actually have dial tone on the service due date).
- 21          •     Number of Escalations (*i.e.*, how many CLEC service orders are escalated as  
22 compared to U S WEST retail service orders).
- 23          •     Speed and Ease of Escalations (*i.e.*, how quickly are CLEC escalations resolved  
24 as compared to U S WEST escalations, and how quickly and easily are CLEC service orders escalated  
25 as compared to U S WEST retail service orders).
- 26



1 **TEST CASES**

2 In implementing the Master Test Plan, the independent third party should consider no  
3 less than 30 test cases for each test. Such a number of cases is necessary to ensure that the test fully  
4 cover the range of scenarios that will likely be experienced by a CLEC. For example, testing should  
5 include LSRs submitted through Interconnect Mediated Access ("IMA") because the majority of  
6 orders currently processed by U S WEST are processed through IMA, as indicated on page 15 of Dean  
7 Buhler's presentation captioned Non-Discriminatory Access to Operation Support Systems dated  
8 September 9, 1999.

9 **DEFINING METRICS WITH SPECIFICITY**

10 The Master Test Plan must define each of the various metrics with specificity.  
11 OnePoint recommends that Staff prepare definitions of the various metrics and that those definitions  
12 be discussed at the third OSS workshop.

13 **FOCUS ON COMMERCIAL USAGE**

14 In its evaluation of Southwestern Bell Company in Oklahoma, the United States  
15 Department of Justice stated that the most probative evidence of OSS functional readiness is actual  
16 commercial usage. *See*, Department of Justice SBC Oklahoma Evaluation at 29-30. Thus, OnePoint  
17 strongly urges that the Master Test Plan be supplemented to include specific provisions for gathering  
18 actual historical data and commentary from current systems users who effectively "test" the systems  
19 every day.

20 **MUTUAL COLLABORATION**

21 The Master Test Plan should establish a collaborative monitoring process to identify  
22 and improve OSS functionality as the process proceeds. This collaborative process should include:  
23 (i) a process by which U S WEST will implement interim and then permanent remedies to address  
24 deficiencies in OSS; (ii) an efficacious dispute resolution mechanism for addressing issues arising out  
25 of the collaborative process including additions, deletions or changes to the performance  
26 measurements; (iii) a well-defined benchmark metric equation subject to third-party audit at U S

1 WEST's own expense; and (iv) an education program for implementation of interim and permanent  
2 remedies.

3 **CHANGE MANAGEMENT**

4 OnePoint recommends that the Master Test Plan include additional detail regarding the  
5 method by which necessary changes will be incorporated into the Master Test Plan as the testing  
6 process moves forward. Further, the Master Test Plan currently lacks important detail regarding the  
7 retesting of OSS functions, as may be required.

8 **BURDEN OF PROOF**

9 U S WEST has the burden of demonstrating that it has met all the requirements of  
10 Section 271 of the 1996 Telecommunications Act. See, FCC Order 97-298, dated September 19,  
11 1997, at page 80). U S WEST must provide the Arizona Corporation Commission with all the  
12 empirical data necessary to substantiate any assertion that its provision of OSS functions is  
13 nondiscriminatory. *See Id.*, at page 104. Further, U S WEST must commit to a comprehensive, step-  
14 by-step and quantifiable program for meeting its Section 271 obligations including performance  
15 benchmarks, published results, time-frames, and self-executing penalties for failures. *See Id.*, at page  
16 85 .

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