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BEFORE THE ARIZONA CORPORATION COMMISSION

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<b>IN THE MATTER OF THE U S WEST COMMUNICATIONS, INC. COMPLIANCE WITH SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996</b>	) ) ) ) ) )	<b>Docket No. T-00000<del>B</del><sup>A</sup>-97-0238</b>  <b>U S WEST'S RESPONSE TO SUPPLEMENTAL COMMENTS OF AT&amp;T AND TCG ON MASTER TEST PLAN</b>
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U S WEST, by its counsel, respectfully submits its response to AT&T and TCG's Supplemental Comments on Proposed Master Test Plan.

After three workshops where AT&T indicated that it had no further proposals for additions to the Master Test Plan, and after submitting several pleadings proposing additions to the Master Test Plan, AT&T has submitted its Supplemental Comments proposing more than 70 new testing scenarios. There may be developments that justify additions of scenarios, but AT&T appears to take every opportunity to dream up new ways to increase the scope of the test.

Before addressing the specifics of AT&T's proposed scenarios, U S WEST has an overall concern. For new products and requirements, U S WEST is concerned that AT&T is implying that U S WEST must have mechanized ordering processes before 271 relief can be granted. For example, AT&T appears to imply that U S WEST cannot be granted 271 relief until it mechanizes processes related to new requirements that are indicated in the FCC's press release regarding its order on remand identifying those network elements that must be unbundled (the FCC has not yet issued its order). If the argument is accepted, U S WEST may never be able to obtain interLATA relief. The telecommunications industry is very dynamic; new products and services are being

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developed and introduced all the time. In addition, the FCC and other regulatory bodies are continually adding new obligations and requirements.

Development of software and mechanization of the ordering process is a lengthy process. And U S WEST must be given time following the identification of new products or new requirements to develop a mechanized process. There is no indication in the text of Section 271 or the FCC's orders on 271 applications that indicates that a BOC must wait to obtain 271 relief for the mythical day when it has mechanized the ordering process for all products and no new products have been introduced and no new requirements have been identified.

**I. THE MASTER TEST PLAN CONTAINS MANY OF AT&T's PROPOSED SCENARIOS FOR TESTING OF COMBINATIONS OF NETWORK ELEMENTS.**

AT&T has proposed that 16 new scenarios be added to the Master Test Plan for the testing of UNE combinations. Several of those scenarios are already included in the Test Plan, and U S WEST will not object to adding several others to the Master Test Plan. Apparently, confusion has developed from U S WEST's use of the term UNE-C rather than UNE-P. U S WEST's term UNE-C encompasses the scenarios proposed by AT&T. U S WEST has adopted the term UNE-C to clarify that its obligations are limited to provisioning UNEs that are already combined in the network. It is not obligated to combine elements that are not already combined in the network.

The following scenarios are already included in the Master Test Plan:

- Migration as is of USWC POTS small business customer to CLEC UNE-P
- Migration as is of USWC POTS residential customer to CLEC UNE-P
- Migration as specified of USWC POTS small business customer to CLEC UNE-P

- Migration as specified of USWC POTS residential customer to CLEC UNE-P
- Add features to CLEC UNE-P small business customer
- Add features to CLEC UNE-P residential customer

U S WEST is willing to add the following scenarios to the test:

- CLEC UNE-P small business customer cannot receive or originate calls
- CLEC UNE-P residential customer cannot receive or originate calls
- CLEC requests trouble history on UNE-P small business customer
- CLEC requests trouble history on UNE-P residential customer
- CLEC performs MLT on UNE-P small business customer
- CLEC performs MLT on UNE-P residential customer

AT&T suggests that win-backs be tested, which is not appropriate for the testing.

The testing focuses on services U S WEST provides to CLECs, not the services it provides to itself. Therefore, there is no need to test win-backs, and the following scenarios should not be added to the test:

- CLEC UNE-P small business customer moves back to USWC
- CLEC UNE-P residential customer moves back to USWC

In addition, there has been no demonstrated demand for conversion of UNE-P to unbundled loop. Therefore, the following scenarios are not necessary:

- Migration of CLEC UNE-P small business customer to CLEC unbundled loop customer with number portability
- Migration of CLEC UNE-P residential customer to CLEC unbundled loop customer with number portability

**II. IT IS PREMATURE TO ADD SCENARIOS FOR EEL AND DARK FIBER TO THE TEST PLAN.**

AT&T proposes that scenarios for enhanced extended loop (EELs) and dark fiber be added to the test. The FCC has not yet issued its order defining these elements, and it is premature to even consider adding scenarios for these products until the obligations to provide such products is defined. For example, AT&T proposes that scenarios be added for conversion of special access services to EELs. Yet, the FCC has specifically indicated that it will not as yet order that ILECs are obligated to provide EELs for use as special access circuits. In its press release, the FCC stated that:

Finally, the Commission also concluded that the record in this proceeding does not address sufficiently issues surrounding the ability of carriers to use certain unbundled network elements as a substitute for the incumbent LEC's special access services. The Commission therefore adopted a Further Notice of Proposed Rule Making (NPRM) seeking comments on these issues.

The fact that AT&T proposes testing of use of EELs for special access, where the FCC has specifically indicated that it has not addressed the issue, demonstrates that new scenarios should not be suggested based upon a press release.

**III. THE FRIENDLIES WILL BE MANAGED BY THE THIRD PARTY.**

AT&T suggests that the Master Test Plan needs to be amended to indicate that the friendlies will be managed by the Third Party Consultant. It is U S WEST's understanding from reading the Master Test Plan that the friendlies will be managed by the Third Party Consultant. There is no need to amend the Master Test Plan, but U S WEST has no objection to amending the Plan to make clear who will manage the friendlies.

**III. THE MASTER TEST PLAN INCLUDES LSRs WITH ERRORS IN THE CAPACITY TEST.**

It is U S WEST's understanding that the Master Test Plan has already been amended to include in the Capacity Test LSRs with errors.

**IV. THE PARTICIPANTS IN THE TAG SHOULD BE ABLE TO SUGGEST AGENDA ITEMS, BUT SOMEONE SHOULD CONTROL THE AGENDA.**

AT&T suggests that the Master Test Plan needs to be amended to indicate that any TAG member will be able to add agenda items to TAG meetings. U S WEST believes that the procedures for conducting TAG meetings should be set within the context of those meetings, and that those procedures need not be added to the Master Test Plan. The TAG procedures should be flexible to adapt to unanticipated needs and so that they can evolve to more efficiently run the TAG process.

Of course, U S WEST agrees that all TAG members should be allowed to suggest agenda items. However, the party conducting the meetings should control the agenda. That party should be able to decide which agenda items are most important and should be addressed first. That party should also be able to decide that certain proposals need not be added to the agenda, because they have already been decided or for other reasons.

**V. THE PROVISIONING PROCESS IS PART OF THE TESTING PROCESS.**

It is U S WEST's understanding that the provisioning of products is already part of the Functionality Test. However, U S WEST believes that the Third Party Consultant should have the flexibility to decide if there are scenarios, or iterations within scenarios, that need not be actually provisioned because actual provisioning is impractical, is not possible or does not add value.

**VI. CLECs WILL HAVE INPUT INTO THE FINAL MASTER TEST PLAN.**

U S WEST does not understand why AT&T is worried that it will not have input into the Master Test Plan. In every stage of this process, the CLECs have had input. They have filed numerous pleadings suggesting changes to the Test Plan, and have made further suggestions during four workshops. U S WEST does not see anything in the Master Test Plan that indicates that they will not have any input in the future.

**VII. THERE IS NO REASON TO ADD A PROCEDURE FOR DEVELOPING THE FINAL MASTER TEST PLAN.**

There is no reason to set forth absolutely everything in the Test Plan. It is understood that the Third Party Consultant, along with the ACC and DCI, will develop the final Master Test Plan. Those parties should have the ability to decide what procedure to follow when developing the Final Master Test Plan.

**VIII. AT&T's ADDITIONAL SCENARIOS ARE UNNECESSARY.**

In addition to additional scenarios for EEL, UNE-P and dark fiber, AT&T suggests that more than 50 new scenarios be added to address absolutely every possibility. Those suggestions are unnecessary. The Master Test Plan is already much more comprehensive than the testing in other states such as Texas. There must be some limit to the testing, or it will never be completed.

**A. Day of Installation**

AT&T suggests the addition of more than 20 scenarios for troubles and status on the day of installation. There is no reason to make these separate scenarios, and there is no reason that the test plan be broken down into this type of detail.

**B. Orders Placed After 8:00**

As U S WEST made clear at the last workshop, it was mistaken when it stated that its preorder and order interfaces are available after 8:00. Therefore, there is no reason to add these scenarios to the test.

**C. High Volume Facilities Check**

AT&T has misinterpreted statements made by Lynn Notarianni in a Minnesota hearing, and its suggestion that something called “high volume facilities check” be added is based upon that misinterpretation. Ms. Notarianni merely stated that, if a CLEC desired to do so, it could develop programs in the CLEC’s internal OSS to send large numbers of preorder transactions through the EDI interface. This is not a program that U S WEST has developed, and it is not part of U S WEST’s offering to CLECs. Therefore, this functionality is not something that could be tested, and it is not appropriate to add the proposed scenarios to the test.

**D. UDIT**

AT&T proposes five additional scenarios for unbundled dedicated interoffice transport. There has been very little demand for UDIT in Arizona, and these scenarios are not necessary.

**E. Working Left Ins**

There is no need for specific scenarios to address working left ins. Working left ins will presumably be encountered during the Functionality Test and the Retail Parity Evaluation. There is no need to create specific scenarios.

**F. Supplements**

There is no need for specific scenarios to address supplements. Supplements will presumably be part of the Functionality Test and the Retail Parity Evaluation. There is no need to create specific scenarios.

**G. Out of Hours Installation**

AT&T has added this scenario to address U S WEST's former policy of not offering out-of-hours cutovers. U S WEST has recently notified CLECs that it has changed this policy, and U S WEST now offers out-of-hours cutovers. Therefore, there is no reason to add these scenarios.

**H. Automatic Completion Notices**

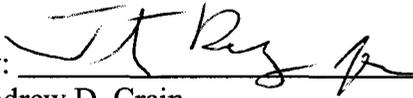
AT&T is mistaken regarding what it calls U S WEST's automatic completion process. U S WEST has developed a program that automatically calls its end users on the day they are scheduled for work. When it calls an end user, the automatic dialer does not know whether or not the work has been completed. If the call is completed, a message is played welcoming the end user and indicating that the end user should call the business office if there are problems.

U S WEST cannot perform this function for CLECs. It is not allowed to call the CLECs' end users. Since the automatic dialer does not know if an order has been completed, there is no sense in it calling the CLEC. The CLEC knows when work is scheduled. An automatic call would not give the CLEC any additional information.

If a CLEC so desires, it could implement an automatic dialer to call its end users on the day work is scheduled.

Dated: November 2, 1999.

Respectfully submitted,

By:  \_\_\_\_\_

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