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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission
DOCKETED

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

Docket No. T-00000197238 **JUN 22 1999**

DOCKETED BY *rac*

COX ARIZONA TELCOM, INC.'S
RESPONSE TO JUNE 8, 1999 PROCEDURAL ORDER
QUESTIONS RE SERVICE QUALITY

Pursuant to the June 8, 1999 Procedural Order, Cox Arizona Telcom, Inc. ("Cox") responds to the following 14 questions:

1. What are the current national standards for OSS?

Response to No. 1: The OSS standards are currently being set on a state-by-state basis, although various industry groups continue to address the issues. The Telecommunications Act of 1996 and FCC regulations and orders provide only broad guidelines for state commissions addressing the issue.

2. For areas in which no national standards exist, when are national standards anticipated?

Response to No. 2: There is no date set for the FCC to develop and adopt national OSS standards. The progress of work being done at the state level varies significantly from state to state – from no work at all to standards that are nearly

1 complete.

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3. What are the current FCC guidelines for OSS?

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Response to No. 3: FCC guidelines on OSS, to the extent there are any, are set forth in the FCC's First Report and Order (§§ 504-528) and in the FCC's five § 271 orders. The guidance provided in those orders does not cover all aspects of OSS. Moreover, the FCC has a set of historical quality – measurement guidelines, but those guidelines are significantly outdated and virtually of no use in today's environment, particularly with respect to CLEC access to an ILEC OSS and how the OSS must perform.

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

Response to No. 4: Whatever standards are considered, those standards should apply equally to (and should be equally appropriate for) provisioning UNEs and resold services. The standards should not over emphasize resale to the detriment of standards appropriate for facility- or partial facility-based carriers.

5. Has an OSS, or any portion of OSS, been approved by the FCC? If so, please provide specifics.

Response to No. 5: To the best of Cox's knowledge, the FCC has not approved any ILEC OSS.

6. What type of collaborative process do you recommend to enable the parties to reach agreement on an acceptable OSS?

Response to No. 6: Cox does not take a position on a specific process other than

1 to urge the Commission to adopt a process that allows the concerns and issues raised by
2 these questions to be fully addressed.

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4 7. What information is necessary to enable you to determine whether
5 US WEST's OSS is acceptable?

6 **Response to No. 7:** At a minimum, Cox would need complete information on
7 each function – provisioning functions (specific UNEs, combinations, etc.), informa-
8 tional functions (such as customer information, order status or repair status), etc. – US
9 West contends is available through its OSS. If the OSS provided all necessary
10 functions, Cox would need information from sufficient testing of the OSS to ensure it
11 actually operates as represented. Cox also would require a copy of any US West
12 OSS/Network Service Quality Performance Standards document.

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14 8. Do you agree that formal discovery should remain in place during
15 the workshop phase of OSS? Should the discovery process be
16 modified, if so, how?

17 **Response to No. 8:** Cox believes that completion of the current CLEC discovery
18 directed to US West on OSS issues would allow greater progress to be made in a
19 shorter period of time. Moreover, depending on the workshop format, it may be
20 appropriate to allow some additional CLEC discovery of US West on OSS issues.

21 Cox believes all other discovery should be stayed until the OSS phase is
22 concluded. The telecommunications environment in Arizona is changing rapidly –
23 almost on a monthly basis. Today's discovery responses – particularly regarding the
24 level of competition in the market and US West's actual performance with respect to
25 the fourteen point checklist – may be obsolete six months from now when issues other
26 than OSS issues are addressed by the Commission. The burden of discovery,
particularly on CLECs with limited staff, is not justified given the need to focus initially

1 on OSS issues.

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- 3 9. What discovery items that had been incorporated into intervenors'
4 testimony should be separated out and responded to by intervenors
5 prior to the filing of testimony?

6 **Response to No. 9: We understand this question is directed primarily to US**
7 **WEST. However, Cox believes there should be no discovery of intervenors until**
8 **intervenors file their testimony setting forth their positions on specific issues in this**
9 **docket.**

- 10 10. How should the workshops be conducted to ensure maximum
11 results in assessing US WEST's OSS? Who should participate?
12 How many workshops do you anticipate being useful, and over
13 what period of time?

14 **Response to No. 10: Cox is not wedded to any particular workshop format or**
15 **duration, although the workshop process ultimately should include rigorous testing of**
16 **the OSS once US West believes its OSS meets the standards determined in the**
17 **workshops. Cox believes participation should include facilities-based CLECs, reseller**
18 **CLECs, Commission Staff and perhaps RUCO (to assure that the OSS provides**
19 **adequate wholesale service quality performance so that consumers can receive**
20 **acceptable performance from CLECs).**

- 21 11. Should a Staff Report issue with recommendations regarding
22 existing OSS compliance and modifications to achieve compliance?
23 How long after the last workshop will Staff need to issue a Report?

24 **Response to No. 11: Cox believes Staff should issue a Report on US WEST's**
25 **OSS compliance and modifications to achieve compliance. Cox defers to Commission**
26 **Staff regarding the timing for issuance of the Staff Report.**

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12. How much time after issuance of a Staff Report will you need to respond to the Report?

Response to No. 12: Cox requests 30 days to respond after the issuance of the Staff Report.

13. When will the intervenors and Staff be able to file a preliminary statement indicating whether US WEST is in compliance with any checklist items?

Response to No. 13: With respect to the fourteen checklist items in § 271, Cox has insufficient information to conclude whether US WEST is in compliance with any particular checklist item at this time. Cox would be willing to identify those checklist items on which it will not take a position this docket within 30 days from a request to do so.

14. Any other relevant information that the parties desire to provide.

Response to No. 14: Cox could provide a draft set of Service Quality Performance Measures (SQPMs) for consideration. These draft SQPMs reflect the current requirements of facility-based providers from Cox's perspective and would be pertinent to the standards for US WEST's OSS.

Dated: June 22, 1999.

Respectfully submitted,
COX ARIZONA TELCOM, INC.

By 

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