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24 March 1999

Charles W. Steese
US West Communications, Inc.
1801 California Street, Suite 5100
Denver, CO 80202

RE: US West Communications, Inc.'s Compliance with Section 271 of the
Telecommunications Act of 1996, Docket No. U-0000-97-238, T00000A-
97-0238

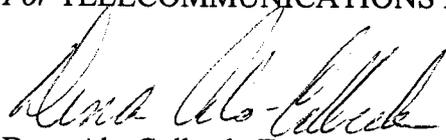
Dear Mr. Steese:

Pursuant to our discussion on Monday, 22 March 1999, enclosed is the *Supplemental Response of the Telecommunications Resellers Association to US West's First Set of Data Requests* in the above-captioned proceeding.

Questions may be directed to me.

Sincerely,

For TELECOMMUNICATIONS RESELLERS ASSOCIATION

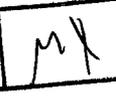

Dena Alo-Colbeck, Esq.

Enclosures

cc: Service List

Arizona Corporation Commission
DOCKETED

MAR 26 1999

DOCKETED BY	
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ORIGINAL

BEFORE THE
ARIZONA CORPORATION COMMISSION

IN RE: US WEST COMMUNICATIONS)	Docket No: U-0000-97-238
INC'S COMPLIANCE WITH SECTION)	T00000A-97-0238
271 OF THE TELECOMMUNICATION ACT)	
OF 1996)	
_____)	

SUPPLEMENTAL RESPONSES OF THE TELECOMMUNICATIONS RESELLERS ASSOCIATION TO US WEST'S FIRST SET OF DATA REQUESTS

The Telecommunications Resellers Association ("TRA") hereby submits supplemental responses to Request Nos. 1, 3 through 15, inclusive, and 40 of US West Communications Inc's ("US West") First Set of Data Requests To Telecommunications Resellers Association, as follows:

REQUEST NO. 1: Describe each complaint, problem, or concern you have relating to US West's provisioning of interconnection in accordance with the requirements of §251(c)(2) and §252(d)(1). Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of interconnection. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of interconnection.

RESPONSE: The sole document in TRA's possession that discusses US West in any way is TRA's 1998 Member Survey of Competition. The opening summary of the Survey is attached to this response. This survey contains numerous graphs and is presented in an electronic slide-show type format. Preparation of a hard copy is time consuming and could not be completed in time to be included in this response, but will be forwarded upon completion.

Should counsel wish to review the Member Survey prior to receipt of the hard copy, it is available at TRA's website, at www.tra.org.

REQUEST NO. 3: Describe each complaint, problem, or concern you have relating to US West's provisioning of non-discriminatory access to poles, ducts, conduits, and rights of way that US West owns or controls. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of poles, ducts, conduits, and rights of way. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of poles, ducts, conduits, and rights of way.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 4: Describe each complaint, problem, or concern you have relating to US West's provisioning of local loop transmission from the central office to the customer's premises, unbundled from local switching or other services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of unbundled local loop transmission. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of local loop transmission from the central office to the customer's premises, unbundled from local switching or other services.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 5: Describe each complaint, problem, or concern you have relating to US West's provisioning of local transport from the trunk side of the wireline local exchange carrier switch, unbundled from switching or other services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents

relating in any way to US West's provisioning of unbundled local transport. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of local transport from the trunk side of the wireline local exchange carrier switch, unbundled from switching or other services.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 6: Describe each complaint, problem, or concern you have relating to US West's provisioning of local switching unbundled from local transport, local loop transmission, or other services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of unbundled local switching. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of local switching unbundled from transport, local loop transmission, or other services.

RESPONSE: See response to Data Request No. 1.

REQUEST NO 7: Describe each complaint, problem, or concern you have relating to US West's provisioning of nondiscriminatory access to 911 or E911 services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of these services. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of 911 and E911 services.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 8: Describe each complaint, problem, or concern you have relating to US West's provisioning of directory assistance services. Produce all documents

reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of these services. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of directory assistance services.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 9: Describe each complaint, problem, or concern you have relating to US West's provisioning of operator call completion services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of these services. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of operator call completion services.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 10: Describe each complaint, problem, or concern you have relating to US West's provisioning of white pages directory listings for customers of other carriers' telephone exchange services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of white pages directory listings. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of white pages directory listings for customers of other carriers' telephone exchange services.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 11: Describe each complaint, problem, or concern you have relating to US West's provisioning of nondiscriminatory access to databases and associated

signaling necessary for call routing and call completion. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of databases and associated signaling. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of nondiscriminatory access to databases and associated signaling necessary for call completion.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 12: Describe each complaint, problem, or concern you have relating to US West's provisioning of interim and/or long-term number portability. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of interim and/or long-term number portability. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of interim and/or long-term number portability.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 13: Describe each complaint, problem, or concern you have relating to the availability from US West of reciprocal compensation arrangements in accordance with the requirements of §252(d)(1). Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to the reciprocal compensation arrangements that US West's provides. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about the reciprocal arrangements that US West provides or makes available.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 14: Describe each complaint, problem, or concern you have relating to US West's provisioning of telecommunications services available for resale in accordance with the requirements of §251(c)(4) and §252(d)(3). Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of telecommunications services available for resale. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of telecommunications services available for resale.

RESPONSE: See response to Data Request No. 1.

REQUEST NO. 15: Please identify all entities other than US West, including TRA itself, from which TRA has obtained, or can obtain, for use in Arizona or in any of the other 13 states in US West's region any of the following elements, items, or services: (1) local loops; (2) network interface devices; (3) local switching; (4) interoffice transmission facilities; (5) vertical features; (6) directory assistance; and (7) operator services. Produce all documents that relate to your ability to obtain such elements, items, or services for use in Arizona or in any of the other 13 states in US West's region.

RESPONSE: TRA is an industry trade association, not a provider of telecommunications services. TRA has not obtained any of the elements described in the foregoing data request for use in Arizona or in any other state. Furthermore, as TRA is not certificated as a provider of telecommunications services in any state, TRA does not have the ability to obtain any of the elements described in the foregoing data request. TRA does not anticipate seeking certification to provide telecommunications services at any time in the future.

However, counsel understands that US West has further interpreted the foregoing data request as seeking documentation in TRA's possession identifying companies where resellers or other providers of telecommunications services may obtain any of the foregoing described elements from any provider other than US West in any of the thirteen states comprising US West's service region. TRA objects to this interpretation of the foregoing data request. The interpretation renders Data Request No. 15 vague and misleading, and so completely modifies the data request as to constitute creation of an entirely new data request. Notwithstanding this objection, TRA answers as follows:

TRA has no information or documentation in its possession which is responsive to this data request.

REQUEST NO. 40: Produce any documents that discuss, refer, or relate to any analyses by TRA concerning how competition will change in Arizona's local and long distance markets if US West is authorized to compete in the interLATA market in that state.

RESPONSE: TRA has no information or documentation in its possession which is responsive to this data request.

Telecommunications Resellers Association

BY:  _____

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24 March 1999

BEFORE THE
ARIZONA CORPORATION COMMISSION

IN RE: US WEST COMMUNICATIONS)
INC'S COMPLIANCE WITH SECTION)
271 OF THE TELECOMUNICATION ACT)
OF 1996)
_____)

Docket No: U-0000-97-238
T00000A-97-0238

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the Supplemental Responses of the Telecommunications Resellers Association to US West's First Set of Data Requests on all parties of record in this proceeding, via Overnight Delivery or United States Mail, as noted on the following service list.

Dated this 24th Day of March, 1999 at Gig Harbor, Washington



Dena Alo-Colbeck

Original sent via Overnight Mail, Properly Addressed, Postage Prepaid to:

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Copies filed via Overnight Mail, Properly Addressed, Postage Prepaid at:

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Dear Survey Reader:

The Telecommunications Resellers Association recently conducted its first ever survey of company members active in the resale of local exchange services.

While the intent of the survey was purely to determine the scope of TRA member involvement in the evolving competitive local exchange market, a few items of particular interest surfaced.

Many companies attempting a total service resale strategy in offering competitive services to consumers find their efforts to do so profitably are hampered due to three major impediments: 1) inadequate discount rates, 2) poor service levels provided by the incumbent and 3) inadequate access to operation support systems. These impediments hinder resale as a means for sustaining a long term business plan and as a strategy for providing customers with choice in their local service, especially residential customers.

As expected, the survey showed that the effects of competition are realized more in the business community than in the residential consumer market. However, it should be noted that 94% of residential subscribers receiving competitive local exchange service do so through a reseller, not a facility-based CLEC.

Local Survey

While substantial growth rate projections are reported by both resellers and facility based competitors, facility based competitors indicated a far greater rate of increase. Given the apparent lack of interest being paid to the residential market, such a disparate rate of growth between these two competitive alternatives will ultimately bring greater choice to the business community sooner, while the residential marketplace will fall further behind. Given these survey findings, TRA has requested that the FCC exert its influence wherever possible in promoting resale as a critical element in bringing choice in telecommunications service providers to all consumers. We also sought encouragement of state regulators to revisit current wholesale discount levels and adopt a comprehensive list of service level measurements specific to the needs of resellers.

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