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BEFORE THE ARIZONA CORPORATION COMMISSION

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

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Docket No. T-00000~~B~~-97-0238

U S WEST'S COMMENTS
REGARDING CHANGES TO
MASTER TEST PLAN

U S WEST, by its counsel, respectfully submits its comments and position statement regarding the changes to the Master Test Plan issued proposed by Doherty & Company, Inc. ("DCI"). This document memorializes the changes that U S WEST suggested during the last workshop in this matter, and U S WEST is not proposing any additional changes in this document.

ARIZONA CORPORATION COMMISSION
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U S WEST'S COMMENTS
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MASTER TEST PLAN

Section 1 – Executive Overview

In the paragraph titled "Test Exception Process" U S WEST proposes that the first sentence read:

This is a formal process which includes retesting, **when appropriate under Section 2.2.1**, when an interface system or process tested by the Pseudo-CLEC/Third Party Consultant does not meet established criteria, standards, or expectations, in order to resolve the test exception.

This proposed change would incorporate the concept included in Section 2.2.1 that the Third Party Consultant or the ACC will determine if an exception warrants retesting.

Section 2.2 – Overall Approach

U S WEST proposes that the final sentence be changed to read:

For example, MCI agreed, at the second workshop, to enter, **or to allow the Pseudo-CLEC to enter**, repair orders through its EB-TA interface.

This proposed change provides the Third Party Consultant additional flexibility in designing the testing.

Section 2.2.1 – Test Exception Process

U S WEST proposes that the first sentence read:

The Test Exception Process a formal process which includes retesting, **when appropriate hereunder**, when an interface system or process tested by the Pseudo-CLEC/Third Party Consultant does not meet established criteria, standards, or expectations, in order to resolve the test exception.

This proposed change would incorporate the concept included in Section 2.2.1 that the Third Party Consultant or the ACC will determine if an exception warrants retesting.

Section 2.2.3 – Additional Tests

U S WEST proposes that the phrase “, **new service offerings initiated during the test period**” be removed from the first sentence. If this language is not removed, additional scenarios may be added which could greatly expand the scope of the testing, or unacceptably delay the conclusion of testing. U S WEST understands that situations may develop during the testing process that will justify adding new scenarios. However, U S WEST is concerned that parties may use the current language to delay testing whenever the FCC issues a new order regarding additional required services.

To ensure that new scenarios are not used to delay testing, U S WEST suggests that the following be added at the end of Section 2.2.3:

8. All new scenarios will be tested in a manner that will not impact the timeline for completing the already-scheduled testing.

Section 3.4 – Product Types/Order Types

U S WEST understands the addition of Private Line and Centrex scenarios because, while there is no current Arizona demand, there is demand for those products in U S WEST’s region.

However, U S WEST suggests that the scenarios for ISDN be removed, as there is virtually no demand for those products anywhere in U S WEST's region.

Section 5.2 – Retail Parity Evaluation Scope

U S WEST suggests that the phrase **“To the extent possible and appropriate,”** be added to the start of the second sentence. This phrase reflects the reality that it is not always possible to compare the timeframe in which information is returned in U S WEST's internal interfaces to the timeframe in which the same information is returned through IMA or EDI, as the processes are different. However, the Third Party Consultant would still conduct an overall comparison of the interfaces.

Section 7.6.1 – Network Design, Collocation, and Interconnection Trunking Requests

U S WEST suggests that the last sentence in the first paragraph be changed to read:

Measures demonstrating fulfillment performance will be evaluated in the Performance Measurement Test.

This language better describes the testing that will be conducted pursuant to the Performance Measurement Evaluation.

Section 9.7 – TAG

In the fifth bullet-point, U S WEST suggests that word **“CLEC”** be changed to **“member.”** This change reflects the fact that input will be taken from all TAG members, not just CLECs.

Dated: October 12, 1999.

Respectfully submitted,

By: 

Andrew D. Crain
Charles W. Steese
Thomas M. Dethlefs
U S WEST Law Department
1801 California Street
Suite 5100
Denver, CO 80202
(303) 672-2995

FENNEMORE CRAIG, P.C.
Timothy Berg
3003 North Central Ave., Suite 2600
Phoenix, AZ 85012
(602) 916-5421

Attorneys for U S WEST Communications, Inc.

**ORIGINAL and 10 copies of the foregoing filed
this 12th day of December, 1999, with:**

Docket Control
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

**COPY of the foregoing hand-delivered
this 12th day of December, 1999, to:**

Maureen A. Scott, Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Deborah Scott, Acting Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Jerry Rudibaugh, Chief Hearing Officer
Hearing Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ 85007

**COPY of the foregoing mailed
this 12th day of December, 1999, to:**

Steven H. Kukta
Darren S. Weingard
Sprint Communications Company, LP
1850 Gateway Drive, 7th floor
San Mateo, CA 94404-2567

Thomas Campbell
Lewis & Roca
40 N. Central Ave.
Phoenix, AZ 85004

Joan S. Burke
Osborn Maledon, P.A.
2929 N. Central Ave., 21st Floor
PO Box 36379
Phoenix, AZ 85067-6379

Thomas F. Dixon
Karen L. Clausen
MCI Telecommunications Corp.
707 17th Street # 3900
Denver, CO 80202

Stephen Gibelli
Residential Utility Consumer Office
2828 North Central Ave., Suite 1200
Phoenix, AZ 85004

Michael M. Grant
Gallagher & Kennedy
2600 N. Central Ave.
Phoenix, AZ 85004-3020

Michael Patten
Lex J. Smith
Brown & Bain
2901 N. Central Ave.
Phoenix, AZ 85012

Daniel Waggoner
Davis, Wright & Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688

Richard S. Wolters
Maria Arias-Chapleau
AT&T Law Department
1875 Lawrence Street # 1575
Denver, CO 80202

David Kaufman
e.spire Communications, Inc.
466 W. San Francisco Street
Santa Fe, NM 87501

Alaine Miller
NEXTLINK Communications, Inc.
500 108th Ave. NE, Suite 2200
Bellevue, WA 98004

Carrington Phillip
Cox Communications, Inc.
1400 Lake Hearn Dr., N.E.
Atlanta, GA 30319

Diane Bacon, Legislative Director
Communications Workers of America
5818 N. 7th St., Suite 206
Phoenix, Arizona 85014-5811

Penny Bewick
Electric Lightwave, Inc.
4400 NE 77th Ave.
Vancouver, WA 98662

Philip A. Doherty
545 South Prospect Street, Suite 22
Burlington, VT 05401

W. Hagood Bellinger
5312 Trowbridge Drive
Dunwoody, GA 30338

Joyce Hundley
U.S. Dept. of Justice
Antitrust Division
1401 H Street, NW, # 8000
Washington, DC 20530

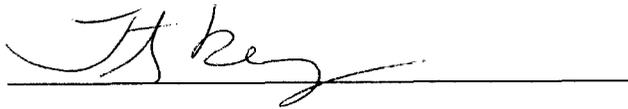
Andrew O. Isar
Telecommunications Resellers Association
4312 92nd Ave., NW
Gig Harbor, WA 98335

Raymond S. Heyman
Randall H. Warner
Two Arizona Center
400 North 5th Street, Suite 1000
Phoenix, AZ 85004-3906

Craig Marks
Citizens Utilities Company
2901 North Central Avenue, Suite 1660
Phoenix, Arizona 85012

Douglas Hsiao
Rhythms Links, Inc.
6933 Revere Parkway
Englewood, CO 80112

Jim Scheltema
Blumenfeld & Cohen
1625 Massachusetts Ave. N.W.
Suite 300
Washington, D.C. 20036

A handwritten signature in cursive script, appearing to read "Jim Scheltema", is written above a solid horizontal line.