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Arizona Corporation Commission

BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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AUG 15 2000

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AZ CORP COMMISSION  
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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-00000A-97-0238

AT&T AND WORLDCOM'S  
COMMENTS ON INCIDENT  
WORK ORDER PROCESS

AT&T, TCG Phoenix (collectively "AT&T") and WorldCom, Inc., on behalf of its regulated subsidiaries ("WCOM"), submit the following comments on the Testing Incidents Process, Appendix I, to the Test Standards Document, Version 2.7:

The Incident Work Order (IWO) process defines the procedures to identify and report an occurrence during the Qwest 271 test which requires a change to the following:

- Posted System Documentation
- System Software requiring a version upgrade release
- Major change(s) to current Qwest processes, procedures, or business rules

The IWO process describes the steps that would be invoked upon CGE&Y's discovery of a testing incident, but fails to establish the processes that CGE&Y (the Test Administrator or "TA") will employ to examine testing records, logs or other documentation that could be considered material or significant enough to warrant an Incident Work Order. Obviously, the predicate steps must be taken in order to decide that an event is a major incident.

To determine which Arizona testing events should be recorded as incidents that would be dealt with according to the IWO process in TSD Appendix I, AT&T and WCOM suggest the following guidelines:

- Entrance and Exit Criteria that the TA finds cannot be passed should be established as incidents. This guideline applies to each of the test sections, i.e., Friendlies, Functionality, Retail Parity, Capacity/Scalability, Relationship Management, Performance Measurement, Collocation/Interconnection.
- TA recommendations, which in the expert opinion of the TA will result in a failed test evaluation criteria will be recorded as Incidents. The TA opinion is to be based on the TA's concern that a Qwest practice, policy, performance or system characteristic will be the cause of the failed criteria.
- Findings of the TA that are made in the course of test which, in the expert opinion of the TA, may result in negative finding in the interim or final report to the ACC are to be referred to the TAG as quickly as possible. The opinion should be based on the TA's concern that a Qwest practice, policy, performance or system characteristic might result in a negative finding. TAG will decide whether to record the facts underlying the TA's opinion as an Incident at the time of presentation or whether to request monitoring and follow up by the TA.

Each of these guidelines are sufficient to raise questions whether it is necessary to change posted system documentation, system software or make major changes to current Qwest processes, procedures on business rules, and raise the incident to the level of a major incident.

In addition, AT&T and WCOM suggest that one additional guideline be added to warrant a submission of an IWO:

- TA established milestones that are determined to be in jeopardy are to be referred to the TAG as quickly as possible. This includes milestones that involve the work of the TA or the Pseudo-CLEC. The referral should include a brief written document describing the issues that are preventing or which are seen to be impeding progress

toward achieving the particular milestone(s). The TA will present the jeopardy situation at the next regularly scheduled TAG or at an emergency TAG, and the TAG will decide whether the jeopardy condition should be established as an incident.

During the last TAG, Qwest asked whether an incident that did not raise to the level of an IWO could be a “blemish” on its case. AT&T and WCOM’s response is, absolutely. CGE&Y is using its judgment in many cases to determine whether an IWO should be issued for a problem or recurring problem. Some CLEC, based on its judgment, may consider a problem to be as major, although CGE&Y did not. The logical question that came up at the TAG meeting was, how often should the CLECs be entitled see the daily logs maintained by CGE&Y to permit them to determine whether additional incidents should be classified as major, thus necessitating a work order.

It is AT&T and WCOM’s opinion that once a month is sufficient. First, there is no reason to assume that CGE&Y will fail to file IWO on major incidents, especially if AT&T and WCOM’s guidelines are followed. Second, providing logs on a daily basis will make analyses more time consuming and difficult. Trends or recurring problems are less likely to be discovered.

Receiving daily logs on a monthly basis will provide a better picture of testing events over a period of time. CLECs could be asked to bring any issues to the TAG’s attention before the next monthly batch of daily logs are provided. Hopefully, this would reduce the possibility of the CLECs raising “blemishes” at the end of the test. Providing the CLECs with the daily logs after the entire test is complete increases the likelihood that arguments over the severity of an incident are raised at the end of the test, not during the test. Therefore, AT&T and WCOM recommend that the CLECs have access to the daily logs on a monthly basis. Although this will

assist in reducing disagreements over the need for the issuance of an IWO, it should not be presumed that this will eliminate all disagreements.

RESPECTFULLY SUBMITTED this 11th day of August, 2000.

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## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T and WorldCom's Comments on Incident Work Order Process regarding Docket No. T-00000A-97-0238, were sent via overnight delivery this 14<sup>th</sup> day of August, 2000, to:

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