

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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

Docket No. T-00000~~B~~<sup>A</sup>-97-0238

AT&T AND TCG'S STATEMENT  
OF POSITION ON THE OSS  
COLLABORATIVE PROCESS

AT&T Communications of the Mountain States, Inc., and TCG Phoenix (collectively, "AT&T") hereby submit their initial comments on the Operations Support Systems ("OSS") collaborative process.

**I. INTRODUCTION**

On July 21, 1999, the Arizona Corporation Commission ("Commission") entered a Procedural Order, Decision No. 61837, that directed the Staff to conduct three workshops "to facilitate a collaborative process to determine OSS standards to satisfy the § 271 requirements." Decision No. 61837 at 5. The Procedural Order also ordered "that the collaborative process shall include third-party testing of OSS." *Id.* Finally, the Staff was required to file a Report no later than October 15, 1999, "setting forth the OSS standards with which U S WEST must comply, the extent to which U S WEST does comply, and recommendations for necessary changes/modifications for U S WEST to comply with the § 271 requirements."<sup>1</sup> *Id.*

<sup>1</sup> On September 2, 1999, the Hearing Officers indicated that a Procedural Order would be issued extending the date for filing the Report to October 29, 1999.

On August 25, 1999, the Staff released an agenda for the first workshop on U S WEST's OSS, along with a copy of a proposed Master Test Plan developed by the Staff's consultant, Doherty and Company, Inc. ("DCI"). The agenda requested that parties serve copies of their written Statement of Position on all parties by September 3, 1999.

AT&T has had limited time to prepare comments. However, it will attempt to provide high level comments on the Master Test Plan and the corresponding requirements that U S WEST's OSS must meet to satisfy its Section 271 obligations. These comments should not be considered as all-inclusive. Many of the OSS requirements are best addressed in a complete analysis of the Master Test Plan plan. Therefore, AT&T will raise additional OSS requirements in its written comments on the Master Test Plan and performance measurements filed September 17, 1999,<sup>2</sup> and discuss those requirements, including the requirements identified herein, at the second workshop to be held on September 20, 1999.

## II. COMMENTS ON THE TEST PLAN

**1. The collaborative test should also test whether U S WEST has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and whether U S WEST is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them.**

The overall purpose of the collaborative test process as stated in the Master Test Plan is to demonstrate "the extent of operational readiness, performance, and capability of U S WEST to provide CLECs with access to OSS". (Master Test Plan, p. 5). Operational readiness is only one part of two-part test that the FCC has developed.<sup>3</sup> The first part of the FCC's two part test is whether, "[U S WEST] has deployed the necessary systems and

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<sup>2</sup> Staff's agenda requested that written comments on the Master Test Plan and performance measurements be filed by September 13, 1999. At a hearing held on September 2, 1999, Staff agreed to extend the date for filing comments to September 17, 1999.

personnel to provide sufficient access to each of the necessary OSS functions and whether [U S WEST] is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them.”<sup>4</sup> In discussing its evaluation of a Bell Operating Company’s (“BOC”) compliance with of the first two parts, the FCC stated:

Under the first part of this inquiry, [U S WEST] must demonstrate that it has developed sufficient electronic and manual interfaces to allow competing carriers to access all of the necessary OSS functions. For those functions that [U S WEST] itself accesses electronically, [U S WEST] must provide equivalent electronic access for competing carriers. We recognize, however, that for some functions, manual access may need to remain available as an additional mode of access. [U S WEST] also is obligated to provide competing carriers with the specifications necessary to instruct competing carriers on how to modify or design their systems in a manner that will enable them to communicate with [U S WEST’s] legacy systems and any interfaces utilized by [U S WEST] for such access. [U S WEST] must provide competing carriers with all of the information necessary to format and process their electronic requests so that these requests flow through the interfaces, the transmission links, and into the legacy systems as quickly and efficiently as possible. In addition, [U S WEST] must disclose to competing carriers any internal "business rules," including information concerning the ordering codes that [U S WEST] uses that competing carriers need to place orders through the system efficiently. Finally, [U S WEST] must ensure that its operations support systems are designed to accommodate both current demand and projected demand of competing carriers for access to OSS functions.<sup>5</sup>

The proposed Master Test Plan contains very little, if any, considerations for the testing of the first part of the FCC’s two part test. Without those considerations, any test will be incomplete and will not be responsive to the FCC’s evaluation criteria. The Master Test Plan needs to evaluate the assistance that U S WEST provides to CLECs that attempt to access its OSS.

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<sup>3</sup> *Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan*, CC Docket No. 97-137, Memorandum Opinion and Order, FCC 97-298 (rel. Aug. 19, 1997), ¶ 136 (“*Ameritech Michigan Order*”).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at ¶ 137 (footnotes omitted).

**2. The Pseudo-CLEC should test the adequacy of the information, documentation and assistance that U S WEST provides to it during the development of the test transaction generator.**

It is already understood that a pseudo-CLEC will have to develop a working EDI interface. As part of that development, the pseudo-CLEC should also evaluate the adequacy of the documentation, assistance and information that U S WEST provides during the development of that interface. The pseudo-CLEC's evaluation of the assistance it is provided during the development of the interface can help ensure that the Commission can provide a recommendation that is responsive to the FCC's stated evaluation criteria.

The pseudo-CLEC should also evaluate the adequacy of the information, documentation and assistance that U S WEST provides for CLECs using the IMA and EB-TA interfaces. While the use of IMA does not require the development of a separate interface by the pseudo-CLEC, an evaluation by the pseudo-CLEC of the assistance provided by U S WEST in using the IMA interface, again would help the Commission provide a recommendation to the FCC that is responsive to the FCC's stated evaluation criteria.

Finally, the pseudo-CLEC should evaluate the assistance that U S WEST provides to CLECs to permit the CLECs to understand the U S WEST processes for obtaining interconnection and collocation. While the processes for collocation may be manual, the ordering and provisioning of collocation must still be considered part of U S WEST's OSS.

**3. The collaborative test is too limited in the types of services and facilities that will be tested.**

The Master Test Plan states that the "test will focus on resale, UNE-C, UNE-Loop, UNE-Loop with number portability, and number portability." (Master Test Plan, p. 6) There are other important services and facilities that should be added to the test. Interconnection and collocation are important elements to the success of local exchange competition in

Arizona that should be included in the scope of the test. A combination of unbundled loop and dedicated interoffice transport with and without number portability is also an important service that CLECs will be obtaining from U S WEST that should be included in the test. The test should also include orders for xDSL services and facilities. Due to the rapidly developing market for broadband and data services, U S WEST support for all types of xDSL services and facilities is vital to the development of competition and should be tested as fully as possible. In particular, access to loop qualification and U S WEST bandwidth management information must be tested, along with other xDSL specific systems. These are just a few of the additional services and facilities that should be included in the scope of the test.

**4. The Master Test Plan must state that all phases of the test must be open to all interested parties.**

CLECs should be given access to all materials and assistance provided by U S WEST to the third party, to ensure that the development of the third party can be duplicated by competitors in the real world. Minutes should be kept of all contacts between the third party and U S WEST and made available to the CLECs. An open process including CLEC monitoring of the test ensures that current versions of systems/documentation are being tested and ensures that the third party is not receiving assistance and cooperation that the CLECs will not be able to enjoy following Section 271 entry.

**5. U S WEST should commit that the performance levels achieved during the collaborative test will be maintained after the collaborative testing is completed and its compliance with this commitment should be evaluated.**

During the collaborative test, U S WEST will attempt to “put its best foot forward.” The opportunity and motive for U S WEST to let its performance slip after the completion of the collaborative test is great. One method of ensuring that U S WEST’s performance does not degrade after the collaborative test has been completed is to require that U S WEST’s

performance levels after the collaborative test should be at least equal to its performance levels during the collaborative test. In Texas, notwithstanding assurances from the third party tester, numerous failures have occurred during actual commercial usage of the interface.

**6. The Performance Measurement Evaluation should be completed before any other testing or evaluation is initiated.**

The performance measures will be the “yard stick” against which U S WEST’s OSS access to both itself and CLECs will be measured. It is critical that the parties know how accurate, reliable, and repeatable the “yard stick” is before they start using it to measure U S WEST’s OSS access. It is also important to know just what the “yard stick” is supposed to be measuring.

Wasted effort could be the result if other tests and evaluations are initiated using the unaudited U S WEST data collection, analysis and reporting processes. It serves no party if tests are performed only to find out later that the measurements used to evaluate the tests were unreliable or misunderstood. The performance measurement evaluation should be the first test or evaluation performed during the test.

**7. U S WEST’s list of performance measures and the descriptions of those measures in Appendix B should not be considered final.**

The reference on page 41 of the Master Test Plan to the list of U S WEST’s performance measurements contained in Appendix B appears to imply that the list is final. AT&T still has major concerns about how U S WEST defines its performance measurements. In particular, AT&T believes that there are several measurements where far too much relevant data is discarded as a result of self-serving U S WEST exclusions. In addition, some measures continue to be entirely missing. The performance measurements used in the collaborative test and the measurements should still be considered an open issue that is

subject to debate during the workshop process. In addition, the performance measures used in the functionality and capacity tests as identified in Appendix C should also be considered to be subject to debate during the workshops.

**8. Problems encountered during the test should be thoroughly documented as test exceptions, U S WEST should correct the problems and the problem component(s) should be retested.**

Once a problem has been uncovered, U S WEST should correct the problem and retesting should be performed to ensure that the problem has actually been resolved. The Master Test Plan on pages 28 – 29 appears to allow U S WEST to submit a written explanation of a problem instead of documented corrective action followed by retesting. Paper promises in the form of a written explanation are not sufficient evidence that U S WEST has corrected, or will correct the identified problem. Any test problems encountered should be corrected by U S WEST and then retested. Only then, will there be sufficient evidence that the problem has really been fixed.

**9. Capacity testing should clearly and explicitly include considerations of “stress volumes” to determine the ability of U S WEST to process a higher than normal volume of pre-order and order transactions in a timely manner.**

CLEC orders to U S WEST cannot be guaranteed to arrive in a steady stream. Marketing programs and introductions into new areas will often result in a spike in the number of orders that CLECs submit to U S WEST. To truly reflect actual market realities, the capacity test should include an evaluation of U S WEST’s ability to handle a surge in orders.

**10. The capacity testing should include considerations of the manual intervention that U S WEST requires for 100% of the CLEC orders.**

The Master Test Plan appears to assume that CLEC orders will flow through from the CLEC to U S WEST’s mechanized systems and interfaces. That is not the case. Every order

submitted by a CLEC to U S WEST requires some form of human intervention by U S WEST personnel. That human intervention takes the form of complete or partial retyping of the CLEC order, or manual review of the order. An accurate portrayal of U S WEST's ordering capacity must necessarily include considerations for the extensive manual intervention involved.

The Master Test Plan in section 6.11 does give some consideration to the manual processes involved in processing CLEC orders. However, that section inappropriately treats the manual intervention as a discrete item rather than as an integral part of U S WEST's ordering process. The manual processes should be included as part of the end-to-end testing process; not as a stand-alone process.

**11. In addition to testing by the pseudo-CLEC, the collaborative test effort should include considerations of actual commercial usage of the interfaces.**

The FCC has determined that "the most probative evidence that OSS functions are operationally ready is actual commercial usage."<sup>6</sup> While testing using the pseudo-CLEC developed interfaces has a significant role to play in the collaborative test, the Master Test Plan must also include actual commercial testing. For example, it will be necessary to begin testing of U S WEST's EDI interface through the use of a test transaction generator. Commercial testing must follow the pseudo-CLEC test.

### **III. CONCLUSION**

AT&T will continue to review the proposed Master Test Plan and provide additional comments and recommendations in its comments due on September 17, 1999. AT&T looks

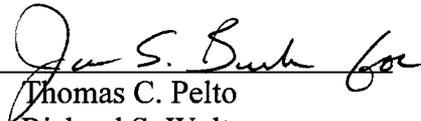
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<sup>6</sup> *Ameritech Michigan Order*, ¶ 138.

forward to working with the Staff, its consultant, DCI, and the parties to arrive at an acceptable test plan.

RESPECTFULLY SUBMITTED this 3rd day of September, 1999.

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## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T's and TCG's Statement of Position on the OSS Collaborative Process were filed this 3rd day of September, 1999, with:

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