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BEFORE THE ARIZONA CORPORATION COMMISSION

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Commissioner

AZ CORP COMMISSION
DOCUMENT CONTROL

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

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MCI WORLDCOM'S Preliminary Comments
on the Arizona Master Test Plan

In accordance with the Memorandum issued by David A. Motycka, Acting Assistant Director, Utilities Division, dated August 25, 1999, MCI WorldCom, Inc. ("MCIW") on behalf of its regulated subsidiaries submits its Comments on the proposed Arizona Test Plan Issue No. 1.0 ("MTP"). It these comments, MCIW identifies significant factors critical for a successful test of the operational support systems ("OSS") interfaces and the OSS, themselves including the back office systems provided by U S WEST Communications, Inc. ("U S WEST"). The proposed MTP is an initial starting point for discussion. MCIW commends Doherty & Company, Inc. ("DCI") in its effort to provide this initial draft.

MCIW has organized its comments by commenting generally upon how an independent third party test of U S WEST's OSS should be conducted and then has provided specific comments about the actual proposed plan.

GENERAL COMMENTS

A. INDEPENDENT THIRD PARTY ADMININSTRATOR AND TEST GENERATOR

It is very critical that a true, neutral third party be selected as the test plan administrator who can provide an objective evaluation of U S WEST's OSS. There must be no conflict of interest among any of the parties involved in this proceeding, including U S WEST, competitive local exchange carriers ("CLECs"), interexchange carriers ("IXCs"), the Residential Utility Consumer Office ("RUCO"), or the Commission ("ACC") Staff.

The independent third party vendor selected to execute the test as a pseudo-CLEC must be technically capable of completing the test and knowledgeable of the business functions.

The MTP is not clear about the actual nature of the testing to be performed and the role of the third party tester. For example, the MTP refers to a third party vendor, a third party consultant, and third party test generator, a Pseudo-CLEC and CLECs, all of whom may be involved in the testing process. It is not clear in the MTP at any time who is performing the relevant tests and documenting the results.

B. SUBMISSION OF ORDERS BY CLECs

At the first OSS workshop held on September 9, 1999, DCI stated that it is hoping that interested CLECs will provide and submit test orders to U S WEST during the test in addition to orders placed by the Pseudo-CLEC. CLEC orders and CLEC OSS are not what are being evaluated in this independent third party test, rather U S WEST's OSS are being evaluated. However while MCIW is not opposed to CLECs submitting orders in

order to evaluate U S WEST's OSS, the focus of the test and associated documentation and evaluation must be on U S WEST OSS, not CLECs OSS.

C. REGIONAL vs. ARIZONA TESTING

As MCIW stated at the first workshop, if the ACC moves forward with this testing at the same time the Regional Oversight Committee (ROC) 13 state OSS test proceeds, U S WEST and the CLECs will be forced to divide limited resources. There will be two different Master Test Plans developed concurrently. A 14-state, region-wide test would be a more efficient and effective use of all parties' resources.

D. LACK OF SERVICES LISTED TO BE TESTED

The services and functions proposed to be tested in the functionality test are too limited. Because the MTP is based on the Texas test which did not establish a pseudo-CLEC and relied upon usage of the AT&T and MCIW production OSS interfaces, the Texas test was limited to testing UNE loops and UNE platform ("UNE-P"). The MTP identifies testing of UNE loops and something called UNE-C, which is more limited than testing UNE-P as discussed later in these comments.

The entire spectrum of potential CLEC orders should be tested. U S WEST stated in its 271 application and at the first workshop that it has deployed the necessary systems and personnel to provide adequate access to its OSS by the CLECs. The test plan must be expanded to include all of the services that CLECs will require to effectively compete in the local market. The following services should be included and tested:

1. XDSL and DSL capable loops
2. Directory Listings with UNE loop
3. Collocation

4. Frame Relay
5. ISDN
6. Switch port - analog and digital

In addition, Jeopardy Notification should be included in the EDI testing as part of the functional test. Jeopardy Notification is identified as a manual process in the MTP. However, U S WEST asserts that Jeopardy Notification is automated in its EDI interface. Therefore, Jeopardy Notification should be tested as an automated function as represented by U S WEST, not as a manual process.

Functional testing limited to only electronic processing.

The MTP indicates the scope of the functional test will include only those services that flow through or partially flow-through the U S WEST systems. This is not a complete test of parity of services. The functional test is a test of parity of services offered to the CLECs, whether it flows through the legacy systems or not. All service types need to be tested and measured to demonstrate the CLEC's capability to compete with U S WEST. The CLECs will be issuing electronic orders for all services regardless of the manual processing that may occur within U S WEST's OSS and legacy systems.

E. UNE - C: UNKNOWN SERVICE

The MTP substitutes a "UNE-C" service where UNE-P applied in Texas. U S WEST has not deployed this product and it appears from a verbal communique that it will be implemented in October 1999. U S WEST has not provided any description of this service and whether it is the "platform" service MCIW has been requesting for years. U S WEST will not provide detailed release information more than 21 days prior to the implementation. The CLECs and the Third Party evaluators should not rely on an

unknown service to be included as a true comparable service to the CLEC required UNE-P service. U S WEST must provide UNE-P, not UNE-C.

F. TRACKING OF ISSUES/RESOLUTION

It is critical that the Third Party provides detailed and accurate tracking of all identified issues and the resolutions to all parties involved. All workshop meetings must be documented by an independent party. The test preparation and issue resolution will directly impact the test schedule and its effectiveness.

G. PERFORMANCE MEASUREMENTS

The Third Party must review all of the processes behind U S WEST's data gathering for performance measurements as well as how the measurements are calculated. The evaluation of the performance measurements is the most objective, qualitative and quantitative means of determining the success of this OSS testing. There must be a separate effort to identify the critical measurements that U S WEST must meet.

H. CHANGE MANAGEMENT REVIEW

A thorough review of U S WEST's new proposed change management must be performed. For example, U S WEST is notifying the CLECs of detailed changes to its OSS only 21 days before implementation. The Pseudo-CLEC must evaluate whether it can effectively compete in the local market when it receives such information on such short notice. The Psuedo-CLEC must develop and modify its interface under the same time frames and based on the same U S WEST documentation CLECs receive in order to determine if CLECs can timely develop a system to effectively compete in the market. The Change Management process evaluation will demonstrate U S WEST's ability to

coordinate system upgrades based on industry standards or system enhancements with the CLECs.

I. RE-TESTING OF IDENTIFIED ISSUES

The MTP does not mention describe re-testing of system errors, but rather indicates that system errors will be allowed by U S WEST. The MTP states, that depending on the severity of the problem, testing may stop or may be continued with the processing problems. This was a major problem with the Texas testing which should not be perpetuated in Arizona. Military-style testing should be used. Under military-style testing, the identified issues must to be corrected by U S WEST and re-tested by the third party to ensure the problem has been corrected. If the problem persists, the process is repeated until problem is finally corrected.

Further, as issues are identified, will U S WEST be able to implement system changes to its production systems during its Y2K moratorium period of November 15, 1999 - January 31, 2000?

J. PROPOSED SCHEDULE

The Third Party test should be driven by the overall objective of determining whether the U S WEST OSS is meeting the FCC guidelines and should not be driven by artificial dates on the proposed third party calendar. Furthermore, the MTP should be fully completed before the start of the test.

K. CLEAR EXIT AND ENTRANCE CRITERIA

Before the test is started, the ACC and the parties involved need to clearly define what are the pass/fail criteria for this Third Party test.

L. TEST ENVIRONMENT

US WEST production systems must be used in the testing. The test environment must simulate the CLEC experience when submitting orders for its customers. Any deviation from the production environment used by the CLECs would impact the validity of the testing.

SPECIFIC MASTER TEST PLAN COMMENTS

PAGE 8

Section 2.2 Overall Approach

Para 1. " Psuedo-CLEC will develop an EDI interface to US West's EDI interface for use in the testing".

Comment. The vendor must develop its interface based on the published specifications without detailed hands-on assistance from U S WEST. The development of the interface will determine whether US WEST has provided sufficient documentation for CLECs to build their interfaces.

Para 3. " US WEST will provide subject matter experts to assist in test definition....."

Comment. The blindness of the test will be adversely impacted if U S WEST is permitted define the test.

PAGE 9

Section 2.3 Current Status

Para 1. "It is also anticipated once the Third Party Consultant is retained,....".

Comment. The MTP should describe the criteria for selecting the Consultant.

PAGE 10

Diagram. The diagram depicts the Firm Order Manager (“FOM”) being interfaced with the IMA GUI for only the U S WEST representative.

Comment. In reality the U S WEST representative does not use the IMA GUI and only CLEC orders are submitted to the FOM. The FOM is a repository for all CLEC orders that are subsequently individually, manually reviewed by U S WEST representatives before processing occurs.

PAGE 13

Section 3.2 Assumptions

Bullet 7. "CLEC participation will not impact the defined schedule."

Comment. The CLECs may be the parties that encounter problems in the provisioning process. If a CLEC encounters a problem in submitting orders, then the schedule may be affected. The third party tester will need to assess the CLEC-discovered problem. U S WEST will need to correct the problem and then the third party tester will need to re-test the system to see if the problem is finally corrected. Therefore, CLEC participation may impact the defined schedule, and the defined schedule must be flexible enough to address all discovered problems. The purpose of this test is complete a comprehensive analysis of U S WEST’s OSS, not to be meet a predetermined, defined schedule which may adversely impact the validity of the test.

PAGE 16

Section 3.4 Product Types/Order Types

Para 1. "Manual Jeopardy"

Comment. US WEST asserts it has an EDI interface for jeopardy notifications.

Jeopardy notifications must be provided electronically and evaluated to determine if these notifications are being provided to CLECs in a proper and timely manner.

PAGE 18

Section 4.1 Functionality Test Purpose

Bullet 3. "Determine if a participant CLEC can obtain an MLT test for a reported trouble".

Comment. This must be tested electronically.

PAGE 20

Section 4.2.3 Billing Interfaces

Comment. EDI Billing. The U S WEST local billing systems are EDI formats that are not industry standard. The third party tester must evaluate this process against the industry standard, CABS. If the EDI format is tested, the third party must be sure to validate the bills from all the regions and note if there is any disparity between the bills.

Section 4.3 Functionality Test Coverage and Scenarios

Comment. Flow through should not only be through the ordering systems but also through the legacy systems as the FCC has defined. The functionality testing should include the manual processing of orders, particularly for those orders received electronically that do not flow through the legacy systems for any number of reasons.

U S WEST indicated it will implement complete electronic flow through of orders with its October system release. The Third Party and the CLECs must evaluate the systems to determine if U S WEST is complying with its assertion of complete electronic flow through after U S WEST's October release.

PAGE 21

Section 4.3.2 Provisioning

Comment. Jeopardy notifications must be included in the list of outbound transactions as part of the functionality test.

PAGE 22

Section 4.3.5 Maintenance and Repair

Comment. The unplanned troubles must also be included as part of the maintenance and repair test.

PAGE 23

Section 4.5 Functionality Test Data

Comment. The section must contain information defining or provisioning the network facilities required by U S WEST and CLECs for UNE-Loop testing.

PAGE 24

Section 4.6 Functionality Test Participants

Comment. This section is unclear by failing to describe which party will submit the test orders, conduct the tests, and report the outputs.

PAGE 25

Section 4.7.1.2 Test Planning Entrance Criteria

Comment. This section must include the entrance criteria for the UNE-loops facilities.

PAGE 27

Section 4.7.3.1 Test Execution Phase Activities – “Third Party Consultant” bullets at top of page.

Comment. This does not apply if the test is performed by a third party.

PAGE 28

Section 4.7.4 Test Analysis and Reporting

Comment. This entire section assumes only the CLECs are performing the tests.

Section 4.8 Functionality Test Success Criteria

Comment. The benchmarks will be used, however, the measurements of parity must also be defined. Military-style testing must be used for the reasons described earlier.

PAGE 29

Section 4.9 Functionality Test Assumptions

Comment. Two billing cycles are not sufficient. Three cycles are required to adequately validate the bill correction process and the disconnect bills.

PAGE 35

Section 6.7.1.1 Last bullet “Define and validate test plans”

Comment. This item should be performed by the third party tester. The test plans must be developed by the third part tester with input from the CLECs.

PAGE 37

Section 6.7.4.1 Test Analysis and Reporting Activities

Comment. It is not clear who would be performing these activities. If the CLECs also perform testing, they should produce reports as well.

PAGE 39

Section 7.1 Change Management Test Purpose

Comment. A formal change management process and document must be developed in cooperation with all CLECs. U S WEST's performance must be evaluated using this process.

PAGE 40

Section. 7.6 U S WEST-CLEC Interaction

Comment. The adherence to industry standard releases must also be added to the list of bullets.

PAGE 41

Section 8.1 Performance Measurement Evaluation Purpose

Comment. Enforcement mechanisms including bill credits, liquidated damages, and other penalties or incentives must be identified in the performance measurements.

PAGE 43

Section 8.4.2 Historical Data Evaluation

Comment. The third party consultant must collect the actual data and calculate the measurement.

PAGE 45

Section 9.1 The ACC

Comment. The ACC should also make rulings if there is no agreement between parties.

Fifth bullet. Appoint test supervisor to oversee day-to-day activities

Comment. It is not clear whether the test supervisor is a new player whose role has not been defined.

Section 9.3 Third Party Consultant

Comment. It is not clear if the third party consultant is a different player than the Pseudo-CLEC, third party vendor, etc.

WHEREFORE, MCIW requests the Commission, its staff, and DCI review these comments and incorporate the proposals contained in these preliminary comments on the MTP.

DATED this 16th day of September 1999.

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September, 1999, the Original and ten copies of MCI WorldCom, Inc.'s Preliminary Comments of the Arizona Master Test Plan were sent via Airborne Express to the Arizona Corporation Commission.

In addition, a true and correct copy of this filing was sent via United States Mail to the following individuals:

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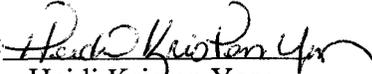
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