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BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
Chairman
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Commissioner

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IN THE MATTER OF U S WEST)
COMMUNICATIONS, INC'S) Docket No. T-0000B-97-0238
COMPLIANCE WITH §271 OF THE) SPRINT'S SUPPLEMENTAL
TELECOMMUNICATIONS ACT OF) RESPONSES TO U S
1996) WEST'S FIRST SET OF DATA
) REQUESTS

Sprint Communications Company L.P. (Sprint) hereby supplements its response to "U S WEST's First Set of Data Requests to Sprint Communications Company L.P." Pursuant to the Hearing Examiners' ruling of May 21, 1999, Sprint supplements its original response to the portions of Request Number 22 as indicated below. Its prior responses to Request Numbers 23 & 34 remain unchanged.

REQUEST NO. 22.

Identify each electronic ~~interface~~ functionality Sprint requires to provide local service in Arizona ~~and the other 13 states in U S WEST's region~~ for the purpose of obtaining access to U S WEST's pre-ordering, ordering, provisioning, billing, and maintenance and repair systems. For each ~~interface~~ functionality that Sprint identifies, please provide the following: (1) identify each ~~interface~~ that Sprint believes is not available from U S WEST; (2) if the ~~interface~~ is available and Sprint contends it is inadequate, describe in detail each concern that Sprint has about the adequacy of U S WEST's ~~interface~~; (3) the date Sprint requires the ~~interface~~ to be made available from U S WEST for testing by Sprint; and (4) when Sprint intends to begin using the ~~interface~~ to provide local exchange service in Arizona and the other 13 states in U S WEST's region. ~~Produce all documents that relate to any of the responses that Sprint provides to this data request.~~

Response:

Sprint is currently working with U S WEST to ensure a thorough understanding of business rules, documented by U S WEST. To the extent that U S WEST's proposed interfaces are consistent with established industry standards and guidelines, the development efforts already underway with other ILEC's should be a valid baseline for development of electronic "computer-to-computer" interfaces with U S WEST. Software modifications and development efforts should then be limited to the unique business rules and processing requirements of U S WEST. To the extent that U S WEST has already satisfactorily developed, tested, and deployed these interfaces with other CLEC's, testing with Sprint should be accomplished in a timely and efficient manner. Sprint expects to begin testing and implementation of EDI interfaces with U S West prior to year-end 1999. The exact timing for U S West and the amount of functionality that can be automated in this region can not be determined until our analysis has been completed. Sprint is currently testing limited functionality with several other RBOCs and would expect to utilize much of the same software and testing criteria with U S West later this year.

SUPPLEMENTAL RESPONSE:

- To date, Sprint has documented electronic "computer to computer" business requirements for Loop services. Sprint has not begun testing any of U S WEST electronic interfaces. Sprint and U S WEST interface testing of Loop Services is targeted for year-end 1999.
- Sprint has not begun collecting U S WEST business requirements for local resale services. Sprint anticipates that documenting of electronic "computer to computer" interface of business requirements for resale should occur in the 4th quarter of 1999. In addition, Sprint expects that all pre-order, order, provisioning, billing, and maintenance and repair systems will be available through electronic "computer to

computer" interface. To this date all we have is U S WEST's assurances that they can provide these. We will not have any hard evidence either way until we conduct our investigation.

- Sprint did identify an issue when analyzing U S WEST Directory electronic interfaces. USW supports a separate Directory EDI interfaces for resale and facility-based. Therefore, separate directory business requirements will need to be written to accommodate resale and facility-based. Separate directory feeds are not in compliance with industry standard guidelines and will not be compatible with Sprint's OSS system. Sprint contends that the Directory process by U S WEST is inadequate.
- Because there is **no** mechanized system for Complex services, Sprint has begun to do minimal testing of non-mechanized processes to provision complex services. Provisioning of orders is an issue since processing them requires the (non-automated) coordination of numerous centers throughout the U S WEST territory. For example: an order for DSL service is received by the center in Denver. The order is then fed internally to centers in South Dakota and Iowa for provisioning. On one occasion, Sprint issued an order in the Alpha environment and was given 7 reference numbers for internal orders to U S WEST. Concerns center around the time frame for the provisioning of orders by U S WEST.
- IMA (US WEST GUI) basically receives and then drops orders to be manually handled via several internal U S WEST systems. U S WEST, in most cases, will need to initiate multiple orders internally to provision one order sent from Sprint. Sprint must manually review and validate each returned order with U S WEST. As a result, Sprint must perform additional analysis, incur more cost, and time delays for each returned order from U S WEST. Sprint contends that the provisioning of orders by U S WEST is inadequate.
- There is no change management practice established by U S WEST. Thus, software changes cannot be adequately processed through the U S WEST System to its CLEC customers. Sprint is constantly at risk in production environment of software changes that could adversely impact our end user customer. The issue is that Sprint cannot operate in parity with U S WEST where no change management is in place to notify Sprint of outages or software updates. Sprint contends that not having a change management practice by U S WEST is inadequate.
- U S WEST does not currently support multiple versions of releases. In addition, USWC plans to employ flash cuts of version changes leaving the CLEC at risk. To flash cut means that the CLEC has no notice when the ILEC alters a system. Flash cuts offer no tolerance for old business requirements written into CLEC interfaces once the change is made. Flash cuts from one release to the next are not backward compatible. Therefore, Sprint must continually upgrade its software or business requirements to potentially accommodate unilateral flash cuts by U S WEST. Sprint

contends that the unilateral lack of maintaining multiple versions of code and flash cuts by U S WEST is inadequate.

- Sprint is in the process of developing business requirements for electronic “computer to computer” system functionality for maintenance and repair. Sprint has identified several unique data elements in the U S WEST maintenance and repair system that are not supported in industry standard guidelines. As a result, Sprint must adapt and incur additional costs to accommodate these non-industry standard guideline data elements. Sprint contends that U S WEST Maintenance and repair system is not fully supporting industry standard guidelines.
- The following matrix provides further responses to this request.

SYSTEM REQUIRED	STATUS	Pre-Ordering	Ordering	Provisioning	Billing	Maint & Repair
EDI for Business Resale	Sprint development not started. Will begin development 4 th Q 1999.	Needed. Sprint has no experience with the functionalities provided by USWC.	Needed. Sprint has no experience with the functionalities provided by USWC.	Needed. Sprint has no experience with the functionalities provided by USWC.	Needed. Sprint has no experience with the functionalities provided by USWC.	See below for all services
EDI for Business UNE Loop	Under Development. Business Requirements have been documented. Testing to begin Y/E 1999.	Needed	Needed	Needed	Needed	See below for all services
EDI for Complex Circuits	Development not started. Will begin development 4 th Q 1999.	Needed. Sprint has no experience with the functionalities provided by USWC.	Needed. Sprint has no experience with the functionalities provided by USWC..	Needed. Sprint has no experience with the functionalities provided by USWC.	Needed. Sprint has no experience with the functionalities provided by USWC..	See below for all services
EDI for Residential Resale	Development not started. Will begin development 4 th Q 1999	Needed. Sprint has no experience with the functionalities provided by USWC.	Needed. Sprint has no experience with the functionalities provided by USWC.	Needed. Sprint has no experience with the functionalities provided by USWC.	Needed. Sprint has no experience with the functionalities provided by USWC.	See below for all services
EDI for Residential UNE Loop	Same as Business UNE Loop above	Same as Business UNE Loop above	Same as Business UNE Loop above	Same as Business UNE Loop above	Same as Business UNE Loop above	See below for all services
Trouble Reporting (All services)	To be tested Y/E 1999 will depend upon success of	NA	NA	NA	NA	EDI application is available

	UNE Loop testing above.					for LD business. In process of adapting for CLEC business.
GUI for Business Resale	IMA is presently available.	Needed. Most functions available.	Needed. No flow through of orders. Will require manual intervention.	Needed. Manual tracking reported on GUI.	Needed	See Above
GUI for Residential Resale	IMA is presently available.	Needed. Most functions available. No rural addresses.	Needed. No flow through of orders. Will require manual intervention.	Needed. Manual tracking reported on GUI.	Needed	See Above
GUI for UNEs	Not Available from U S WEST	Needed.	Needed.	Needed.	Needed.	See Above
GUI for CENTREX	Not Available	Needed	Needed	Needed	Needed	See Above
GUI for (Complex Circuits)	USWC does not have any system to handle Complex Orders. Manual processes are convoluted and require transfers of orders to multiple centers.	Needed	Needed	Needed	Needed	See Above
EDI for Directory	Development not started. Unfortunately USWC requires separate EDI feed for Resale and Facility – based. This is not industry standard	NA	NA	NA	NA	NA

REQUEST NO. 23.

If Sprint contends that other ILECs are meeting any of Sprint's electronic interface needs relating to local exchange service, unbundled network element, or any other aspect of local service, identify the ILEC(s), describe the system(s) or interface(s) functionalities the ILEC(s) is using, and provide the name of a contact person at the ILEC(s) who is familiar with the system functionality. ~~Produce all documents that discuss, describe, or otherwise explain and/or discuss the capabilities of any such system(s) or interface(s).~~

Response:

Sprint does not contend that any other ILECs are meeting Sprint's electronic interface needs.

REQUEST NO. 34.

Does Sprint intend to commit, in association with U S WEST, to the development and/or availability of a production-ready OSS EDI for pre-ordering, ordering, and maintenance and repair for residential POTS and small business? If so, when? If not, why not? ~~Produce all documents that discuss, refer, or relate to any consideration by Sprint of whether to, and/or when to develop an OSS EDI interface in association with U S WEST, including, but not limited to, documents relating to Sprint's decision in the past to terminate or suspend this type of development with U S WEST.~~

Response:

See response to Request 22.

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