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Arizona Corporation Commission
DOCKETED

AUG 11 2000

Maureen Scott
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007-2996

DOCKETED BY

Re: **Arizona 271, Docket No. T-00000A-97-0238**

Dear Ms. Scott:

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T") are concerned about recent developments regarding the test of Qwest Corporation's (formerly U S WEST Communications, Inc., hereinafter "Qwest") Operation Support Systems ("OSS") in Arizona. AT&T has invested substantial resources on this OSS test. It is concerned that, for unexplained reasons, the OSS test is proceeding at an unrealistic pace in order to complete the test by the end of the year 2000. Recent developments suggest that the Master Test Plan ("MTP") and Test Standards Documents ("TSD") are not being adhered to and steps are being taken to enable the test to proceed expeditiously without regard to the unintended risks. It is not clear who is responsible for pushing for a year-end completion of the OSS test, nor has the merits of completing the test by year-end 2000 been openly debated and resolved by the Test Advisory Group ("TAG").

The apparent but undisclosed decision to complete the test by year-end has caused AT&T to request numerous times the latest proposed milestones for the test. The minutes of the May 22, 2000 TAG meeting note that Cap Gemini Telecom ("CGT") was asked to provide milestone updates at every TAG meeting. AT&T has been told repeatedly that they are being developed. Finally, on August 4, 2000, Mr. Matt Rowell of the Arizona Corporation Commission ("ACC") Staff stated that he forwarded the milestones to CGT by e-mail several times. AT&T received the latest proposed milestones after the close of business on August 9, 2000. A preliminary review of the milestones does not alleviate AT&T's concerns that the present OSS testing schedule is unrealistic.

It is necessary for the TAG to review the milestones regularly for two reasons: first, the TAG is entitled to see them. No party to the TAG can unilaterally establish the milestones. The MTP states that the ACC Staff will make a final decision only after the TAG fails to reach consensus on an issue. MTP § 2.2.2. Second, it is necessary to determine if the milestones are reasonable and realistic, based on current events and future expectations.

The milestones not only describe at a high level the dates for critical events for the OSS test, but the ACC Staff is also using the projected test completion date of the OSS test to establish other key dates for the Qwest Section 271 process. The Staff has relied on the December 2000 date as a basis for requiring the completion of the workshops on the Section 271 checklist items. Therefore, it is necessary to review the milestones to determine not only if the OSS test can be realistically completed by year-end, but whether it is reasonable to require the parties in the Section 271 proceeding to expend considerable resources to complete the Arizona workshop process on the checklist items by December 2000. As AT&T has explained numerous times, Colorado, Washington and Oregon are also conducting Section 271 workshops. Utah, Idaho, Iowa, South Dakota, Montana and Wyoming intend to conduct multistate workshops on the checklist items; these states also will have to conduct additional workshops or hold proceedings on state-specific issues. Thus, it is reasonable for AT&T to attempt to schedule workshop dates for all Section 271 proceedings based on realistic dates for completion of the Arizona and Regional Oversight Committee ("ROC") OSS tests.

On August 4, 2000, AT&T once again asked when the EDI test cases would be available for review by the TAG. A CGT representative responded that he did not believe it was necessary for the TAG to review the EDI test cases. This was, to say the least, a surprise to AT&T. AT&T reviewed the IMA GUI test cases and made numerous required changes that were ultimately integrated into the IMA GUI test cases by CGT. Even Qwest expressed concerns regarding the accuracy of the IMA GUI test cases, and only after repeated discussions and after the safeguards insisted on by the CLECs were implemented was Qwest allowed to see some of the test cases in order to raise Qwest's confidence level in the IMA GUI test cases.

For CGT to now suggest that the TAG need not review the EDI test cases is unacceptable. Not only has CGT repeatedly stated that TAG members would see the EDI test cases in response to TAG members' inquires, the lack of quality and accuracy of the IMA GUI test cases absolutely requires that the TAG review the EDI test cases. Finally, AT&T has still not seen the IMA GUI test scripts or the EDI test scripts. Frankly, it appears to AT&T that CGT's latest position appears to be based more on a desire to complete the test by December 2000 than on a desire to make sure the EDI test cases are accurate.

AT&T also learned that CGT intended to start the functionality test after only one month of performance data had been reviewed. As I stated at the TAG meeting on August 4, 2000, this is contrary to the MTP and TSD, and AT&T will not agree to any changes to the MTP or TSD to permit the functionality test to commence before the performance evaluation is successfully completed. This position is entirely reasonable, considering the provisions of the MTP and TSD on the Performance Measure Evaluation at issue were reached by the consensus of the TAG.

The MTP, among other things, requires a review of the performance measurement data for three consecutive months:

8.5.2 Historical Data Evaluation

US WEST will provide performance measurement raw data from a three consecutive month period. The Test Administrator will validate the

process and procedures and monitor U S WEST's ability to execute them. If appropriate, the Test Administrator will conduct interviews of U S WEST and/or CLEC personnel.

8.6 Performance Measurement Evaluation Entrance and Exit Criteria

The entrance criteria for this test include the U S WEST documented processes and procedures for the enumerated performance measurements listed in appendices B and C. *Exit criteria will include a final report that performance measurement collection, analysis and reporting processes as reviewed by CGT are fully compliant with the performance measurements contained in the PID.* Exiting this test will include a review session where all observed activities, data and results will be reviewed for validity. *The actual exit criteria will be an outcome report generated by the Test Administrator detailing observations regarding U S WEST's performance measurements.*

MTP §§ 8.5.2 and 8.6 (emphasis added).

The TSD also supports the need to review 3 consecutive months of historical data.

7.3.3 Historical Data Review

The TA will request the three most current consecutive months of retail and CLEC historical raw data (before exclusions) and U S WEST computed Performance Measures. Upon receiving the data, the TA Statistics Team will perform an independent computation of a representative sample of all Performance Measurements, Z statistics and other computations, averages, standard deviations, rates, proportions, sample sizes, etc. from U S WEST provided raw data. The TA will compare the independently computed data to the Z statistics and other computations computed by U S WEST.

The TA will evaluate, document and report all differences between the numbers computed by U S WEST and those computed by the TA. *Problems discovered requiring work by U S WEST, will be entered on Incident Work Order forms and forwarded to the Test Advisory Group (TAG) for subsequent prioritization and submittal to U S WEST for repair and subsequent re-testing per the Test Administrator's Testing Incidents Process (see Attachment I).*

In addition, the historical evaluation will also investigate the presence of potentially confounding factors that may need to be further controlled in the design and analysis of the functionality tests.

TSD § 7.3.3 (emphasis added).

One of the entrance criteria of the Performance Measure Evaluation is that at least two months of data are available for the evaluation to begin. TSD § 7.4(a). Therefore, the evaluation should not have begun until CGT had at least 2 of the 3 months of required data in its possession. The TSD also provides specific exit criteria for the Performance Measure Evaluation. All the collected data must be collected and analyzed by CGT, all performance measures must have passed the evaluation and/or all parties must agree the test is concluded. TSD § 7.5. *See* TSD § 7.3.3 above for the required analysis.

The TSD also established specific entrance criteria for functionality testing. Prior to testing of preordering, the following information must be confirmed:

The Performance Measurement Evaluation process *has been successfully passed for all relevant Performance Measures*. The TA will organize Functionality Testing into a number of test phases by mapping Test Cases/Scripts to Performance Measures that have been successfully passed the process audit. Testing can then begin for Test Cases/Scripts that map only to Performance Measures that have passed the required audits.

TSD § 3.7.4.3(c)(5). *See also* TSD §§ 3.7.5.3(a) for ordering/provisioning entrance criteria. It is obvious that functionality testing cannot be completed with a simple review of 1 month of raw data.

TSD § 7.3.3 also requires CGT to submit Incident Work Order (“IWO”) forms for all problems it discovers. The IWO must be forwarded to the TAG. It is my understanding that CGT has encountered problems with the first month of data. This is consistent with the ROC’s experience. AT&T is not aware of any IWOs being forwarded by CGT to the TAG as a result of any problems.

It has been suggested that the audit plan allows the functionality test to commence after one month of raw data has been reviewed. AT&T disagrees. The MTP and TSD are the operative documents. MTP § 2.3; TSD § 1.1. The parties spent months formulating these documents. Audit guidelines cannot supersede these documents. Moreover, if a party wishes to change the MTP or TSD, it is necessary to go through the established change control processes. This has not been done to AT&T’s knowledge. In fact, the TSD was going through review of the latest version (v2.6) when the audit plan was distributed by Staff and CGT on July 6, 2000. The final version (v2.7) was released June 24, 2000. No attempt was made by Staff or CGT to conform the MTP or TSD to the audit plan. The audit plan was drafted by DCI, ACC’s consultant, CGT and the ACC without the input of the TAG and released in response to an action item. (MIL AI 04 13-09). Staff’s June 1, 2000 e-mail transmittal of the final audit plan to CGT stated that CGT should distribute the plan to the TAG for “informational purposes.” The audit plan was not submitted to the TAG for approval. It is the ACC’s role to ensure the MTP and TSD are followed, and it is DCI’s role to assist the ACC in its role. Therefore, it is somewhat disconcerting that the ACC and DCI would release an audit plan that does not conform to the MTP and TSD.

AT&T and the parties spent considerable time establishing the MTP and TSD. AT&T has been very flexible during these processes. An argument was raised that the test could not proceed without the MTP being approved by the Administrative Law Judge. AT&T agreed that, under certain circumstances, the test could proceed without formal

approval of the MTP. Many issues addressed in the TSD arguably should have been contained in the MTP. AT&T did not object to addressing these issues in the TSD as a concession to Staff to allow Staff to file the MTP with Docket Control to initiate the formal approval process for the MTP. However, AT&T will not agree to change what it believes are necessary requirements and conditions of the OSS test itself. It should also be noted that the MTP and TSD are essentially consensus documents. Very few issues were escalated to the ACC Staff for resolution.

AT&T insists that the MTP and TSD be followed at all times. If the ACC does not require CGT to comply with the MTP and TSD, the results of the test will be useless. It will not be possible to re-write the MTP and TSD after the test is complete to conform them to the manner in which the test was actually conducted. Furthermore, it is not AT&T's obligation to ensure the test is conducted in accordance with the MTP and TSD. Accordingly, AT&T can raise noncompliance issues at any time during or after the test.

Finally, AT&T is concerned that the spirit of openness is being subordinated to the need to complete the test by the end of the year 2000. It is not AT&T's obligation to monitor and guarantee that the MTP and TSD are being complied with by CGT, Hewlett-Packard or Qwest. Had the issue of the review of the test scripts and EDI test cases not been raised by AT&T on August 4, 2000, it is likely the test would have proceeded without TAG review. CGT has not submitted any IWOs to the TAG on the Performance Measure Evaluation, although problems have been encountered and acknowledged by Staff. Problems are supposed to be resolved by the TAG, not CGT and Qwest. The failure of CGT to provide TAG with revised milestones promptly and on a regular basis also concerns AT&T, because this was specifically requested in a TAG meeting months ago. In addition to the concerns raised earlier, CLECs are taking facilities out of inventory to make them available for use in the test. It would be very helpful to know when these facilities will once again be available for paying customers.

AT&T believes that everyone should want, and insist, that the OSS test be conducted and completed consistent with the MTP and TSD. The overall integrity of the test is more important than the completion of the test itself. This may be the appropriate time for Staff to thoroughly assess the present status of the OSS test and obtain the TAG members' assessment on the revised milestones at the next scheduled TAG meeting on August 21, 2000.

If you wish to discuss any of AT&T's concerns further, feel free to call me.

Sincerely,



Richard S. Wolters

RSW/crd

cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of the Letter from Richard S. Wolters on behalf of AT&T Communications of the Mountain States, Inc. to Maureen Scott of the Arizona Corporation Commission regarding Docket No. T-00000A-97-0238, were sent via overnight delivery this 10th day of August, 2000, to:

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