BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
Chairman
JAMES M. IRVIN
Commissioner
WILLIAM MUNDELL
Commissioner

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

DOCKET NO. T-00000B-97-0238

U S WEST'S INITIAL POSITION STATEMENT REGARDING OSS WORKSHOPS

U S WEST, by its counsel, respectfully submits its position statement regarding the workshops to be held regarding operational support systems ("OSS"). The following sets forth U S WEST's position regarding the access it provides CLECs to its OSS. A more complete explanation is contained within the testimony of Dean Buhler previously filed in this matter.

Requirements for Nondiscriminatory Access to OSS

Although the Telecommunications Act of 1996 does not expressly list access to OSS in the Section 271 competitive checklist or elsewhere, in paragraph 516 of its FCC Interconnection Order, the FCC concluded that "operations support systems and the information they contain fall squarely within the definition of 'network element' and must be unbundled upon request." FCC Interconnection Order ¶ 516. Upon review, the Eighth Circuit affirmed the FCC's determination, but held that while OSS are network elements to which ILECs must provide nondiscriminatory access, "subsection 251(c)(3) does not mandate that requesting carriers receive superior quality access to network elements upon demand." Iowa Utils. Bd., 120 F.3d at 812.

In evaluating whether a BOC is providing nondiscriminatory access to its OSS, the FCC has established a two-part inquiry. First, "the [FCC] must determine whether the

BOC has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions [pre-ordering, ordering, provisioning, repair an maintenance, and billing] and whether the BOC is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them." Ameritech Michigan Order ¶ 136; see also BellSouth Louisiana II Order ¶ 85. The FCC described this to mean that the BOC must demonstrate that: (1) it has developed sufficient electronic and manual interfaces to allow competing carriers to access all necessary OSS functions; (2) for those functions that the BOC accesses electronically, it has provided equivalent access for competing carriers; (3) it has provided technical specifications to enable competing carriers to design or modify their computer systems; and (4) its OSS are able to handle current and reasonably foreseeable demand. See Ameritech Michigan Order ¶ 137. Second, the FCC must assess "whether the OSS functions that the BOC has deployed are operationally ready, as a practical matter." Ameritech Michigan Order ¶ 136; see also BellSouth Louisiana II Order ¶ 85.

For those OSS functions that are analogous to OSS functions the BOC performs for itself (such as pre-ordering, ordering and provisioning for resale), the BOC must offer access that is "equivalent" to the access it provides itself. See BellSouth Louisiana II Order ¶ 87; BellSouth South Carolina Order ¶ 98. Equivalency is not defined as identical, however, but rather as access to OSS functions such that CLECs are able to perform OSS functions in substantially the same time and manner as the BOC. Id. In fact, "equivalent access" must be construed broadly to include comparisons of analogous functions between CLECs and the BOC, "even if the actual mechanism used to perform the function is different for competing carriers than for the BOC's retail operations." Ameritech Michigan Order ¶ 139. Moreover, the FCC recognized "that there may be situations in which a BOC contends that, although equivalent access has not been achieved for an analogous function, the access that it provides is still nondiscriminatory within the meaning of the statute." Ameritech Michigan Order ¶ 141 n. 345.

The FCC has specifically recognized that the ordering and provisioning of unbundled network elements does not have a retail analogue. For those functions with no retail analogue (such as ordering and provisioning of UNEs), the BOC must establish that its interfaces provide efficient CLECs with a "meaningful opportunity to compete." BellSouth Louisiana II Order ¶ 87; Ameritech Michigan Order ¶ 141.

In assessing a BOC's OSS offerings, the FCC considers "all of the automated and manual processes the BOC has undertaken to provide access to OSS functions" to CLECs, including: (1) the "point of interface (or 'gateway')" between the BOC's and the CLEC's internal OSS; (2) any "electronic or manual processing link" between the gateway and the BOC's internal OSS; and (3) all of the BOC's internal OSS -- "legacy systems" -- used in providing network elements and resale services to a CLEC. Ameritech Michigan Order ¶ 135.

U S WEST's OSS Interfaces

In identifying OSS as an unbundled network element, the FCC has established that an ILEC must provide CLECs access to the ILEC's internal OSS legacy systems for four areas of functionality: (1) preordering/ordering; (2) provisioning; (3) maintenance and repair; and (4) billing. As set forth in the testimony of Dean Buhler, U S WEST provides non-discriminatory access to all of these functions.

To meet its requirement of providing nondiscriminatory access to OSS, U S WEST has deployed several electronic interfaces, including computer-to-computer and human-to-computer interfaces. These interfaces allow CLECs to perform the preordering/ordering, provisioning, maintenance and repair, and billing functions to which the FCC requires ILECs to provide access. U S WEST has spent in excess of $150 million dollars developing these interfaces and adjusting its systems to meet the demands of CLECs.

The most used of U S WEST's interfaces is its real-time human-to-computer interface, which is an electronic interface called Interconnection Mediated Access, or

IMA. IMA permits CLECs to perform the pre-ordering, ordering, provisioning, repair and maintenance OSS functions to which the FCC requires ILECs to provide access.

To complement its human-to-computer electronic interface, U S WEST has also deployed two real-time computer-to-computer electronic interfaces: EDI (electronic data interchange) and EB-TA (electronic bonding - trouble administration) that, together, support preordering, ordering and provisioning, and repair transactions. Consistent with the FCC's BellSouth South Carolina Order, the IMA graphical user interface ("GUI") and EDI electronic interfaces have integrated preordering and ordering, which means a user need not back out of preordering to go into ordering.[1]

U S WEST's electronic interfaces comply with industry standards. EDI utilizes the LSOG guidelines developed at the Ordering and Billing Forum ("OBF"), the national standards body created to develop such consistent business processes, the EDI message format standard, and the TCP-Direct/SSL-3 transport for preordering and ordering. The IMA GUI is based on the Local Service Ordering Guidelines ("LSOG") and uses a WEB standard technology, Hyper Text Markup Language ("HTML"), JAVA and the Transmission Control Protocol/Internet Protocol ("TCP/IP") protocol to transmit messages. For repair, EB-TA utilizes the ECIC EB-TA standards as well as OSI CMIP/CMISE protocols.

Where applicable, U S WEST's IMA, EDI and EB-TA interfaces provide real-time access. Where real-time processing is not possible, practical or necessary (e.g. completion reporting), the interfaces provide batch processing on a nondiscriminatory basis. With batch interfaces, the data is gathered over a period of time and then exchanged all at once.

U S WEST uses "batch" electronic interfaces to provide billing information to the CLECs. U S WEST transmits the daily usage feed, a file containing all the call record

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[1] See BellSouth South Carolina Order at ¶¶ 158-61.

detail formatted in EMI (exchange message interface), to CLECs on a nightly basis. The monthly summary bill is accumulated and sent once a month. Batch processing is entirely appropriate for functions such as billing, where a large amount of information is required to be transferred between two systems on a scheduled basis.

U S WEST has also modified its EXACT interface to support those local interconnection products that are ordered on an access service request (ASR). Included are LIS Trunks, unbundled dedicated interoffice transport (UDIT) and trunkside switch ports. Thus, U S WEST's interfaces provide CLECs with access to the same OSS systems to which U S WEST service representatives have access.

Because it is a computer-to-computer interface, EDI transfers information from U S WEST's OSS to the CLEC's OSS, thereby eliminating the need for double entry. EDI also permits real-time pre-ordering and transmittal of Local Service Requests ("LSRs") and electronic transmittal of Firm Order Confirmation ("FOCs") and order completions. EDI, like IMA, is operational and ready for use.

IMA and EDI should be evaluated based upon the actual competitive conditions in Arizona now and in the reasonably foreseeable future. See generally Second BellSouth Louisiana Order ¶ 54.

Functionalities

The IMA GUI and EDI electronic interfaces support preorder and order transactions in substantially the same time and manner as the OSS that U S WEST's retail units use. The transactions include:

(1) address validation;

(2) carrier listing;

(3) service availability;

(4) facility check;

(5) obtain CSR;

(6) telephone number selection;

(7) customer listing creation;

(8) billing number establishment;

(9) appointment scheduling;

(10) summary information review;

(11) order submission;

(12) supplemental order submission;

(13) order inquiry; and

(14) order completion.

The CLECs and the U S WEST retail unit use the same underlying OSS and product tables to process the specific transaction.

In most cases, the process utilized by the CLEC and the U S WEST retail unit are the same. For example, both the CLEC and the U S WEST retail unit can validate rural or descriptive addresses. For simple listings, both the CLEC and the U S WEST retail unit can enter the listing information electronically. Likewise, for installation of POTS services that require an appointment, both the CLEC and the U S WEST retail unit use the same OSS to reserve an appointment date and time for a technician to be dispatched. For those products and services that do not require an appointment, both the CLEC and the U S WEST retail unit use the same standard intervals.

Products supported by U S WEST's EDI and IMA electronic interfaces include: (1) POTS resale; (2) ISDN basic rate interface; (3) private line; (4) Centrex; (5) unbundled loop; (6) local number portability; (7) interim number portability; (8) unbundled loop with local number portability; (9) unbundled loop with interim number portability; and (10) unbundled line-side analog and digital switch port.

The IMA GUI and the EB-TA repair electronic interfaces developed for use by the CLECs support repair transactions for all products and services, (i.e., POTS and non-POTS) in substantially the same time and manner as the OSS used by the U S WEST

retail unit. These interfaces allow the CLEC and the U S WEST retail unit to create, inquire about, modify, cancel, authorize closure of, and receive status of trouble reports.

In many ways, U S WEST's OSS interfaces provide service superior to that which U S WEST's retail representatives enjoy. For example, a U S WEST retail service representative must determine from the end-user's location which of the many U S WEST's legacy systems to log onto. By contrast, IMA and EDI make that determination automatically for the CLEC.

Unlike Ameritech and BellSouth, U S WEST provides CLECs access to the same systems used by U S WEST retail service representatives to reserve due dates. CLECs, just like U S WEST, can reserve appointments during the preorder process. If an appointment is not required, the CLEC can give the end-user a due date using U S WEST's standard intervals, just as U S WEST's service representatives do. The process is exactly the same for U S WEST as it is for CLECs. Therefore, there can be no discrimination issue concerning the delivery of FOCs.

Similarly, there can be no issue of discrimination regarding jeopardy notices – a notification when a commitment regarding the installation of a facility cannot be met -- because U S WEST does not provide these notices to itself. Nevertheless, IMA does support sending some jeopardy notices to CLECs.

U S WEST provides order status to the CLECs in two ways. When the status on local service request changes, the IMA GUI and EDI will issue a transaction to the CLEC in the method requested by the CLEC. For example, if the CLEC is using the IMA GUI, certain statuses will be returned either through e-mail or by facsimile, and if the CLEC is using EDI, the status will be returned through an EDI transaction. In the alternative, the CLEC can issue a status query, either through the IMA GUI or EDI, and receive the updated status information. U S WEST provides order completion notices to CLECs in the same manner and at the same time as for itself.

For ordering and provisioning, U S WEST's OSS, including both IMA and EDI, have flow-through functionality -- i.e. automatic conversion of CLEC local service requests into service orders – for POTS resale orders, including "conversion-as-is" and "conversion-as-specified" and change orders. These types of orders are the most common orders that CLECs place with U S WEST. A U S WEST representative reviews these orders for accuracy to prevent errors that could result in orders falling out or not being processed. This review does not increase substantially the processing time, or contribute to errors. In fact, it benefits CLECs by identifying errors in advance of submittal of orders to the service order processors. U S WEST is in the process of eliminating the screening function and implementing complete flow-through for most resale products, unbundled loops (with and without number portability), and number portability.

Assistance to CLECs

U S WEST has devoted significant resources to providing CLECs with information and training about its OSS. It has developed new internal organizations devoted to assisting CLECs with resale, interconnection, and OSS issues. U S WEST also has assigned Account Managers to each CLEC to provide the CLEC with a single point of contact within U S WEST. It also provides help desks to assist CLECs with issues relating to interconnection, IMA access and deployment, and repair services.

Of course, U S WEST provides CLECs with the information they need to build their own OSS interfaces and provides numerous IMA training opportunities. U S WEST provides interface specifications to CLECs who want to build to the interfaces, and U S WEST dedicates technical teams to those CLECs to help them build the interfaces. U S WEST provides training sessions to CLECs to help them use the OSS interfaces and provides CLECs technical specifications, business rules, and other documentation to assist their use of the interfaces. In addition, U S WEST has provided a 24-hour help desk to assist CLECs.

Operational Readiness

U S WEST has implemented all necessary performance measures to ensure that U S WEST provides CLECs with nondiscriminatory access to OSS. These measures allow CLECs to confirm that they receive comparable access to U S WEST's OSS as U S WEST's retail representatives. The key measures U S WEST has developed and implemented in this area include system availability, access to interconnection provisioning and repair centers, and billing service indicators.

Finally, U S WEST has thoroughly tested the operational readiness of its OSS interfaces. U S WEST has thoroughly tested its interfaces to ensure that it is operationally ready and has more than adequate capacity to meet the competitive needs of CLECs today and in the foreseeable future. U S WEST has performed hardware capacity planning by sizing its systems to accommodate 10,000 computer transactions per CLEC, per week, per state, and continually assesses capacity demand. Furthermore, U S WEST has performed capacity load testing and determined that the IMA gateway is adequate to handle the largest transaction rate that was tested, namely 3,500 business transactions per hour. Lastly, U S WEST has performed process capacity planning and has staffed its Interconnect Service Center ("ISC") to respond to realistic, foreseeable demand. The ISC is presently handling actual demand, and those centers can be expanded to meet a higher demand.

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Respectfully submitted,

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