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AZ CORP COMMISSION
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Maureen Scott
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007-2996

Arizona Corporation Commission
DOCKETED

DEC 22 1999

Re: **Docket No. T-00000A-97-0238**

DOCKETED BY

Dear Ms. Scott:

On Monday, December 13, 1999, the Staff of the Arizona Corporation Commission released Doherty & Company, Inc.'s ("DCI") Report on Hewlett-Packard's ("HP") operations support systems ("OSS") related work for U S WEST Communications, Inc. ("U S WEST"). On December 14, 1999, AT&T Communications of the Mountain States, Inc. ("AT&T") and a number of other competitive local exchange carriers provided their responses to the Report. AT&T wishes to memorialize its concerns raised at the meeting on December 14, 1999.

It is apparent from the Report that HP worked on U S WEST's IMA/EDI OSS interfaces. Report at 2-5. According to the Report, HP developed software for U S WEST, based on U S WEST's requirements; however, U S WEST's requirements were "finalized by U S WEST with input by HP." *Id.* at 2. DCI recommended that HP be allowed to serve as the Test Transaction Generator, or pseudo-CLEC, for the Arizona 271 OSS test. DCI also recommended the use of a firewall and identified certain requirements that must be met by HP. It appears from the Report that DCI's recommendations are based on the notion that HP will not evaluate or report on the performance of U S WEST's EDI or IMA interfaces or U S WEST's OSS and will only document results.

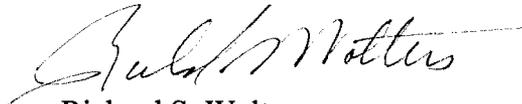
Language in DCI's report conflicts with DCI's assumption. DCI's Report states that HP as pseudo-CLEC will "evaluate" that experience. *Id.* at 1. The Report also states that "[HP] will report only on the ease or difficulty it encounters in operating as a CLEC." *Id.* This evaluation is, in large part, subjective. Thus, it is apparent from DCI's Report that HP will not simply document results.

AT&T's questions whether the proposed firewall can remove the obvious conflict of HP. As AT&T pointed out at the meeting, this is not a matter of HP doing general

software development work for U S WEST. HP worked on the very systems that HP will have to evaluate as a pseudo-CLEC. And as MCI WorldCom's attorney pointed out, when the evaluation moves into those areas where a decision can go either way, it puts the evaluator in a very difficult position by asking the evaluator to render an impartial decision without being influenced by the fact that U S WEST is a client and HP performed work on the very U S WEST's interfaces and OSS being evaluated.

AT&T cannot agree that the firewall proposed by HP and DCI will eliminate the conflict. Accordingly, AT&T cannot give its "blessing," as one carrier stated, to HP's continuing role as the pseudo-CLEC. AT&T also reserves the right to raise, at any time, issues regarding HP's role as pseudo-CLEC and the conflicts raised due to HP's prior and continuing contractual relationship with U S WEST.

Sincerely,



Richard S. Wolters

cc: Service List

RSW/crd

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T's Letter to Staff of the Arizona Corporation Commission regarding Docket No. T-00000A-97-0238, were sent via overnight delivery this 21st day of December, 1999, to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and that a copy of the foregoing was sent via overnight delivery this 21st day of December, 1999 to the following:

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