

**U S WEST, Inc.**  
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Denver, Colorado 80202  
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**Thomas M. Dethlefs**  
Senior Attorney



0000008543

**U S WEST**  
RECEIVED  
AZ CORP COMMISSION

APR 13 1 22 PM '98

DOCUMENT CONTROL

April 13, 1998

**HAND DELIVERED**

ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, AZ 85007

**RE: In the Matter of U S WEST Communications, Inc.'s Compliance  
With § 271 of the Telecommunications Act of 1996.  
Docket No. U-0000-97-238**

Pursuant to Arizona Corporation Commission Decision 60218, U S WEST submits affidavits demonstrating that it has complied with the following checklist items:

- 7) 911 and E911 Services, Directory Assistance, and Operator Services
- 8) Directory Listings
- 9) Numbering
- 10) Unbundled Signaling and Databases
- 12) Local Dialing Parity

~~Arizona Corporation Commission~~  
**DOCKETED**

APR 13 1998

DOCKETED BY	<i>mt</i>
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Enclosed for filing is the original and 10 copies of the Affidavits of Mary Pavlik, Leila Gibson and Kathryn Malone. Exhibits MLP-1 and MLP-4 of the Affidavit of Mary Pavlik and Exhibit LAG-4 of the Affidavit of Leila Gibson contain information which is proprietary to U S WEST's customers and therefore we are filing redacted copies with Docket Control at the Commission. Unredacted versions of these exhibits have been or will be provided to interested parties that have signed an appropriate protective agreement.

Very truly yours,

Thomas M. Dethlefs

Enclosures

**ORIGINAL and 10 copies of the foregoing hand-delivered for filing this 13th day of April, 1998, to:**

Docket Control  
ARIZONA CORPORATION COMMISSION  
1200 West Washington  
Phoenix, AZ 85007

**COPY of the foregoing hand-delivered this 13th day of April, 1998 to:**

Christopher Kempley  
ARIZONA CORPORATION COMMISSION  
Legal Division  
1200 West Washington  
Phoenix, AZ 85007

Ray Williamson, Acting Director  
ARIZONA CORPORATION COMMISSION  
Utilities Division  
1200 West Washington  
Phoenix, AZ 85007

**COPY of the foregoing mailed this 13th day of April, 1998, to:**

Michael M. Grant  
Gallagher and Kennedy  
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Phoenix, AZ 85004-0001

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Thomas H. Campbell  
Lewis and Roca  
(for MCI Telecommunications and  
MCImetro Access)  
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Phoenix, AZ 85004

Karen L. Clauson  
Thomas F. Dixon  
MCI Telecommunications Corporation  
707 17<sup>th</sup> Street  
Suite 3900  
Denver, CO 80202

A handwritten signature in black ink, appearing to read "Pamela Davis", written over a horizontal line.

AFFIDAVIT  
OF  
PAVLIK



STATE OF MINNESOTA        )  
  ) SS.  
COUNTY OF HENNEPIN     )

AFFIDAVIT OF MARY L. PAVLIK

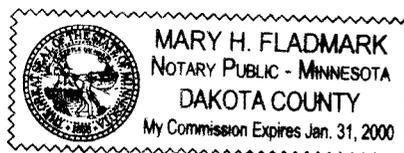
Mary L. Pavlik, being first duly sworn, states as follows:

1. My name is Mary Pavlik. I am Manager-Product and Market Management of U S WEST Communications, Inc. in Minneapolis, Minnesota.
2. Attached hereto and made a part hereof for all purposes is my affidavit consisting of pages numbered 1 through 10, and Exhibits MLP-1, MLP-2, MLP-3, and MLP-4.
3. I hereby swear and affirm that the statements and data contained in the attached affidavit and exhibit are true and correct to the best of my knowledge and belief.

Mary L. Pavlik  
Mary L. Pavlik

SUBSCRIBED AND SWORN before me this 9th day of April, 1998.

Mary H. Fladmark  
Notary Public



1 **Identification of Affiant**

2 My name is Mary Pavlik. I am employed by U S WEST Communications  
3 Group, Inc. ("U S WEST")<sup>1</sup> Wholesale Division as Manager, Product and Market  
4 Management. My business address is 150 South 5th Street, Room 540,  
5 Minneapolis, Minnesota.

6 I earned a Bachelor of Science degree in Paralegal Studies from College of  
7 Saint Mary, Omaha, Nebraska. I also earned a Juris Doctor degree from William  
8 Mitchell College of Law in Saint Paul, Minnesota, where I graduated in 1997.

9 I have worked for U S WEST for 27 years. I began my career with  
10 Northwestern Bell as a service representative. From 1974 until 1984 I developed  
11 business office methods and procedures and prepared nonrecurring costs for  
12 pricing. In 1984, I joined U S WEST's Carrier Marketing Division. During the last  
13 13 years, I was product manager for wholesale billing, collections, and information  
14 products.

15 **Purpose of Affidavit**

16 The purpose of my affidavit is to demonstrate to the Commission that  
17 U S WEST has satisfied the checklist requirements for access to directory  
18 assistance service (directory assistance), operator call completion services  
19 (operator services), and white pages directory listings (directory listings).  
20 Specifically, my affidavit will provide facts and data describing how U S WEST  
21 makes these services available to CLECs in Arizona. Because U S WEST  
22 provides access to directory assistance, operator services and directory listings to  
23 CLECs in conformance with the requirements of the Telecommunications Act of

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<sup>1</sup> In my affidavit, all references to U S WEST Communications Group, Inc., or to U S WEST, refer exclusively to the U S WEST Communications Group, Inc., and have no connection to the U S WEST Media Group or its subsidiaries.

1 1996 (Act), the Commission should find that U S WEST has satisfied checklist  
2 items 7(II) and 7(III) and checklist item 8.

3 **Executive Summary**

4 U S WEST has satisfied the requirements of the Act for access to directory  
5 assistance, operator services, and directory listings that are prerequisites for  
6 U S WEST's entry into the interLATA long distance market in Arizona. These  
7 requirements are met through the various interconnection and resale agreements  
8 between U S WEST and CLECs in Arizona.

9 A CLEC may purchase directory assistance and operator services from  
10 U S WEST or another third party, or it may provide its own services. The CLEC's  
11 customer, like the U S WEST customer, can dial 411 or 1+411 to access  
12 U S WEST's directory assistance and can dial "O" and "O+" to access  
13 U S WEST's operator services. In addition, a CLEC may 'brand' U S WEST's  
14 directory assistance and operator services with its unique brand identity.

15 U S WEST makes access to directory listings available to CLECs in  
16 conformance with the requirements of the Act through its listings service offering.  
17 Listings service includes: 1) placing CLEC end user listings in U S WEST's listing  
18 database, 2) updating U S WEST's directory assistance records consistent with  
19 the CLEC's direction for use of such listing information, and 3) furnishing listings  
20 to DEX and other directory publishers for use in publishing local directories, again  
21 consistent with the CLEC's direction for use of such listing information. In 1997  
22 and 1998, U S WEST processed CLEC listing orders for approximately 2430  
23 directory listings which appeared in U S WEST local directories in Arizona.

1 **CHECKLIST ITEM 7 – DIRECTORY ASSISTANCE AND**  
2 **OPERATOR SERVICES**

3 Section 271(c)(2)(B)(vii) of the Act requires:

4 Nondiscriminatory access to . . . (II) directory assistance  
5 services to allow the other carrier's customers to obtain  
6 telephone numbers; and (III) operator call completion services.

7 **A. Directory Assistance**

8 Directory assistance is used by a customer to request the telephone  
9 number of another telephone subscriber. A CLEC may order directory assistance  
10 from U S WEST, or another third party provider, or it may provide its own directory  
11 assistance. When the CLEC orders directory assistance from U S WEST, the  
12 CLEC's customers have access to Arizona listings that reside on U S WEST's  
13 directory assistance database.

14 A CLEC may order directory assistance under its interconnection  
15 agreement with U S WEST in Arizona. Exhibit MLP-1 includes a list of CLECs  
16 that purchase directory assistance from U S WEST. Exhibit MLP-2 includes  
17 U S WEST directory assistance prices. A customer of a CLEC that resells  
18 U S WEST services ("reseller CLEC") like a customer of U S WEST, dials 411 or  
19 1+411 to access U S WEST directory assistance. Alternatively, a reseller CLEC,  
20 or a CLEC that purchases unbundled switching, may order a third party's directory  
21 assistance service or may self-provision the service through the use of customized  
22 routing. In such cases, a separate trunk "custom routes" the reseller CLEC  
23 customer's call from U S WEST's end office switch to the designated CLEC or  
24 third party directory assistance platform.

25 A customer of a CLEC that provides facilities-based services ("facility-  
26 based CLEC") dials a number selected by the CLEC to access U S WEST's  
27 directory assistance. This number may be the same as that used by the  
28 U S WEST customer or reseller CLEC customer.





1

**D. Operator Services Branding**

2 CLECs may brand U S WEST operator services calls to "O" and "O+".  
3 Modifications must be made to U S WEST's operator services platform to enable  
4 U S WEST to store and activate the CLEC's brand announcement.

5 Examples of branding are "Thank you for using U S WEST" and "Thank  
6 you for using (CLEC name)."

7 The price to establish branding will be determined on an individual case  
8 basis. The price will recover the cost incurred by U S WEST to implement the  
9 CLEC's request. In addition to the price for branding, a reseller CLEC or CLEC  
10 that purchases unbundled switching may incur charges for custom routing and  
11 unbundled dedicated interoffice facilities.

12

**E. Busy Line Verify and Busy Line Interrupt**

13 A facility-based CLEC may access U S WEST's Busy Line Verify and Busy  
14 Line Interrupt offerings. The CLEC operator may request, on behalf of its  
15 customer, that the U S WEST operator verify whether a U S WEST customer line  
16 is busy, or may request, on behalf of its customer, that the U S WEST operator  
17 interrupt a busy line.

1     **CHECKLIST ITEM 8 - DIRECTORY LISTINGS**

2             Section 271(c)(2)(B) of the Act requires that:

3                     access or interconnection provided by a Bell operating company  
4                     to other telecommunications carriers include . . . (viii) White  
5                     pages directory listings for customers of the other carrier's  
6                     telephone exchange service.

7             U S WEST satisfies this requirement through provision of access to  
8     directory listings as represented in its interconnection agreements with CLECs in  
9     Arizona. For example, the AT&T agreement states at 44.1.2:

10                    U S WEST shall include in its master Directory Listing database  
11                    all listing information for AT&T Customers.

12     The AT&T agreement states at 44.1.4:

13                    AT&T Customer Listings in the U S WEST Directory Assistance  
14                    database and Directory Listing database shall be co-mingled with  
15                    Listings of U S WEST and other CLEC customers.

16             Listings service includes: 1) placing CLEC end user listings in U S WEST's  
17     listing database, 2) updating U S WEST's directory assistance records consistent  
18     with the CLEC's direction for use of such listing information, and 3) furnishing  
19     listings to DEX and other directory publishers for use in publishing local  
20     directories, consistent with the CLEC's direction for use of such listing information.

21             In 1997 and 1998, U S WEST processed CLEC listing orders for  
22     approximately 2,430 directory listings which appeared in U S WEST local  
23     directories in Arizona. Exhibit MLP-4 includes lists of (1) CLECs that have  
24     ordered listings service from U S WEST and (2) CLECs that have not ordered  
25     listings service from U S WEST.

26             Primary listings include basic customer information such as name, address  
27     and telephone number. Residence primary listings are included in the white

1 pages of the local directory. Business primary listings are included in the white  
2 pages and in the yellow pages of the local directory under the appropriate yellow  
3 pages heading.

4 Premium listings include, but are not limited to, additional listings for other  
5 household or business members, cross reference listings and listings from other  
6 cities. Premium listings may be placed in U S WEST's directory assistance  
7 records and in the local directories at the customer's request.

8 There are two types of privacy listings -- non-listed and non-published  
9 listings. Non-listed listings are available on U S WEST directory assistance  
10 records, but are not published in local directories. Non-published listings are  
11 omitted from both U S WEST directory assistance records and from local  
12 directories.

13 A CLEC may include its customers' listings in U S WEST's listing database.  
14 The CLEC will prepare listing orders and send them to U S WEST to update the  
15 listing database with end users' names, addresses and telephone numbers. A  
16 CLEC order must pass several check points before a listing is published in a  
17 directory or included on U S WEST directory assistance records. First, to ensure  
18 that all required information is present, U S WEST manually reviews all CLEC  
19 listing orders prior to entry into the listing database. Next, when entered into the  
20 database, all listings are mechanically edited for accuracy and completeness.  
21 Finally, listings which are rejected are manually corrected and reentered into the  
22 database.

23 Prior to production of the local directory, a CLEC may request a verification  
24 proof of the CLEC's end user listings. Upon receipt of a request for verification  
25 proof, U S WEST will furnish the CLEC with a report of all CLEC end user listings  
26 which are scheduled for inclusion in the local directory. The CLEC may then  
27 provide any additions or corrections to U S WEST prior to printing the directory.

1 U S WEST includes all primary listings in its listing database at no charge  
2 to the CLEC. Premium and privacy listings may be purchased by the CLEC at  
3 18% off the retail tariff rate.

4 Any revenue resulting from the sale of listings to directory publishers  
5 belongs solely to U S WEST. A CLEC may choose to have U S WEST include  
6 CLEC end user listings into the listings sold by U S WEST to directory publishers,  
7 or the CLEC may contract directly with the directory publisher(s) for the sale of  
8 CLEC listings.

9 **CONCLUSION**

10 CLECs may purchase directory assistance and operator services from  
11 U S WEST or another third party, or they may provide their own services. CLECs  
12 may offer their customers the same dialing pattern used by U S WEST customers  
13 to access U S WEST directory assistance and operator services. CLECs may  
14 access the same database that U S WEST uses for obtaining directory assistance  
15 information. CLECs may brand directory assistance and operator services where  
16 technically feasible. Because U S WEST provides nondiscriminatory access to  
17 directory assistance and operator services in conformance with the Act, the  
18 Commission should find that U S WEST has satisfied checklist item 7(II) and  
19 checklist item 7(III).

20 U S WEST provides CLECs with access to directory listings in conformance  
21 with the requirements of the Act. U S WEST's listings service includes: 1) placing  
22 CLEC end user listings in U S WEST's listing database, 2) updating U S WEST's  
23 directory assistance records consistent with the CLEC's direction for use of such  
24 listing information, and 3) furnishing listings to DEX and other directory publishers  
25 for use in publishing local directories, consistent with the CLEC's direction for use  
26 of such listing information. In 1997 and 1998, U S WEST processed CLEC listing  
27 orders for approximately 2,430 directory listings which appeared in U S WEST

1 | local directories in Arizona. U S WEST includes all primary listings in its listing  
2 | database at no charge to the CLEC. Because U S WEST provides listings to  
3 | CLECs in conformance with the requirements of the Act, the Commission should  
4 | find that U S WEST has satisfied checklist item 8.

5 | Further your affiant sayeth not.

Arizona Corporation Commission  
Docket No. U-0000-97-238  
U S WEST Communications, Inc.  
April 13, 1998

**EXHIBITS OF**  
**MARY L. PAVLIK**

**Table of Exhibits**

CLECs That Order Directory Assistance and Operator Services	Exhibit MLP-1
U S WEST Directory Assistance Prices	Exhibit MLP-2
U S WEST Operator Services Prices	Exhibit MLP-3
U S WEST Listings Service	Exhibit MLP-4

Arizona Corporation Commission  
Docket No. U-0000-97-238  
U S WEST Communications, Inc.  
April 13, 1998

**EXHIBIT MLP-1**

**CLECS THAT ORDER**

**DIRECTORY ASSISTANCE and OPERATOR SERVICES**

RESELLER CLECS

FACILITY-BASED CLECS

**CONFIDENTIAL INFORMATION**

**EXHIBIT MLP-2**

**U S WEST DIRECTORY ASSISTANCE PRICES**

<u>SERVICE</u>	<u>RESELLER CLECS</u>	<u>FACILITY-BASED CLEC</u>
DIRECTORY ASSISTANCE	18% off of Retail Rate	\$ .28 per call
BRANDING	Individual Case Basis	Individual case basis

**EXHIBIT MLP-3**

**U S WEST OPERATOR SERVICES PRICES**

OPTION A: PRICE PER MESSAGE

<u>SERVICE</u>	<u>RATE</u>
Operator Handled Calling Card	\$ .46
Machine Handled Call	\$ .18
Station to Station Call	\$ .84
Person to Person Call	\$2.05
Connect to Directory Assistance	\$ .55
Busy Line Verify	\$ .72
Busy Line Interrupt	\$ .87
Operator Assistance	\$ .36

OPTION B: PRICE PER WORK SECOND

<u>SERVICE</u>	<u>PRICE</u>
Operator Handled	\$.02
Machine Handled	\$.13

**EXHIBIT MLP-4**

**CLECS THAT ORDER LISTINGS SERVICE**

RESELLER CLECS

FACILITY-BASED CLECS

**CLECS THAT HAVE NOT ORDERED LISTINGS SERVICE**

RESELLER CLECS

FACILITY-BASED CLECS

**CONFIDENTIAL INFORMATION**

AFFIDAVIT  
OF  
GIBSON

**BEFORE THE ARIZONA CORPORATION COMMISSION**

**JAMES M. IRVIN**  
Chairman  
**RENZ D. JENNINGS**  
Commissioner  
**CARL J. KUNASEK**  
Commissioner

<b>IN THE MATTER OF U S WEST</b>	)	<b>Docket No. U-0000-97-238</b>
<b>COMMUNICATIONS, INC'S</b>	)	
<b>COMPLIANCE WITH § 271 OF THE</b>	)	<b>U S WEST COMMUNICATIONS,</b>
<b>TELECOMMUNICATIONS ACT OF</b>	)	<b>INC'S FIRST PARTIAL</b>
<b>1996</b>	)	<b>COMPLIANCE FILING</b>
<hr/>		

**7(I). ACCESS TO 911/E911 SERVICE**

**and**

**10. UNBUNDLED SIGNALING AND DATABASES**

**April 13, 1998**

STATE OF COLORADO        )  
  )  
  ) SS.  
COUNTY OF JEFFERSON    )

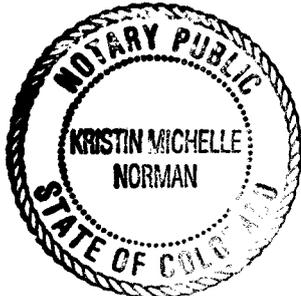
**AFFIDAVIT OF LEILA A. GIBSON**

Leila A. Gibson, being first duly sworn, states as follows:

1. My name is Leila A. Gibson. I am Manager-Interconnection Negotiations of U S WEST Communications, Inc. in Littleton, Colorado.
2. Attached hereto and made a part hereof for all purposes is my affidavit consisting of pages numbered 1 through 18, and Exhibits LAG-1, LAG-2, LAG-3, and LAG-4.
3. I hereby swear and affirm that the statements and data contained in the attached affidavit and exhibit are true and correct to the best of my knowledge and belief.

  
Leila A. Gibson

SUBSCRIBED AND SWORN before me this 9<sup>th</sup> day of April, 1998.



  
Notary Public

My Commission Expires 6-20-98

1     **Identification of Affiant**

2           My name is Leila A. Gibson. I am employed by U S WEST  
3     Communications ("U S WEST) as a Manager-Interconnection Negotiations. My  
4     business address is 700 W. Mineral Avenue, Room MNF20.16, Littleton,  
5     Colorado 80120.

6           I have 27 years of experience in the telecommunications industry in  
7     network engineering and planning. My current responsibilities include serving as  
8     an internal company subject matter expert on network interconnection changes  
9     resulting from state specific rulings and the Telecommunications Act of 1996  
10    (Act). I provide technical support in local interconnection contract negotiations  
11    and develop interconnection arrangements and strategies to be implemented by  
12    U S WEST.

13    **Purpose of Affidavit**

14           The purpose of this affidavit is to demonstrate that U S WEST has  
15    satisfied two of the checklist requirements that have been established as a  
16    prerequisite of U S WEST's entry into the interLATA long distance market in  
17    Arizona. Specifically, I address checklist item vii(I) – Nondiscriminatory access  
18    to 911 and E911 services, and checklist item (x) – Nondiscriminatory access to  
19    databases and associated signaling necessary for call routing and completion. I  
20    provide an overview of the efforts that U S WEST has made to meet these  
21    checklist requirements as found in Section 271 of the Act and the related FCC  
22    regulations. I also review interconnection agreements, approved by the Arizona  
23    Corporation Commission, that have been reached between U S WEST and  
24    CLECs in Arizona and how those agreements are in conformance with the above  
25    checklist requirements.

1 **Executive Summary**

2           The Telecommunications Act of 1996 establishes several requirements  
3 for U S WEST's entry into the interLATA long distance market in Arizona. Two  
4 of those checklist requirements are checklist item vii(l) – Nondiscriminatory  
5 access to 911 and E911 services, and checklist item (x) – Nondiscriminatory  
6 access to databases and associated signaling necessary for call routing and  
7 completion. U S WEST provides such access to 911/E911, databases and  
8 signaling through the interconnection agreements with CLECs in Arizona.

9           This affidavit provides an overview of the efforts that U S WEST has  
10 made to meet these checklist requirements as found in Section 271 of the Act  
11 and the related FCC regulations. This affidavit also provides a review of the  
12 relevant portions of the various interconnection agreements that have been  
13 reached between U S WEST and CLECs in Arizona and how those agreements  
14 are in conformance with the above checklist requirements. Finally, this affidavit  
15 demonstrates that U S WEST has satisfied checklist items vii(l) and x for access  
16 to 911/E911, and databases and associated signaling.

1 **CHECKLIST ITEM 7(I) -- ACCESS TO 911/E911 SERVICE**

2 **Overview**

3 The Act requires U S WEST to provide “non-discriminatory access to 911  
4 and E911 services.”<sup>1</sup> The FCC has required that access to 911 services be  
5 available as a part of unbundled local switching.<sup>2</sup> U S WEST provides such  
6 access as a part of unbundled local switching and resale, according to the terms  
7 of the various interconnection agreements.

8 Basic 911 (911) routes a customer’s 911 calls directly from the customer’s  
9 end office switch to the Public Safety Answering Point (PSAP). Enhanced 911  
10 (E911) also provides the ability for the PSAP to receive the name and address of  
11 the calling party, also known as Automatic Location Identification (ALI)  
12 information. Another feature of E911 is the U S WEST selective router that  
13 enables 911 calls to be routed to the appropriate PSAP based on the calling  
14 party’s telephone number, also known as Automatic Number Identification (ANI).  
15 E911 service provided by U S WEST utilizes the ALI database which stores the  
16 telephone number, name and address of each customer. The ALI database is  
17 managed by SCC, a third party database manager that provides 911 database  
18 management services for U S WEST and other local exchange carriers.

19 **911/E911 Trunking**

20 The provision of 911/E911 differs somewhat for CLECs reselling  
21 U S WEST’s retail services, facility-based CLECs operating their own switch, and  
22 facility-based CLECs using U S WEST’s unbundled local switching.

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<sup>1</sup> See Section 271(c)(2)(B)(vii)(I) of the Act.

<sup>2</sup> First Interconnection Order at para. 412.

1 CLECs that resell U S WEST's retail services, will obtain Basic or  
2 Enhanced 911 service under the same terms and conditions that such services  
3 are available to U S WEST's retail customers.

4 In a typical basic 911 arrangement, a facility-based CLEC establishes 911  
5 trunks from its switch directly to the PSAP. Each 911 call is forwarded by the  
6 CLEC over these 911 trunks to the PSAP, whose attendants answer the  
7 emergency calls. There is no direct involvement by U S WEST in such an  
8 arrangement, although, if requested by the CLEC, U S WEST will provide the  
9 911 trunks between the CLEC switch and the PSAP.

10 In a typical E911 arrangement, a CLEC establishes E911 trunks from its  
11 switch directly to the U S WEST selective router. On each E911 call, the CLEC  
12 switch must forward the Automatic Number Identification (ANI) of the calling  
13 party to the U S WEST selective router. Using the ANI, the selective router  
14 refers to its selective routing table, which returns the identity of the police or  
15 sheriff emergency dispatch center for the CLEC's customer. The selective router  
16 then forwards the E911 call along with the calling party's ANI to the appropriate  
17 PSAP. The PSAP controller forwards the ANI to the ALI database, which returns  
18 the calling party's name and address. The PSAP then uses this information in  
19 responding to the emergency call. This E911 call process for interconnection of  
20 the CLEC network with the U S WEST E911 selective router is diagrammed in  
21 Exhibit LAG-1.

22 CLECs who obtain unbundled switching will use the same 911/E911  
23 trunks from the U S WEST end office switch to the PSAP or selective router that  
24 are utilized for 911 calls from U S WEST customers.

25 Basic 911 and E911 services are provided in Arizona. U S WEST has  
26 three (3) selective routers installed, providing E911 interconnection

1 arrangements for nine (9) CLECs.<sup>3</sup> These facility based CLECs, operating their  
2 own switches, have established 911/E911 trunks from their switch to the  
3 U S WEST selective router.

4 Where E911 has been implemented, facility-based CLECs operating their  
5 own switches may either establish their own facilities to the U S WEST selective  
6 router or they may obtain facilities from U S WEST. Once the facilities are in  
7 place, U S WEST will provide 911 trunk terminations at the selective router.

8 The routing of a 911/E911 call from a U S WEST end office is virtually the  
9 same as the routing of a call from a CLEC operating its own switch.  
10 U S WEST's end office is connected to the U S WEST selective router or directly  
11 to the PSAP in the same manner as a CLEC switch is connected. The routing of  
12 U S WEST's calls and a CLEC's calls is the same except that each switch -  
13 whether a CLEC or U S WEST switch - requires separate trunk groups to the  
14 selective router or PSAP.

15 For CLECs requiring interconnection at a U S WEST selective router,  
16 U S WEST will provide trunks sufficient to achieve an engineered 1% blocking  
17 rate to permit the CLEC the same level of service experienced on equivalent  
18 U S WEST E911 trunk groups.

19 U S WEST monitors trunks from its end offices to the selective router in its  
20 monthly studies for performance quality to determine if sufficient trunks are in  
21 place to handle the call volume. Such studies are performed at the originating  
22 central office to determine the number of 911 calls generated and the rate of  
23 blocking, if any. This data is shared and discussed with the PSAP operator to  
24 mutually agree on the 911 trunk group sizing requirements.

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<sup>3</sup> See Exhibit LAG - 4 for a list of CLECs with access to 911/E911 services in Arizona.

1 CLECs connecting their switches to a U S WEST selective router are  
2 responsible for monitoring trunk performance levels from their switches as a part  
3 of routine maintenance. Similarly, CLECs work with the PSAP or responsible  
4 agency to determine trunk group sizing. If it is determined that trunk quantities  
5 are insufficient to handle the call volume between the CLEC switch and the  
6 U S WEST selective router, the CLEC will request U S WEST to install additional  
7 911 trunks at the selective router to alleviate any performance issues. Trunk  
8 additions at the selective router for CLECs are made on the same terms that  
9 U S WEST adds 911 trunks for itself.

10 Before any 911/E911 trunk can be deactivated by a U S WEST employee,  
11 the U S WEST 911 Care Center in Minneapolis must first verify that a valid  
12 deactivation service order request has been submitted by the CLEC. These  
13 deactivation procedures apply uniformly to both U S WEST and CLEC 911/E911  
14 trunks.

15 **E911 ALI Database Management**

16 The ALI database is managed by a third party database manager -- SCC.  
17 The database contains end user name, address and telephone number  
18 information, and designates the appropriate PSAP for each address. The ALI  
19 database is used for the provision of E911 service. For Basic 911 service, no  
20 ALI database is required. ALI database record management differs somewhat  
21 for CLECs reselling U S WEST's retail services, facility-based CLECs operating  
22 their own switch, and facility-based CLECs using U S WEST's unbundled local  
23 switching.

24 For resale services, U S WEST updates the E911 database on the same  
25 schedule and timeframes as it updates the records of its own retail customers.  
26 CLEC resellers may place their orders electronically or by facsimile to start the  
27 service order process. E911 database entries for resold services flow directly

1 from U S WEST to SCC in the same way U S WEST retail customer updates  
2 flow to SCC.

3 Since all records, whether for resold services or for U S WEST's own  
4 retail customers, are processed in the same manner, it is not possible at this  
5 time for SCC to distinguish the CLEC records from the U S WEST records.

6 U S WEST assigns a unique resale identifier, the "RSID", to resold service  
7 records for internal use. U S WEST has requested SCC to recognize the RSID  
8 as a means to sort these database entries for comparison purposes.

9 Until the RSID identifier for resold services is available through SCC, a  
10 CLEC may request a non-routine audit on selected CLEC records. This  
11 procedure will be utilized until CLEC records for resold services can be uniquely  
12 identified in the database for reporting purposes.

13 The E911 database entry will generally be unchanged when the end user  
14 changes service providers. An edit function in the service order process gives  
15 U S WEST the ability to determine errors and to check the accuracy of the  
16 customer record data prior to processing. For example, when an end user  
17 changes service providers through resale, a comparison is made on the  
18 customer's address information, telephone prefix and class of service for  
19 consistency to ensure the record can be loaded into the E911 database in a  
20 timely and accurate fashion.

21 If an error made by the CLEC is detected by U S WEST, an attempt will  
22 be made to correct it or return the service order to the CLEC. Although the error  
23 affects the 911 database, the provisioning of that order is not affected. The  
24 customer will still receive service and will be able to make calls to the 911  
25 system.

1           If there is a delay in changing the responsible party in the 911 database,  
2 the customer's E911 service will continue uninterrupted when they change from  
3 one service provider to another.

4           A facility-based CLEC must directly provide to SCC the customer name,  
5 address and telephone number associated with each of the CLEC's telephone  
6 numbers. These updates may be made through direct connections or through  
7 other arrangements as negotiated by the CLEC and SCC. SCC loads this  
8 information into its ALI Database Management System. SCC also provides  
9 CLECs and U S WEST with the Master Street Address Guide (MSAG). The  
10 MSAG provides the listing of the permissible ranges of addresses that are  
11 associated with each street within a particular jurisdiction. U S WEST and  
12 CLECs can avoid entering an invalid address in the ALI database by ensuring  
13 ALI database entries are in conformance with the MSAG.

14           In the case of facility-based CLECs, SCC will interface directly with the  
15 CLEC to resolve record errors. Facility-based CLECs will receive their own  
16 database errors directly from SCC, where analysts are available to CLECs to  
17 reconcile all error files and disputes during normal business hours of operation.

18           For a facility-based CLEC utilizing unbundled switching, U S WEST has  
19 no customer name or address information for the unbundled switch port. The  
20 CLEC must therefore make an arrangement with SCC to enter the CLEC's end  
21 user data into the ALI database as if the CLEC owned its own switch.  
22 U S WEST has no control over the timeframes that the E911 database entries  
23 are made to SCC. Those entries are the sole responsibility of the CLEC.

24           SCC utilizes industry standard formats for the exchange of E911 customer  
25 records.

26           U S WEST and SCC utilize the record format as defined in Version 2 of  
27 the National Emergency Number Association (NENA) Recommended Protocols

1 for Data Exchange 02-001. U S WEST assumes that facility based CLECs will  
2 establish similar arrangements with SCC for the exchange of record information.

3 SCC provides a variety of products and services to the industry. It is my  
4 understanding that Ameritech, BellSouth, Bell Atlantic and Pacific Bell have  
5 utilized or trialed the services of SCC.

6 A CLEC and SCC may negotiate a variety of methods to exchange 911  
7 customer data records. It is my understanding that if a dial up connection to  
8 SCC is used for the exchange of this information, the interface will be at SCC's  
9 location in Boulder, Colorado.

10 NENA is revising industry standards for E911 database updates.<sup>4</sup> A  
11 revision planned for the E911 database includes the addition of a unique  
12 company identifier with each customer record for proper identification of the  
13 company responsible for the maintenance of the customer record.<sup>5</sup> It is  
14 envisioned that customer records in the 911 database will not be changed unless  
15 SCC has authorization from the responsible telephone company as well as  
16 receipt of a new database entry from the end user's new telephone company.

17 It is essential that the accuracy of customer records within the 911  
18 database be maintained, and that the company responsible for the integrity of  
19 those records be identified. The above procedures will protect the records from  
20 being inadvertently or purposefully changed by another company. While in most  
21 cases the customer name, address, and telephone number will not change when  
22 changing service providers, in other cases customer data will change. The  
23 above procedures are intended to prevent changes, removal or modification of

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<sup>4</sup> See NENA Recommended Protocols for Data Exchange 02-001, Version 3 to be published in mid-1998. It is U S WEST's plan to implement NENA recommendations.

<sup>5</sup> U S WEST will comply with the population of the NENA company identifier when the technical interface capability is available.

1 data without authorization from the present serving company as customers  
2 switch service providers. The company identifier will also provide the PSAP a  
3 service provider referral source for additional record information.

4 **Cost Recovery**

5 911/E911 services offered by U S WEST to other carriers (including  
6 independent telephone companies) do not traditionally involve payments  
7 between the carriers. The contracts negotiated in Arizona do not provide any  
8 charges for CLECs to access 911 service or for 911/E911 trunking facilities.  
9 However, the management of the E911 database will be performed by SCC --  
10 who may assess charges to both U S WEST and CLECs for updates to the E911  
11 database and for other services, such as providing copies of the Master Street  
12 Address Guide.

13 U S WEST will bill the PSAP operator for the cost of its portion of the  
14 service. U S WEST presumes CLECs will bill the PSAP operator to recover their  
15 portion of the costs of providing 911/E911. U S WEST bills its customers a  
16 911/E911 surcharge which is remitted to the State of Arizona, Department of  
17 Administration. U S WEST presumes that CLECs will bill a similar surcharge to  
18 their customers on behalf of the PSAP operator.

19 **Summary**

20 In accordance with the interconnection agreements approved by the  
21 Arizona Corporation Commission, U S WEST has provided access to 911/E911  
22 interconnection to resellers and facility-based CLECs.<sup>6</sup>

23 To my knowledge, U S WEST has not received any complaints from  
24 CLECs in Arizona regarding U S WEST's provision of this checklist item.

1 **CHECKLIST ITEM 10 -- UNBUNDLED SIGNALING AND DATABASES**

2 The Act requires that U S WEST provide “nondiscriminatory access to  
3 databases and associated signaling necessary for call routing and completion.”<sup>7</sup>  
4 Section 251(c)(3) requires the unbundling of network elements where technically  
5 feasible. A network element is “a facility or equipment used in the provision of a  
6 telecommunications service. Such term also includes features, functions, and  
7 capabilities that are provided by means of such facility or equipment, including ...  
8 databases, [and] signaling systems ... used in the transmission, routing, or other  
9 provision of a telecommunications service.”<sup>8</sup>

10 The FCC has established requirements regarding access to U S WEST’s  
11 signaling system, call related databases, including Line Information Database  
12 (LIDB), 800/888, Advanced Intelligent Network (AIN), and number portability  
13 databases, and access to the Service Management System (SMS), which  
14 facilitates the entry of data into these call-related databases. The FCC has also  
15 established requirements regarding the protection of the privacy of customer  
16 records in those databases. In summary, the FCC has ruled that when  
17 requested, incumbent LECs must provide:

- 18 • nondiscriminatory access to their signaling links and Signaling  
19 Transfer Points (STPs) on an unbundled basis.<sup>9</sup>
- 20 • nondiscriminatory access on an unbundled basis to their call-  
21 related databases for the purpose of switch query and database  
22 response through the SS7 network, e.g. LIDB, the Toll Free Calling  
23 Database and Number Portability downstream databases, by

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6 See Exhibit LAG - 4 for a listing of the CLECs with access to 911/E911 services in Arizona.

7 See Section 271(c)(2)(B)(x) of the Act.

8 Section 251(c)(3) of the Act.

9 First Interconnection Order at para. 479.

1 means of physical access at the STP linked to the unbundled  
2 database.<sup>10</sup>

3 • access to AIN databases via an STP for those call-related  
4 databases used in the incumbent LEC's AIN.<sup>11</sup>

5 • access to call-related databases and the service management  
6 system in a manner that follows requirements for privacy of  
7 information as defined in Section 222 of the Act.<sup>12</sup>

8 • access, on an unbundled basis, to the SMS, to create, modify, or  
9 update information in call-related databases.<sup>13</sup>

10 The unbundling of the signaling network is depicted in Exhibit LAG-2.

### 11 **Unbundled Signaling**

12 Signaling is the exchange of call control information between switching  
13 elements of a telecommunications network. The U S WEST SS7 signaling  
14 network, also known as the common channel signaling network, is a packet  
15 switched communication network that allows call control messages to be  
16 transported on a dedicated high-speed data network that is separate and distinct  
17 from the voice communication network. The signaling network facilitates  
18 communication between end office switches, tandem switches, interexchange  
19 carrier switches, CLEC switches and other local exchange carrier switches for  
20 the purpose of establishing voice grade trunk connections. The signaling  
21 network also facilitates communication between these switches and the various  
22 call related databases that are associated with the signaling network. For  
23 example, an end office switch may communicate with the 800 database through  
24 the signaling network to acquire the routing information for a particular 800

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<sup>10</sup> First Interconnection Order at para. 484.

<sup>11</sup> First Interconnection Order at para. 486.

<sup>12</sup> First Interconnection Order at para. 492.

<sup>13</sup> First Interconnection Order at para. 493.

1 telephone number. Likewise, an operator system may communicate with a LIDB  
2 to validate billing information on an operator handled, collect or calling card call.

3 CLECs may interconnect to the U S WEST signaling network through the  
4 use of U S WEST's unbundled signaling service offering. U S WEST provides  
5 unbundled signaling through the following unbundled network elements:

- 6 • **STP Port** - The STP is the "tandem switch" of the signaling  
7 network. It routes signaling traffic between end offices, tandem  
8 switches and call-related databases. The STP Port element  
9 provides the switching function at the STP. One STP Port is  
10 required for each CLEC provisioned or U S WEST provisioned  
11 signaling link.
- 12 • **Entrance facility** - This element connects the CLEC's Signaling  
13 Point of Interface with the U S WEST Serving Wire Center (SWC).  
14 A CLEC may purchase this transport element from U S WEST or  
15 another provider, or may self-provision the entrance facility. If the  
16 entrance facility is self-provisioned, the CLEC would need to  
17 purchase collocation and an expanded interconnection channel  
18 termination.
- 19 • **Direct Link Transport (DLT)** - This element connects the SWC to  
20 the U S WEST STP. The CLEC may purchase this element, or  
21 may self-provision transport directly to the STP location. If the  
22 CLEC provides the signaling link to the STP location, it must  
23 purchase collocation, an expanded interconnection channel  
24 termination (EICT) and zero mile direct link transport (DLT) at the  
25 STP location.

26 CLECs may access the U S WEST signaling network through the above  
27 elements to facilitate signaling between their switches and U S WEST end office

1 and tandem switches. The signaling network can also be used for signaling to  
2 other carrier switches via the U S WEST signaling network. Unbundled signaling  
3 also allows a CLEC to access the call-related databases, such as the Line  
4 Information Database (LIDB), the 800/888 Database, AIN and, in the future, the  
5 number portability database. CLECs may also interconnect with the U S WEST  
6 signaling network through the use of a third party hub provider, or an  
7 interexchange carrier acting as a hub provider.

8 The rates for unbundled signaling and call-related databases are  
9 described in Exhibit LAG-3.

#### 10 **Database Access**

11 The LIDB (Line Information Database) provides screening and validation  
12 on Alternately Billed Services for operator handled calls, including billed-to-third,  
13 collect, and calling card calls. LIDB also stores the customer name associated  
14 with each telephone number to facilitate the provision of the caller's name to the  
15 called party for caller ID with calling name. The records in LIDB include  
16 U S WEST end user customers, as well as line records of CLECs who may enter  
17 their end user records in U S WEST's LIDB. U S WEST provides access to  
18 LIDB in accordance with the terms of its various interconnection agreements.<sup>14</sup>

19 800/888 database access enables a CLEC to determine where an  
20 originating 800/888 toll-free call should be routed. On such a call, a CLEC will  
21 send the 800-NXX-XXXX or 888-NXX-XXXX telephone number dialed by its end  
22 users to the U S WEST 800/888 database through use of the U S WEST  
23 signaling network. The 800/888 database provides call routing information for  
24 the specific 800 or 888 toll-free telephone number that the CLEC transmitted to  
25 the database. The database transmits the call routing information to the CLEC

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<sup>14</sup> See GST agreement, Section IX, Ancillary Services and Arrangements, Subsection H, Interconnection to the Line Information Database (LIDB).

1 over the same signaling network on which the request was received. The CLEC  
2 uses this routing information to forward the call to the appropriate network for call  
3 completion.

4 U S WEST also provides access to AIN databases. AIN capabilities can  
5 be used to provide enhanced features for an end user. The AIN capabilities are  
6 activated through the use of AIN triggers. A trigger is a place in call processing  
7 where a database query must be made to determine what action must be taken.  
8 For example, an end user on a CLEC switch may establish a restricted calling  
9 list that will not allow calls to be placed from their telephone line to specific  
10 telephone numbers. The list will be stored in an AIN database and an AIN  
11 trigger will be established to notify the call processing equipment to check this list  
12 on every call originated from this end user's line. Then, when a call is originated  
13 from this line, the end office switch will analyze the called telephone number and  
14 find the AIN trigger which will instruct the switch to query an AIN database. A  
15 query will be sent to the designated database and the restricted dialing list will be  
16 reviewed. If the dialed number is on the list, the call will be directed to an  
17 intercept announcement. On the other hand, if the called number is not on the  
18 restricted list, then the call will be forwarded to the appropriate destination for call  
19 completion. Access to U S WEST's AIN databases is provided via the  
20 U S WEST SS7 network.

21 U S WEST will also provide access to the U S WEST local number  
22 portability database, when such a database is deployed. U S WEST will offer  
23 CLECs the option of querying this database in a manner similar to how queries  
24 are provided to other call related databases. Until the number portability  
25 database is deployed, CLECs may purchase interim number portability service  
26 according to the terms of the interconnection agreements.

27 For LIDB service, U S WEST is implementing a service provider identifier  
28 against each end user line record in the database. This identifier will designate

1 the owner of the line record to ensure the records of one provider are not shared  
2 with another provider. LIDB database management is considered a "safe  
3 harbor" in U S WEST. Access to the database is limited to a confined group of  
4 employees responsible for managing the database. By providing only restricted  
5 access to the database, U S WEST ensures that the privacy of customer records  
6 is maintained. LIDB query information is also protected under FCC tariff against  
7 the use of records for any purpose other than call processing. Customer  
8 proprietary information is protected because service providers cannot store or  
9 use this data for marketing or other purposes.

10 The AIN database will also have a unique identifier against each customer  
11 record. The "resporg" identifier will designate the "responsible organization" or  
12 the record owner. As with LIDB, the AIN database is restricted to a confined  
13 group of U S WEST employees, in a safe harbor environment, responsible for  
14 maintaining the database. This restriction is intended to preserve the privacy of  
15 customer records.

### 16 **Service Management System**

17 As required by the First Interconnection Order, U S WEST provides  
18 access, on an unbundled basis, to the U S WEST SMS, which will allow CLECs  
19 to create, modify or update information in U S WEST's call related databases.

20 CLECs may choose to store their end user telephone number information  
21 in the U S WEST LIDB. CLECs may provide line record updates in accordance  
22 with the terms identified in their respective interconnection agreements. For  
23 example, the GST agreement states:

24 Non-USWC companies will submit LIDB updates through the  
25 exchange carrier service center and the LSS service bureau.

1           These two centers enter information into USWC's service order  
2           process interface system, SOPI.<sup>15</sup>

3           The Service Order Provisioning Interface (SOPI) system is the route  
4 U S WEST internal service orders follow to update the LIDB data. CLECs may  
5 also choose to transmit updates to the U S WEST LIDB via an e-mail process.  
6 This process can be used for multiple updates daily. The e-mail files will be  
7 loaded into the Line Validation Administration System (LVAS) which loads data  
8 into the LIDB. Ultimately, LIDB database updates will be accomplished via an  
9 Interconnect Mediated Access (IMA) Web page. Until the IMA Web page is  
10 available, the CLEC may e-mail or fax additions, updates, changes and deletions  
11 for input into the U S WEST LIDB.

12           For AIN services, two steps are involved: AIN Service Creation and  
13 Service Management. For Service Creation, U S WEST provides access to the  
14 Creation Environment, allowing CLECs the use of U S WEST's service  
15 application development process to design, create and test AIN based  
16 services.<sup>16</sup> The elements of service creation and testing are combined to meet  
17 the individual needs of the CLEC. The service logic can be established in the  
18 U S WEST AIN database after Service Creation. Currently the service creation  
19 process is manual, built by a U S WEST technician, and is the same process  
20 used for U S WEST service creation.

21           The Service Management process involves building and maintaining the  
22 CLEC end user line record in the U S WEST AIN database for provisioning and  
23 call processing. The CLEC may populate end user data into an electronic file for  
24 loading by a U S WEST technician into the database. U S WEST is currently

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<sup>15</sup> See GST agreement, Section IX, Ancillary Services and Arrangements, Subsection H, para. D, Interconnection to the Line Information Database (LIDB).

<sup>16</sup> First Interconnection Order at para. 495.

1 developing standards for the development of a gateway or a mediated access  
2 capability to further mechanize the processing of CLEC records.

3 It is my understanding that U S WEST has not been requested to provide  
4 unbundled signaling or database access to a CLEC under the terms of the  
5 interconnection contracts negotiated in the state of Arizona.

6 I am not aware of any performance complaints filed by CLECs regarding  
7 U S WEST's signaling network, databases or service management systems.

8 **Conclusion**

9 U S WEST meets all of the conditions for Section 271(c)(2)(B)(x) relative  
10 to nondiscriminatory access to databases and associated signaling, and Section  
11 251(c)(3) of the Act relative to unbundled signaling. In accordance with the  
12 requirements of Section 271(c)(2)(B)(vii)(I), U S WEST provides CLECs with  
13 non-discriminatory access to Basic and Enhanced 911 services. Such access  
14 ensures that CLECs have the ability to offer their customers the same level of  
15 911/E911 access enjoyed by the customers of U S WEST.

16 Therefore, I recommend that the Commission rule that U S WEST has met the  
17 requirements for compliance with these checklist items.

18 Further your affiant sayeth not.

Arizona Corporation Commission  
Docket No. U-0000-97-238  
U S WEST Communications, Inc.  
April 13, 1998

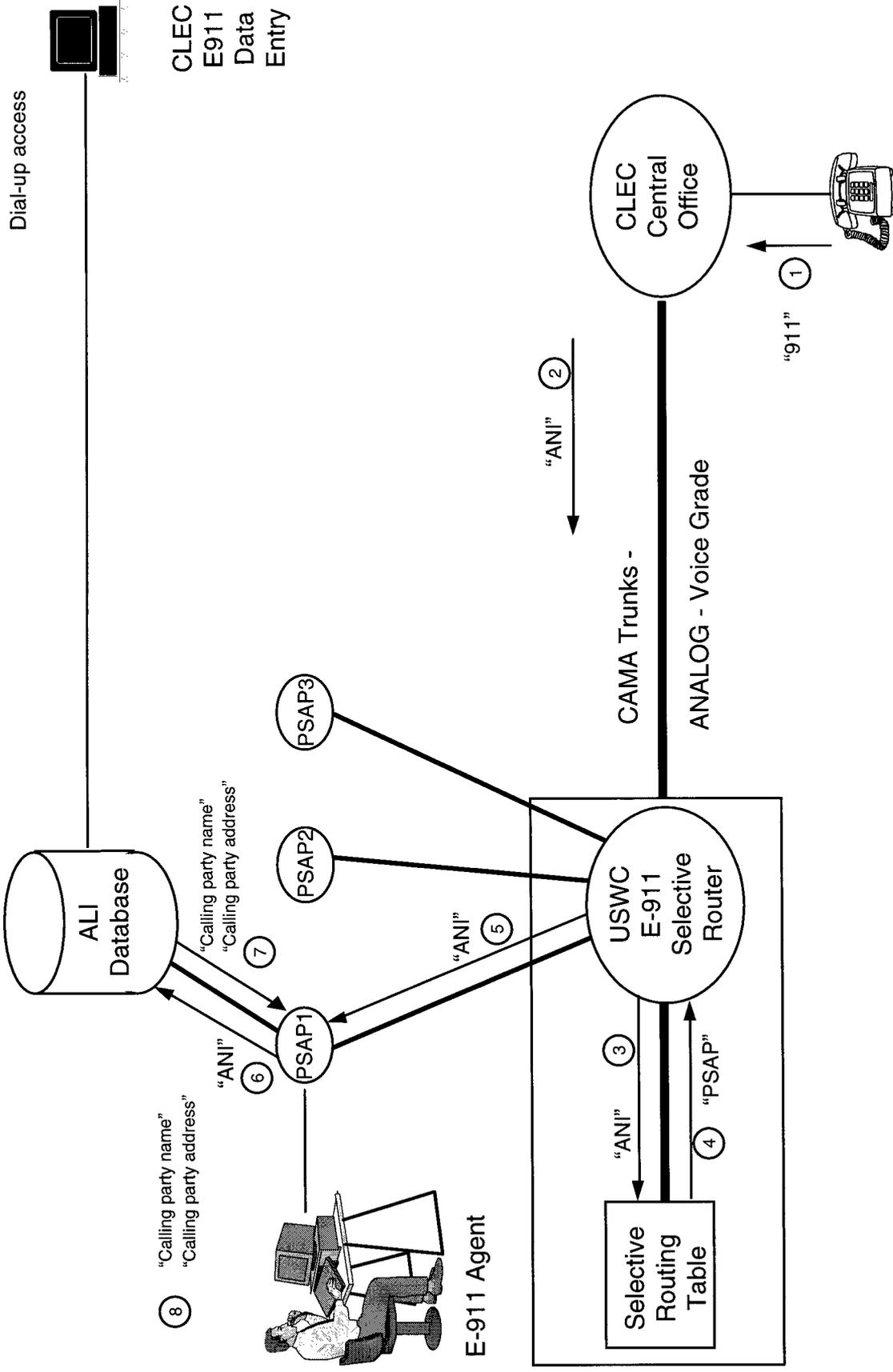
**EXHIBITS OF**  
**LEILA A. GIBSON**

**Table of Exhibits**

E911 Interconnection	Exhibit LAG - 1
Unbundled Signaling Network Diagram	Exhibit LAG - 2
Unbundled Signaling Rates	Exhibit LAG - 3
CLECs with Access to 911/E911 Services	Exhibit LAG - 4

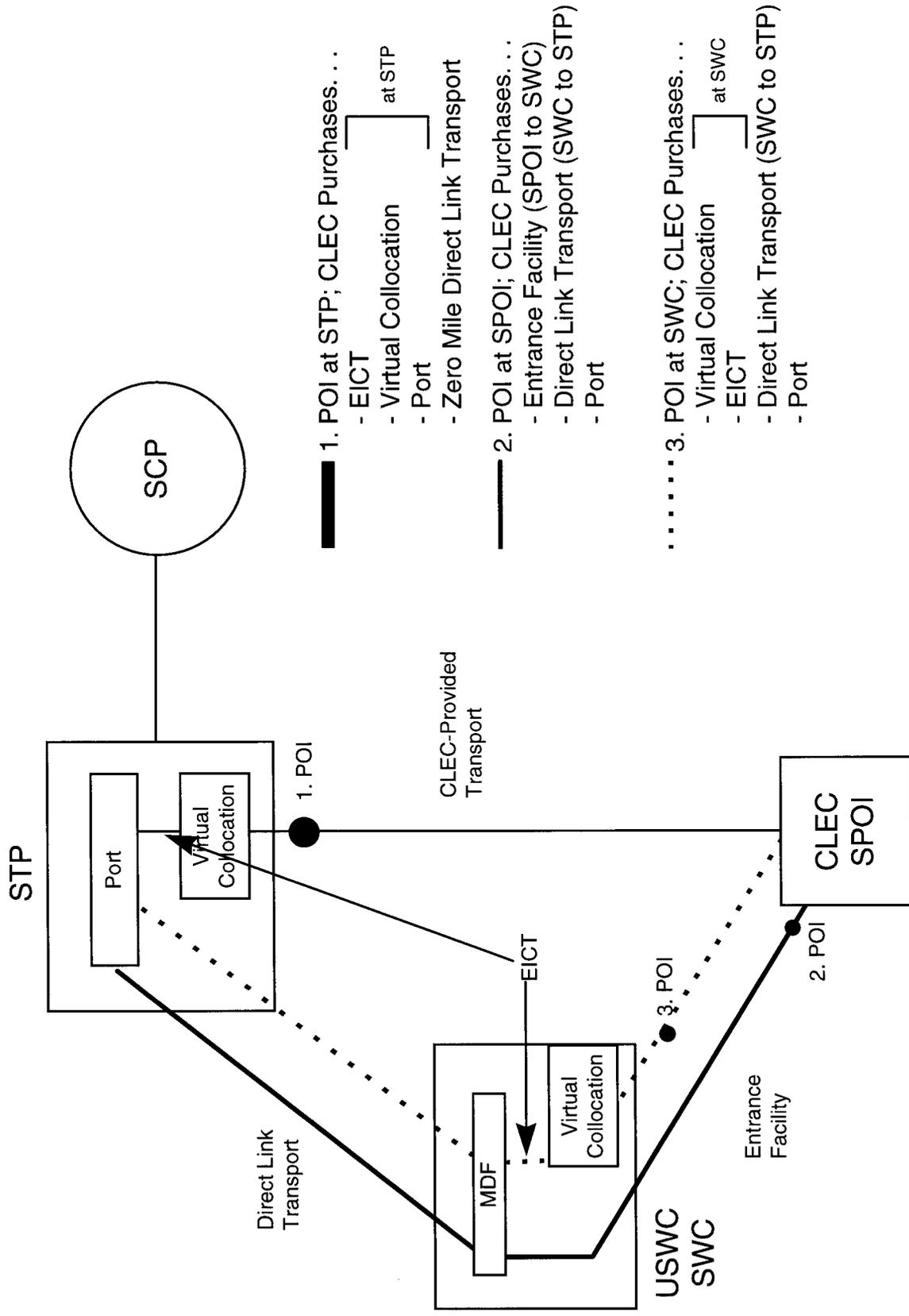
# Exhibit LAG -1

## E911 Interconnection



# Unbundled Signaling

Exhibit LAG - 2



**EXHIBIT LAG-3**

Arizona Price List  
Unbundled Signaling Rates

REV 1-16-98

Signaling (Note 4, 7 and 11)

Entrance Facility

DS1, Electrical, Recurring \$ 89.42  
DS3, Electrical, Recurring \$357.16

DS1, Electrical, Nonrecurring, First \$560.88

DS1, Electrical, Nonrecurring, Subsequent \$560.88

DS3, Electrical, Nonrecurring \$0.00

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Direct Link Transport

	<u>Fixed</u>	<u>Per Mile</u>
DS1 - 0 Miles	None	None
DS1- Over 0 to 8	\$35.98	\$ 0.65
DS1- Over 8 to 25	\$35.99	\$ 0.94
DS1- Over 25 to 50	\$3.00	\$ 1.75
DS1- Over 50	\$36.00	\$ 1.59
DS3 - 0 Miles	None	None
DS3 - Over 0 to 8	\$243.17	\$13.32
DS3 - Over 8 to 25	\$46.16	\$15.90
DS3 - Over 25 to 50	\$250.66	\$22.91
DS3 - Over 50	\$249.26	\$22.49

Multiplexing

DS1 to DSO, Recurring \$200.08  
DS3 to DS1, Recurring \$196.85

DS1 to DSO, Nonrecurring \$0.00

DS3 to DS1, Nonrecurring \$0.00

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CCS Link - First Link, Nonrecurring \$464.94

CCS Link - Each additional Link, Nonrecurring \$147.60

STP Port - Per Message, Recurring \$0.00005

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Section 20  
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FCC Part 5  
Section 20  
Page 16

CCS Links

CCS Links

Signaling Link

First Link, Recurring DSO \$ 24.85  
Additional Link, Recurring DSO \$ 24.85

SCP/Databases - Per Message \$0.00100

Notes:

4. Signaling Elements are taken from Hatfield with exceptions of DS1 and DS3 because Hatfield does not calculate these services.
7. The USWC and AT&T rate structures differ. To establish rates, each party's rate structure has been retained, and the proposed rate halved. In accordance with the Arbitrator's order.
11. If Ordered Concurrent with the CCS Link, only one NR Charge Applies.

**EXHIBIT LAG-4**

CLECs with access to 911/E911 Service in Arizona

CLECs with access to 911/E911 service through resale:

Facility-based CLECS interconnecting to U S WEST Selective Routers in  
Arizona:

**CONFIDENTIAL INFORMATION**

**AFFIDAVIT  
OF  
MALONE**

**BEFORE THE ARIZONA CORPORATION COMMISSION**

**JAMES M. IRVIN**  
Chairman  
**RENZ D. JENNINGS**  
Commissioner  
**CARL J. KUNASEK**  
Commissioner

<b>IN THE MATTER OF U S WEST</b>	)	<b>Docket No. U-0000-97-238</b>
<b>COMMUNICATIONS, INC'S</b>	)	
<b>COMPLIANCE WITH § 271 OF THE</b>	)	<b>U S WEST COMMUNICATIONS,</b>
<b>TELECOMMUNICATIONS ACT OF</b>	)	<b>INC'S FIRST PARTIAL</b>
<b>1996</b>	)	<b>COMPLIANCE FILING</b>

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**9. NUMBERING ADMINISTRATION**

**12. LOCAL DIALING PARITY**

**April 13, 1998**

STATE OF COLORADO     )  
  )  
  ) SS.  
COUNTY OF DENVER     )

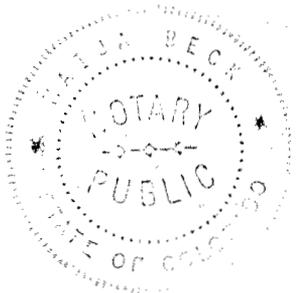
**AFFIDAVIT OF KATHRYN MALONE**

Kathryn Malone, being first duly sworn, states as follows:

1. My name is Kathryn Malone. I am Manager-Product and Market Management of U S WEST Communications, Inc. in Denver, Colorado.
2. Attached hereto and made a part hereof for all purposes is my affidavit consisting of pages numbered 1 through 9.
3. I hereby swear and affirm that the statements and data contained in the attached affidavit and exhibit are true and correct to the best of my knowledge and belief.

  
Kathryn Malone

SUBSCRIBED AND SWORN before me this 10<sup>th</sup> day of April, 1998.



  
Notary Public

My Commission expires  
May 3, 2002.

1 **Identification of Affiant**

2 My name is Kathryn Malone. I am employed by U S WEST  
3 Communications ("U S WEST") as Manager - Product and Market Management.  
4 My business address is 1801 California St., Room 2360, Denver, Colorado  
5 80202.

6 I began my career with U S WEST (Mountain Bell) in 1964 in the Denver  
7 Operator Services Department. In 1968, I joined the Network Facilities  
8 Department as a technical assistant. From 1968 to 1978, I held various  
9 positions responsible for coordination and design of Outside Plant Facilities. In  
10 1978, I was promoted to Budget Manager and was responsible for preparation  
11 and forecasting of both the construction and maintenance budgets in Arizona,  
12 Colorado, Montana and Wyoming.

13 In May 1984, after the divestiture of the Bell System, I accepted a position  
14 in the Revenue Requirements Department. In that capacity, I was responsible  
15 for cost settlements with the local exchange carriers. My responsibilities  
16 included analysis of cost separation studies. In January 1990, I was promoted to  
17 Senior Access Manager with accountability for developing and negotiating  
18 contractual arrangements for toll access compensation with local exchange  
19 carriers. Recently, I accepted the position of Manager - Product and Market  
20 Management with responsibility for issues surrounding interconnection and  
21 resale products and services.

22 **Purpose of Affidavit**

23 The purpose of my affidavit is to demonstrate to the Commission that  
24 U S WEST has satisfied the checklist requirements found in Section 271 of the  
25 Act and related FCC regulations for numbering and local dialing parity.  
26 Specifically, my affidavit provides facts and data describing how U S WEST  
27 complies with these checklist requirements. Because U S WEST provides

1 nondiscriminatory access to telephone numbers and dialing parity to competing  
2 providers of telephone service, I recommend the Commission find that  
3 U S WEST has satisfied the Act's checklist requirements for numbering and local  
4 dialing parity.

5 **Executive Summary**

6 U S WEST has satisfied the numbering administration and local dialing  
7 parity requirements of the Telecommunications Act of 1996 (Act) that are  
8 prerequisites for U S WEST's entry into the interLATA long distance market in  
9 Arizona. This affidavit reviews the checklist requirements found in Section 271  
10 of the Act for number administration and local dialing parity, and the related FCC  
11 regulations. These requirements are met through the various interconnection  
12 agreements between U S WEST and CLECs in Arizona.

13 U S WEST provides nondiscriminatory access to telephone numbers  
14 according to the Act and FCC regulations. U S WEST assigns central office  
15 codes to other carriers in the same manner as it assigns codes to itself, using the  
16 industry developed guidelines. U S WEST will continue to act as the Central  
17 Office Code Administrator in Arizona, under the oversight and complaint  
18 jurisdiction of the FCC and the Arizona Commission, until the number  
19 administration function transfers to the new third party administrator in the  
20 August 17 to September 4, 1998 time period.

21 The Act, and the resulting FCC rules, require U S WEST to provide  
22 access to such services or information necessary to allow local dialing parity.  
23 U S WEST customers and CLEC customers dial the same number of digits to  
24 make local calls. These local calls include calls to other customers regardless of  
25 their local service provider, as well as calls to operator services, directory  
26 assistance, and provisions for directory listings. There are no unreasonable

1 dialing delays because these calls are made in the same manner with the same  
2 number of digits by U S WEST customers and CLEC customers.

3 U S WEST has satisfied the number administration and local dialing parity  
4 requirements of the Telecommunications Act of 1996 (Act) and related FCC  
5 regulations. The Arizona Commission should therefore find that U S WEST has  
6 satisfied the Act's checklist requirements for number administration and local  
7 dialing parity.

1 **CHECKLIST ITEM 9 – NUMBERING ADMINISTRATION**

2 A Bell operating company satisfies competitive checklist item nine if “[u]ntil  
3 the date by which telecommunications numbering administration guidelines,  
4 plan, or rules are established, nondiscriminatory access to telephone numbers  
5 for assignment be provided to [a CLEC’s] telephone exchange service  
6 customers. After that date, compliance with such guidelines, plan or rules.”

7 U S WEST in its current role as administrator for Arizona, processes  
8 applications in accordance with the industry and ACC guidelines. The number  
9 administrator function, however, is scheduled to transition to the new North  
10 American Numbering Plan Administrator, Lockheed-Martin, in the August 17 to  
11 September 4, 1998 time period.

12 In its Second Interconnection Order, the FCC established two general  
13 requirements pursuant to the Act that govern the assignment of central office  
14 codes:

15 Any telecommunications carrier performing central office  
16 code administration:

17 (1) shall not charge fees for the assignment or use of  
18 central office codes to other telecommunications  
19 carriers, including paging and CMRS providers,  
20 unless the telecommunications carrier assigning the  
21 central office code charges one uniform fee for all  
22 carriers, including itself and its affiliates; and

23 (2) shall, consistent with this subpart, apply identical  
24 standards and procedures for processing all central  
25 office code assignment requests, and for assigning  
26 such codes, regardless of the identity of the  
27 telecommunications carrier making the request.

28 U S WEST complies with the above requirements of the Act and the FCC  
29 regulations through the terms and conditions of its agreements with CLECs in  
30 Arizona.

1 U S WEST applies identical industry standards whether a request for an  
2 NXX ("central office codes" or "prefixes") originates from U S WEST or a CLEC.  
3 The standards applied by U S WEST were developed by the National Industry  
4 Numbering Committee in response to a 1991 FCC request. The Central Office  
5 Code Assignment Guidelines require that NXXs be assigned to entities such as  
6 U S WEST, independent local exchange carriers, cellular carriers or CLECs if the  
7 applicant certifies the need for an NXX assignment. U S WEST's  
8 interconnection agreements provide that such assignments shall be made at no  
9 charge.

10 U S WEST has assigned seventeen NXX codes to new local exchange  
11 service providers in Arizona. Codes have been assigned to local exchange  
12 service in the rate centers for Cameron, Campe Verde, Casa Grande, Gila Bend,  
13 Nogales, Sierra Vista, Phoenix, Tucson and Yuma. During the same time period  
14 U S WEST assigned fifty-five NXX codes for its own use in Arizona. U S WEST  
15 has not refused any NXX assignment request from CLECs in Arizona. Section  
16 5.2.2 of the industry guidelines' provide for a response within 10 working days  
17 from the date of receipt of an application form. All of the CLEC NXX codes were  
18 assigned within 10 working days from the date the application form was  
19 received. In fact, the average CLEC request was completed in 3.41 days while  
20 the average U S WEST request was completed in 5.22 days.

## 21 **Summary**

22 The Act and the resulting FCC rules require that U S WEST assign  
23 numbering resources to CLECs in a non-discriminatory manner. U S WEST  
24 complies with these requirements by adhering to national industry guidelines  
25 which are incorporated into U S WEST's existing interconnection agreements,  
26 and through the internal procedures used to assign numbering resources to  
27 U S WEST and to CLECs. I recommend the Arizona Commission find that

1 | U S WEST has satisfied the Act's checklist requirements for number  
2 | administration.

1     **CHECKLIST ITEM 12 - LOCAL DIALING PARITY**

2             Section 271 (c)(2)(B)(xii) of the Act states the checklist requirement for  
3 local dialing parity as follows:

4             Nondiscriminatory access to such services or information as are  
5 necessary to allow the requesting carrier to implement local dialing  
6 parity in accordance with the requirements of Section 251(b)(3).

7             Section 251 (b)(3) of the Act specifies U S WEST's and other local  
8 exchange carriers' responsibilities with respect to dialing parity:

9             Each local exchange carrier has the following duties: # (3) dialing  
10 parity. The duty to provide dialing parity to competing providers of  
11 telephone exchange service and telephone toll service, and the  
12 duty to permit all such providers to have nondiscriminatory access  
13 to telephone numbers, operator services, directory assistance, and  
14 directory listing, with no unreasonable dialing delays.

15             In its Second Interconnection Order, the FCC established regulations  
16 pursuant to the Act that govern local dialing parity:

17             **Local Dialing Parity.** A LEC shall permit telephone exchange  
18 service customers within a local calling area to dial the same  
19 number of digits to make a local telephone call notwithstanding the  
20 identity of the customer's or the called party's telecommunications  
21 service provider.

22             To demonstrate compliance with the Act, U S WEST has included in its  
23 interconnection agreements specific provisions for local dialing parity. For  
24 example, The AT&T agreement at Section 43, Dialing Parity, states:

25             The Parties shall provide dialing parity to each other as required  
26 under Section 251 (b)(3) of the Act or state law or regulation as  
27 appropriate. U S WEST shall ensure that all AT&T Customers  
28 experience the same dialing parity as similarly-situated Customers  
29 of U S WEST services, such that, for example, for all call types: (a)  
30 an AT&T Customer is not required to dial any greater number of  
31 digits than a similarly-situated U S WEST Customer; and (b) the  
32 AT&T Customer may retain its local telephone number, so long as

1 the Customer continues receiving service in the same central office  
2 serving area.

3 CLECs have dialing parity for their local exchange customers with respect  
4 to the origination of local calls. CLECs are able to dial the same number of digits  
5 to originate local calls as U S WEST customers.

6 CLECs also have dialing parity for operator services. Customers of  
7 CLECs may use the same dialing pattern to access operator services as do  
8 U S WEST customers. Dialing "O" gets the customer to the operator that is  
9 designated by the CLEC. CLECs have a choice of operator service providers  
10 (including U S WEST, the CLEC itself, or some third party) in either a resale or  
11 interconnection environment, as described fully in Mary Pavlik's affidavit on  
12 checklist item 7c (operator services). Dialing "OO" routes the customer's call to  
13 its presubscribed long distance operator, whether the customer is U S WEST's  
14 or a CLEC's. The digits dialed to access operator services are the same for  
15 U S WEST and CLEC customers.

16 U S WEST customers access directory assistance by either dialing 1 411  
17 or 1 plus the area code plus 555-1212. If the CLEC chooses to use U S WEST's  
18 directory assistance through resale or through a facilities-based service, their  
19 customers may use the exact same dialing pattern. Even if the CLEC chooses a  
20 directory assistance provider other than U S WEST through either resale or  
21 through facilities-based service, the call will be routed to the correct provider with  
22 the same dialing pattern. Therefore, CLECs have dialing parity with respect to  
23 directory assistance. Additional details on nondiscriminatory access to directory  
24 assistance is described in the affidavit of Mary Pavlik for checklist item 7b  
25 (Directory Assistance).

26 Although Section 251 (b)(3) speaks to "telephone toll service," it has no  
27 impact on the checklist requirement of Section 271. The requirement in Section  
28 271 specifically references only "***local*** dialing parity" (emphasis added).

1 Nonetheless, U S WEST implemented intraLATA toll dialing parity in Arizona in  
2 April 1996 to 100 percent of its customers.

3 **Summary**

4 The Act, and the resulting FCC rules, require that U S WEST provide local  
5 dialing parity such that telephone exchange service customers dial the same  
6 number of digits to make a telephone call without regard to the local service  
7 provider of the calling or called party. The dialing patterns or use of the  
8 telephone exchange services are identical regardless of whether the customer  
9 uses U S WEST or a CLEC. U S WEST does not have any state court, federal  
10 court, FCC or legislative action pending to the provision of intraLATA and local  
11 dialing parity. Therefore, I recommend the Arizona Commission find that  
12 U S WEST has satisfied the Act's checklist requirements for local dialing parity.

13 Further your affiant sayeth not.

14