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BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COMMISSION

CARL J. KUNASEK
CHAIRMAN
JIM IRVIN
COMMISSIONER
WILLIAM A. MUNDELL
COMMISSIONER

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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

NOTICE OF FILING
THE ARIZONA CORPORATION COMMISSION STAFF'S
STATEMENT OF POSITION

The Arizona Corporation Commission Staff, by its attorneys, hereby file its Statement of Position (attached) on U S WEST Communications, Inc.'s compliance with the various checklist items contained in Section 271 of the Telecommunications Act of 1996 ("1996 Act").

RESPECTFULLY SUBMITTED this 8th day of September, 1999.

Maureen A. Scott
Attorney, Legal Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, Arizona 85007
(602) 542-3402

Original and ten copies of the foregoing were filed this 8th day of September, 1999 with:

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

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Copies of the foregoing Notice of Filing the Arizona Corporation Commission Staff's Statement of Position" were mailed this 8th_ day of September, 1999 to:

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

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

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

Timothy Berg
FENNEMORE CRAIG
3003 N. Central Ave., Suite 2600
Phoenix, Arizona 85016

Mark Dioguardi
TIFFANY AND BOSCO PA
500 Dial Tower
1850 N. Central Avenue
Phoenix, Arizona 85004

Penny Bewick
ELECTRIC LIGHTWAVE, INC.
4400 NE 77th Avenue
Vancouver, Washington 98662

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

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

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

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

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

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

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

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

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

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

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

Joyce Hundley
UNITED STATES DEPARTMENT OF JUSTICE
Antitrust Division
1401 H Street NW, Suite 8000
Washington, DC 20530

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

Stephen Gibelli
Scott S. Wakefield, Chief Counsel
RUCO
2828 N. Central Avenue, Suite 1200
Phoenix, Arizona 85004

Patricia L. vanMidde
AT&T
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 108th 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 7th Street, Suite 206
Phoenix, Arizona 85014-5811

By Monica A. Martinez

COMMISSION STAFF'S INITIAL STATEMENT OF POSITION ON U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH THE SECTION 271 COMPETITIVE CHECKLIST

(DOCKET NO. T-00000A-97-0238)

I. Introduction.

On July 22, 1999, by Order of the Commission, Statements of Position on U S WEST's Section 271 Application were to be filed on or before August 23, 1999. Staff subsequently requested and was granted an extension of time until September 7, 1999. U S WEST filed its Notice of Intent to File with FCC and Application for Verification of § 271 (c) Compliance with this Commission on February 8, 1999. Section 271 of the Telecommunications Act of 1996 ("1996 Act") sets forth various requirements, including a 14 point competitive checklist, that a Bell Operating Company ("BOC") must meet in order to obtain entry into the InterLATA long distance market.

At the outset Staff notes U S WEST has the ultimate burden of proof in this case. U S WEST must:

> present a prima facie case in its application that all of the requirements of Section 271 have been satisfied. Once the applicant has made such a showing, opponents of the BOC's entry must, as a practical matter, produce evidence and arguments necessary to show that the application does not satisfy the requirements of Section 271 or risk ruling in the BOC's favor. [The FCC] emphasize [d], however, that the BOC applicant retains at all times the ultimate burden of proof that its application satisfies Section 271.[1]

As discussed below, Staff tentatively finds, based upon the information currently before it, that U S WEST appears to have satisfied Checklist Items 3, 8, 9, 10, 11, 12, and 13. Staff has come to no final resolution on matters related to the Checklist Items 1, 2, 4, 5, 6, 11, and 14. Non-OSS portions of these elements are still being reviewed by Staff and the OSS related portions of these elements will be addressed later within the context of the OSS testing. Because Staff has not come to a final resolution on Checklist Items 1, 2, 4, 5, 6, 11, and 14, Staff's Report does not address all of these Checklist Items.

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[1] *Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Service in Michigan,* CC Docket No. 97-137, Memorandum Opinion and Order, ¶ 43 (rel. Aug. 19, 1997),(Ameritech Michigan).

II. Discussion of Checklist Compliance.

Checklist Item # 1 Interconnection in Accordance with the Requirement of Sections 251(c)(2) and 252(d)(1)

Section 271(c) (2) (B) (i) states that in order for a RBOC to meet the requirements of Checklist Item No. 1, it must provide "interconnection in accordance with the requirements of Sections 251 (c) (2) and 252 (d) (1)." While U S WEST has numerous approved interconnection agreements on file with the Commission, it has not yet demonstrated it is meeting all of its obligations under those agreements in a non-discriminatory fashion. In order for Staff to fully evaluate this Checklist Item additional information is necessary. Staff is, therefore, of the opinion that U S WEST has not yet demonstrated that it meets the requirements of Checklist Item #1.

Checklist Item # 3 Access to Poles, Ducts, Conduits And Rights-Of Way

Checklist Item #3 requires U S WEST to provide "[n]nondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by the BOC at just and reasonable rates in accordance with the requirements of Section 224. U S WEST is relying, in part, upon its Statement of Generally Available Terms and Conditions ("SGAT") to meet the requirement of Checklist Item #3. In determining whether U S WEST meets this checklist item, Staff considered such factors as access to information, choice of workforce, rates and actual provision of access.

Section 10.8.2.4 of the SGAT commits U S WEST to provide CLECs relevant information within a "reasonable time." There are two problems here: it seems that U S WEST will decide what is relevant on an individual case basis and, more importantly, "reasonable time" is left undefined. In order for access to be nondiscriminatory information must be provided to CLECs within the same time frame that U S WEST makes it available to itself. The FCC's Louisiana Order[2] does accept a five-day time period for CLECs even though Bell South receives the information much faster. While U S WEST's Arizona SGAT does not specify a definite time period, to the best of Staff's information and belief, Staff has not received any complaints from CLECs involving access to information with respect to this Checklist item.

Second, Staff considered whether choice of workforce is available. Section 10.8.2.16 of U S WEST's SGAT states that CLECs can use workers of their choice to attach facilities as long as they have the same qualifications as U S WEST workers. However, only contractors approved by U S WEST can perform make ready work. At Staff's request, U S WEST has recently provided Staff with information concerning the conditions necessary for approval of contractors.

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[2] In the Matter of Application BellSouth Corporation, BellSouth Telecommunications, Inc. and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Louisiana, Memorandum Opinion and Order, CC Docket No. 98-p.21 (rel. October. 13, 1998)

The FCC requires rates for attachments to comply with the methodology laid out in Sections 224(d)(1) and 224(e) of the 1996 Act. U S WEST claims that the rates in their SGAT do conform to this requirement. U S WEST recently provided Staff with cost support for the rates contained in its SGAT.

Finally, Staff considered the actual provision of access to the CLECs. In the Louisiana Order, the FCC stated that the fact that no CLECs had actually occupied space on Bell South's facilities was not relevant since Bell South had shown that it had the procedures in place to accommodate access. In Arizona the situation is different because access has been denied to several CLECs on nine different occasions (3 for poles and 6 for ducts). Nonetheless, Staff believes it is significant that there were no complaints filed on these denials.

In summary, Staff tentatively concludes, pending its review of the additional information submitted by U S WEST, that the Company meets this checklist item.

Checklist Item # 7 Nondiscriminatory Access to 911/E911 and Directory Assistance and Operator Services

Checklist Item # 7 requires:

(viii) Nondiscriminatory access to-
"(I) 911 and E911 services;
"(II) directory assistance services to allow the other carrier's customers to obtain telephone numbers; and
"(III) operator call completion services.

To determine whether U S WEST complies with Checklist Item #7, Staff considered parity of access, database accuracy, use of dedicated trunks for 911 and the availability of unbundled access to the 911 database.

First, the FCC requires that access to 911 and E911 services be provided to the CLECs at parity to how the BOC receives such access. U S WEST's testimony appears to indicate that the CLECs are receiving access to 911 and E911 services on par with the access U S WEST itself receives. Staff is aware of no complaints that have been filed by CLECs indicating that this is not the case.

Second, the FCC has considered whether the E911 database entries for CLECs are handled with the same degree of accuracy as those for U S WEST in Arizona. A third party manages the E911 database and facilities-based CLECs deal directly with this third party. For resellers U S WEST must forward database updates to the third party, which it claims it is doing accurately.

Third, the FCC requires the BOC to provide interconnection through the use of dedicated trunks from the requesting carrier's switching facilities to the 911 control office

at parity with what the BOC provides itself. U S WEST's SGAT Section 10.3.7.4 states that interconnection is provided through the use of dedicated trunks, therefore, this criteria appears to be satisfied.

Fourth, the FCC requires that the BOC provide facilities-based CLECs unbundled access to its 911 database on par with what it provides to itself. U S WEST's SGAT provides for unbundled access on par with the access received by U S WEST. Additionally, the testimony of U S WEST on this point lends further support to Staff's tentative finding that this criteria is satisfied.

For Directory Assistance and Operator Services, the following requirements must be met:

1) The BOC must provide CLECs with access to Operator Services and Directory Assistance that is equal in quality to the access that the BOC provides itself.

2) The BOC must allow CLECs to download the BOC's entire Directory Assistance database and to access specific listings on a per-dip basis.

3) Where technically feasible, the BOC must make available unbranded or rebranded Operator/Directory Assistance services to CLECs through its Operator/Directory Assistance platform.

4) Performance data is necessary to show that the BOC is providing the necessary OSS functions to obtain Operator/Directory Assistance in a timely manner.

U S WEST, through the information supplied in its testimony and the requirements contained in its testimony, appears to meet items 1-3 above. For performance measures U S WEST claims it cannot provide disaggregated performance measures that compare the level of service received by U S WEST's retail customers to the level of service received by the CLECs' customers. They claim that it is not technically feasible to disaggregate U S WEST calls from CLEC calls and thus they cannot provide performance data. Also, the fact that they cannot disaggregate should prevent U S WEST from discriminating. In its Louisiana Order, the FCC indicated that disaggregated performance data is not required if it can be demonstrated that the BOC's procedures make it technically infeasible and/or if the BOC's procedures make discrimination impossible.

In summary, Staff tentatively finds, subject to review of CLEC data and input on this issue, that U S WEST has complied with Checklist Item #7.

Checklist Item # 8 White Pages Listings

Checklist Item #8 requires the BOC to provide white page directory listings for customers of the other carrier's telephone exchange service. White pages are the directory listings of telephone numbers of residences and businesses in a particular area. This checklist item ensures that white pages listings for customer of different carriers are comparable, in terms of accuracy and reliability, notwithstanding the identity of the customer's telephone service provider. 47 U.S.C. § 271 (c)(2)(B)(viii).

The FCC Staff has considered the following criteria in ensuring that the checklist item is met:

a) Whether the listing the BOC provides to a competitor's customers is identical to and fully integrated with the BOCs customer' listing.

b) Whether the BOC provides a White Pages listing for a competitor's customers with the same accuracy and reliability that it provides to its own customers.

c) Whether the BOC has procedures in place that are intended to ensure that the listings provided to a competing carrier are comparable, in terms of accuracy and reliability, to the listings provided to the BOCs customers.

U S WEST witness Lori A. Simpson's (Director in the Wholesale Markets Division of U S WEST) affidavit provides general information as to the types of listing U S WEST offers (primary, premium, and privacy). A primary listing includes a telephone subscriber's name, address, and telephone number. A premium listing includes, but it not limited to, additional listings for other household or business members, cross reference listings, and listings from other cities. Privacy listings include nonlisted and nonpublished listings. U S WEST treats end user listings with the same level of confidentiality as U S WEST end user listings. U S WEST offers premium and privacy listings to CLECs at the retail rate, less the applicable wholesale discount.

U S WEST has entered more than 19,900 listings for more that 30 facility-based and reseller CLECs into U S WEST's listings database. U S WEST's proposed SGAT. at Section 10.4.2.8, 10.4.2.10 and 10.4.2.11 also states CLECs will be provided with white page listings that are nondiscriminatory in appearance and integration. lt further states that the listings are of the same font and size as U S WEST listings, and are as accurate and reliable as the white pages listings U S WEST provides to it own end users, respectively.

To further ensure nondiscriminatory treatment of CLEC listings the same systems and personnel process U S WEST and CLEC listings. CLEC and U S WEST end user listings are commingled in the U S WEST listings database. In addition, CLECs are given opportunities to review their listings for accuracy, as they appear in U S WEST's listings database. U S WEST provides monthly "verification proofs" to CLECs. U S

WEST provided listings to approximately 25 reseller CLECs and 10 facilities-based CLECs in Arizona listings as of January 1999.

Based upon the information available to Staff at this time, it is Staff's tentative conclusion that U S WEST has satisfied the requirements of Checklist Item #8.

Checklist Item #9 Nondiscriminatory Access to Telephone Numbers

Checklist Item #9 requires: "Until the date by which telecommunications numbering administration guidelines, plan, or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers. After that date, compliance with such guidelines, plan, or rules

Telephone numbers are presently assigned to telecommunications carriers based on the first three digits of the local number known as "NXX" codes. To fulfill the nondiscrimination obligation in Checklist Item (ix), a BOC must provide competing carriers with the same access to new NXX codes within an area code that the BOC enjoys. This Checklist Item ensures that competing providers have the same access to new telephone numbers as the BOC does. 47 U.S.C. § 271(c)(2)(B)(ix).

FCC Staff has suggested that State commissions consider the following:

> Whether the BOC has provided nondiscriminatory access to numbers that the BOC assigns in its role as CO administrator.

Margaret S. Bumgarner's (Manager-Federal Regulatory Issues in the Public Policy Organization – U S WEST) affidavit states that this requirement effectively expired September 1, 1998, with the FCC's transfer of the numbering administration responsibilities to Lockheed Martin IMS. Prior to this transfer, according to witness Bumbarner, U S WEST provided CLECs with access to telephone numbers in a nondiscriminatory manner according to the 1996 Act and the FCC's rules. The FCC has considered, inter alia, 1) whether the BOC charges uniform fees and 2) whether the BOC applies identical standard assignment procedures.

U S WEST did charge for the assignment or use of central office codes (NXXs) and it processed all NXX requests, U S WESTs and CLECs, in accordance with the industry guidelines. U S WEST states that it assigned all CLECs NXX codes within 10 working days of the date of receipt of a request. U S WEST assigned 37 NXX codes to CLECs in Arizona during the twelve months prior to the FCC transfer to the new administrator. U S WEST stated that it averaged 3.8 days to assign NXX codes for CLECs and averaged 5.0 days to assign codes to itself. U S WEST had interconnection agreements in place in Arizona making telephone numbers available to CLECs and there have been no complaints to the FCC or this Commission regarding U S West's central office code administration in Arizona.

Based on the information Staff has available to it to date, and the fat that Lockheed-Martin assumed the central office code administration duties from U S WEST effective September 1, 1998, it is Staff's tentative conclusion that U S WEST has satisfied the requirements of checklist item #9.

Checklist Item #10 Databases and Associated Signaling

Checklist Item # 10 requires the BOC to make available nondiscriminatory access to databases and associated signaling necessary for call routing and completion.

Databases and associated signaling refer to the call-related databases and signaling systems that are used for billing and collection or the transmission, routing, or other provision of a telecommunications service. To fulfill the non-discrimination obligation of Checklist Item (x), a BOC must demonstrate that it provides new entrants with the same access to these call-related databases and associated signaling that it provides itself. This checklist item ensures that competing providers have the same ability to transmit, route, complete and bill for telephone calls as the BOC. 47 U.S.C. § 271 (c)(2)(B)(x)

The FCC has suggested that the following considerations are important in evaluating whether a BOC complies with Checklist Item #10.

> a) a comparison of the manner in which a BOC obtains access to its databases and signaling network and the manner in which it provides, or would provide, if requested, such access to competing providers;
>
> b) an explanation of any differences in the manner in which a BOC obtains access to a database or signaling system, and the manner in which such access is provided to a competing provider, the need for such differences, and the basis for the FCC to find that such access satisfies the nondiscrimination requirement.

The U S WEST network is interconnected with other networks, including switches on interexchange carriers, other local exchange carriers and CLECs. Each of these switches and call-related databases, regardless of provider, can be considered a "node" on the Public Switched Telephone Network (PSTN). Each node in the PSTN must exchange information with other nodes to facilitate the completion of a local or long distance telephone call. The exchange of information between network nodes is referred to a signaling.

Call-related databases store data that is used in routing of traffic on the PSTN. Examples of call-related databases include local number portability (LNP), toll-free calling (800/888), Line Information Database (LIDB), and Advanced Intelligent Network (AIN). The LNP database stores the identification of the end office switch that serves a particular telephone number. The LIDB provides screening and validation on alternately

billed services for operator handled calls, including billed-to-third, collect, and calling card calls.

Access to the 800/888 database enables a CLEC to determine where an originating 800/888 toll-fee call should be routed. The InterNetwork Calling Name (ICNAM) database enables a CLEC to query for the listed name information for the calling number in order to deliver that information to the CLEC's end user (called number). The AIN database is the brand name for a type of call-related database that can be used to provide new features for an end user.

U S WEST provides access, on a unbundled basis, to the U S WEST Service Management Systems (SMS) that will allow CLECs to create, modify or update information in U S WEST's call-related databases.

U S WEST has Commission-approved interconnection agreements in place in Arizona as well as the proposed SGAT, which require U S WEST to make access to its signaling network and call-related databases available to CLECs in a non-discriminatory manner. CLECs are interconnected with U S WEST's signaling network and are using U S WEST's call-related databases.

U S WEST witness Margaret S. Bumgarner's affidavit states that there are several carriers operating in Arizona that are interconnected to U S West's signaling network. In addition, there are third party signaling network providers interconnected to U S West's signaling network providing access to other carriers.

Based on the information provided and absent information received to the contrary, Commission Staff has tentatively concluded that U S WEST satisfies the requirements of Checklist Item #10.

Checklist Item #11 Number Portability

Checklist Item # 11 provides:

> Until the date by which the Commission issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations.

Number portability enables consumers to take their phone number with them when they change local telephone companies. To fulfill Checklist Item # (ix), the BOC must provide number portability in a nondiscriminatory manner as soon as reasonably possible following a request from a competitor. This Checklist Item is important because it permits consumers to change service providers without having to change their telephone number. 47 U.S.C. § 271 (c)(2)(B)(xi)

The FCC suggests consideration of the following:

1a) With respect to interim number portability, a BOC should be required to furnish the specific method of interim number portability that a competing carrier requests, if such method is technically feasible and not unduly burdensome. In deciding whether a particular method is unduly burdensome, relevant factors are the extent of network upgrades needed to provide that particular method, the cost of such upgrades, the business needs of the requesting carrier, and the timetable for deployment of a long-term number portability method in that particular geographic location.

1b) Whether the BOC's rates for interim number portability comply with the FCC's criteria for competitive neutrality.

2a) With respect to long-term number portability, relevant information would include the BOC's schedule for intra- and inter-company testing of a long-term number portability method.

2b) The current status of switch request process, including identification of the particular switches for which the BOC is obligated to deploy number portability and the status of deployment in requested switches.

2c) The schedule under which the BOC plans to provide commercial roll-out of a long-term number portability method in specified central offices in the relevant State.

3a) With respect to both long-term and interim number portability, whether the BOC is providing number portability in a nondiscriminatory manner. Competing carriers must have nondiscriminatory access to the various functions of the BOC's operations support systems in order to request and obtain number portability in a timely and efficient manner.

3b) Whether provision of number portability is coordinated with loop cutovers so that the competitive LEC's customers do not experience prolonged service disruptions between transfer of service from the BOC to the competitive LEC.

Margaret S. Bumgarner's affidavit states that U S WEST has legally binding commitments to provide number portability, both interim number portability (INP) and long-term number portability (LNP), available to CLECs through its approved interconnection agreements and its proposed SGAT in Arizona. As of February 28, 1999, U S WEST has ported 43,294 telephone numbers in Arizona, 11,009 with INP and 32,285 with LNP.

U S WEST provides long-term number portability (LNP) using the Location Routing Number (LNR) architecture. LRN is an addressing and routing method that allows the re-homing of individual telephone numbers to other switches through the use of a database.

U S WEST provides interim number portability (INP) through remote call forwarding (RCF); direct inward dialing trunks (DID); and route indexing, both direct routed Directory Number Route Indexing (DNRI) and tandem routed, also called Portability Hub-Route Indexing (PH-RI). SGAT provisions also contain the general description and commitment by U S WEST for providing INP.

Remote call forwarding (RCF) operates by routing a telephone call through the U S WEST central office switch that originally served the customer. The switch forwards the incoming call to the ported number using remote call forwarding technology to the customer's "destination" telephone number assigned by the CLEC.

Direct inward dialing (DID) also operates by routing a telephone call through the U S WEST central office switch originally served the customer. The CLEC will establish a DID trunk group from the U S WEST end office to the CLEC end office and the individual telephone numbers will be assigned to that trunk group.

Route indexing also operates by routing a telephone call through U S WEST central office switch that originally served the customer. Two types of route indexing-direct trunked, Directory Number Route Indexing (DNRI), and tandem routed, Portability Hug Route Indexing (PH-RI), A permanent route index is assigned to the end user's ported number in the U S WEST switch. The route index points the call to a specific trunk group assigned to the CLEC.

U S WEST states that it also makes available NXX migration (referred to as Local Exchange Routing Guide – LERG). This can be used in instances where an NXX assigned to U S WEST is assigned exclusively to one customer, and that customer chooses to be served the a CLEC.

U S WEST provided LNP in Arizona in all of the Phoenix MSA on August 3, 1998 and in all of the Tucson MSA on November 2, 1998 which meet the dates specified by the FCC's LNP schedule for the 100 largest MSAs. LNP is now available to approximately 90% of U S WEST's access lines in Arizona. In March 1999, U S WEST received requests to convert 16 additional exchanges outside Phoenix and Tucson.

U S WEST currently has processes in place to manage the provisioning of INP. They have extended their normal hours of operation for the work centers to process number portability orders from 7:00a.m. to 7:00p.m., plus provided for both coordinated and con-coordinated INP out-of-hours conversions to minimize the out-of-service impacts on customers (included in proposed SGAT).

However, Staff continues to have concerns regarding the company's LNP performance measurements. U S WEST responses to Staff's data requests on this issue were not fully responsive.

Based on the information available to it, and subject to further review of the Company's performance measurements, it is Staff's tentative conclusion that U S WEST has otherwise satisfied the requirements of Checklist Item #11.

Checklist Item #12 Local Dialing Parity

Checklist Item #12 requires the BOC to provide "[n]ondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of section 251(b)(3)."

Local dialing parity permits customers to make local calls in the same manner regardless of who their service provider is. To fulfill the nondiscriminatory obligation in Checklist Item (xii), a BOC must establish that customers of a competing provider are able to dial the same number of digits to make a local call, notwithstanding the identity of the customer's or the called party's, local telephone service provider. In addition, the dialing delay experienced by the customers of a competing provider should not be greater that that experienced by customers of the BOC. This Checklist Item ensures that customers are not inconvenienced in how they make calls simply because they subscribe to a competing provider for local telephone service. 47 U.S.C. § 271 (c)(2)(B)(xii)

The FCC has suggested that the following criteria are important in determining whether a BOC has met this Checklist Item:

> A BOC must establish that customers of competing carriers are able to dial the same number of digits that the BOCs customer dials to complete a telephone call and they do not experience unreasonable dialing delays.

According to U S WEST witness Bumgarner's affidavit, U S WEST has specific legal obligations to make local dialing parity available in its various interconnection agreements and pursuant to the proposed SGAT. There is no difference in the number of digits U S WEST or CLEC customers must dial to complete a given local call to any other local customer or to access operator services or directory assistance. U S WEST does not impose any requirement or technical constraint that requires CLEC customers to dial any access codes or greater number of digits than U S WEST customers to complete the same call, or that causes CLEC customers to experience inferior quality with post-dialing delays. A call originating from a CLECs network is treated the same as a call originating from within U S WEST's network, because U S WEST's switches can not distinguish between such calls. There are no charges for local dialing parity.

Based on the information available to Staff and absent information to the contrary, Staff tentatively concludes that U S WEST has satisfied the requirements of Checklist Item #12.

Checklist Item # 13 Reciprocal Compensation

Checklist Item # 13 requires that the BOC provide reciprocal compensation arrangements in accordance with the requirements of sections 251(c)(4) and 252(d)(3).

Section 252(d) requires (i) that the terms and conditions for reciprocal compensation provide for the mutual and reciprocal recovery by each carrier of costs associated with the transport and termination on each carrier's network facilities of calls that originate on the network facilities of other carriers and (ii) such terms and conditions determining such costs on a reasonable approximation of the additional costs of terminating such calls.

According to the Department of Justice ("DOJ"), Checklist Item 13 is satisfied if the SGAT contains provisions for reciprocal compensation and if there are no disputes concerning the BOC's payment of reciprocal compensation. U S WEST's SGAT provides reciprocal compensation. Rates for reciprocal compensation were approved by the Commission in the consolidated Cost Docket. Included were rates for call termination, direct trunk transport, tandem-switched transport, and call transit.

Based upon the information available to Staff at this time, and absent information subsequently received to the contrary, it is Staff's tentative conclusion that U S WEST has satisfied the requirements of Checklist Item # 13.

II. Conclusion

Staff tentatively concludes, based upon the information available to it currently, that U S WEST appears to have satisfied Checklist Items 3, 8, 9, 10, 11, 12 and 13.