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AZ CORP COMMISSION

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BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
CHAIRMAN

JIM IRVIN
COMMISSIONER

BILL MUNDELL
COMMISSIONER

Arizona Corporation Commission
DOCKETED

JUN 22 1999

DOCKETED BY *[Signature]*

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S COMPLIANCE
WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

RESPONSE OF ACI CORP. TO
JUNE 8, 1999 PROCEDURAL
ORDER

On June 8, 1999, the Chief Hearing Officer, Jerry L. Rudibaugh, of the Arizona Corporation Commission ("Commission") issued a procedural order continuing its presently scheduled hearing and procedural dates in this proceeding to obtain parties' input regarding the best procedure to achieve an efficient and thorough review of Operational Support Systems ("OSS") issues in this application filed by U S WEST Communications, Inc. ("U S WEST"). The order states that the Commission believes that the standards for OSS must be clarified to determine whether U S WEST has met these standards. The order also states that a collaborative process to assist U S WEST in complying with the standards will result in a more expeditious satisfaction of § 271 requirements.

1 ACI Corp. (“ACI”) incorporates by reference the responses of MCI WorldCom, Inc. to the
2 questions posed by the Commission, but also provides its separate responses to the following
3 questions.

4 **4. What are other standards this Commission should consider in**
5 **evaluating whether U S WEST OSS complies with § 271?**

6 The Commission should look to certain measures and performance standards to
7 ascertain if CLECs are receiving non-discriminatory access to U S WEST’s OSS and back
8 office systems. Specifically, at any time during ACI’s preordering, ordering, provisioning,
9 maintenance and repair, and billing processes, U S WEST should provide to ACI full real-
10 time electronic, mediated access to U S WEST’s loop or outside plant electronic databases
11 (e.g., Loop Facilities Assignment and Control System (“LFACS”)) that provide
12 information that is unfiltered and unmasked. This information should include, without
13 limitation, all loop characteristic information (e.g., 26 gauge equivalent loop length; the
14 existence of intervening equipment such as load coils, repeaters or DAMLs; the amount
15 and location of bridged taps; the existence of digital loop carrier systems and total plan
16 availability [capacity/demand]) for ACI’s use in its (i) preordering and loop qualification
17 (ii) ordering (iii) provisioning (iv) maintenance and repair and (v) billing processes. The
18 data that U S WEST provisions to ACI should be sufficient for ACI to ensure that prior to
19 acceptance of an ordered loop, said loop has metallic (copper) continuity and balance.
20
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23 U S WEST must also provide mediated access to databases for all repair processes.
24 ACI must be able to follow the progression of a “trouble ticket” at all stages of the
25 maintenance and repair project.
26

1 **7. What information is necessary to enable you to determine whether U S**
2 **West's OSS is acceptable?**

3 The collaborative process must elicit the clear conclusion that U S WEST's
4 total and ongoing implementation of OSS is effective to enable the Commission to
5 determine that U S WEST's OSS is acceptable. U S WEST must not be permitted
6 to implement a "one-off" demonstration of OSS capability that pacifies concerned
7 parties into believing that database access and reliability problems have been
8 solved. U S WEST must have a proven and lengthy track record of OSS
9 consistency before the Commission deems its OSS is acceptable for Section 271
10 purposes. This will require test results that demonstrate the readiness of the OSS to
11 process commercial, not experimental, levels of CLEC orders. It will also require
12 an ongoing enforcement mechanism that will ensure that U S WEST continues to
13 meet the adopted performance measurements after it receives Section 271
14 certification.
15
16

17 **10. How should the workshops be conducted to ensure maximum results**
18 **in assessing U S WEST's OSS? Who should participate? How many**
19 **workshops do you anticipate being useful, and over what period of**
20 **time?**

21 ACI's resources are limited as compared with the larger competitors involved in this
22 proceeding and, although it will participate to the best of its ability, this means that workshops
23 must be specifically geared to particular OSS subject matters, rather than generic OSS sessions.
24
25
26

1 In this way smaller parties such as ACI may best allocate their resources and participate most
2 effectively.

3 Dated: June 22, 1999

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21 foregoing filed this 22nd day of June, 1999,
22 with:

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COPY of the foregoing hand-
delivered this 22nd day of June, 1999,
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