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ARIZONA CORPORATION COMMISSION
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Arizona Corporation Commission
DOCKETED

JAN 24 2001

Maureen Scott
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1200 West Washington
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DOCKETED BY 

Re: **Arizona 271, Docket No. T-00000A-978-0238**

Dear Maureen:

It is AT&T Communications of the Mountain States, Inc.'s ("AT&T") position that the Functionality Test entrance criteria relating to the successful passing of the Performance Measurement Evaluation ("PME") has not been met, and the Functionality Test for Phases I and II should not have commenced. In fact, Cap Gemini Ernst & Young's ("CGE&Y") findings in the December 8, 2000, Qwest Performance Measurement Audit: Interim Report ("PMAIR") with respect to the PME demonstrate that significant problems exist with Qwest's performance measurement data collection and analysis processes. Consequently, AT&T believes that Phases I and II of the Functionality Test were prematurely started.

As the Arizona Corporation Commission ("ACC") Staff recognized in its *PMA Impasse - MIL Issue No. 926* (September 28, 2000) document, the PME has four distinct components consisting of the following:

- PM Process Review
- Historical Data Evaluation
- Functionality Test Evaluation
- Capacity Test Evaluation.¹

These four distinct PME components are referenced in the Master Test Plan for Testing U S WEST's Operations Support System in Arizona, Version 4.0 (April 6, 2000) ("MTP") and are more specifically identified and explained in Sections 7.3.2 Performance Measurement Process Audit/Review, 7.3.3 Historical Data Review, 7.3.4

¹ *PMA Impasse - MIL Issue No. 926* (September 28, 2000), at 1, referencing Section 8.1 of the Arizona Master Test Plan, Version 4.0.

The Arizona Test Standards Document, Version 2.7 (June 24, 2000) (“TSD”) makes several references to the successful passing of the PME as an entrance criterion for the Functionality and Capacity Tests. Those specific references are:

- All Order and Provisioning Performance Measurements have been tested and successfully passed (TSD Section 3.7.5.3, at 3-13, identifying one of the entrance criteria for the ordering and provisioning Functionality Test).
- Maintenance and Repair Performance Measurement process evaluations have been successfully passed (TSD Section 3.7.6.3, at 3-18, identifying one of the entrance criteria for the maintenance and repair Functionality Test).
- The Performance Measurement Evaluation of billing measures has been passed (TSD Section 3.8.3, at 3-22, identifying one of the entrance criteria for the billing Functionality Test).
- The Performance Measurement process evaluation has been successfully passed (TSD Section 5.2.3, at 5-10, identifying one of the entrance criteria for the system capacity test).

While the exact language for the above references differs slightly, the intent is the same; the relevant measurements must pass an evaluation before the specified test can begin. AT&T numerous times during TAG meeting stated that the PME was an entrance criterion for the Functionality Test. The question subsequently raised was, what part of the PME must be passed in order to start the Functionality and System Capacity Tests?

AT&T’s answer, and the position it has maintained throughout the development of the MTP and the TSD, is that the first two parts of the PME (the PM Process Review and the Historical Data Evaluation) must be successfully passed before the Functionality and Capacity Tests can begin. With respect to the Functionality Test Evaluation and the Capacity Test Evaluation, AT&T agrees with the Staff’s conclusion that, “it would be impossible to do the full PME before Functionality Testing began, since phases 3 and 4 of the PME are to be done during the Functionality and Capacity Tests respectively.”² AT&T does not disagree with Staff’s logic that “the third and fourth portions of the PME must be done during Functionality and Capacity Testing, and therefore, they obviously cannot have been intended by TAG members to be entrance criteria to the Functionality Test.”³ AT&T also agrees with Staff’s interpretation that, “[m]any portions of both the MTP and TSD reference the Process Audit as being an entrance criteria, therefore, there is little doubt that the parties intended it to be so.”⁴ Finally, AT&T agrees with Staff’s conclusion that, “there must be some historical data review in order to validate Qwest’s processes and procedures for the collection of data and the computation of performance measures.”⁵ However, regardless of Staff’s decision in *PMA Impasse - MIL Issue No. 926* regarding the Historical Data Evaluation, Qwest has not successfully passed the

² *Id.*, at 6.

³ *Id.*, at 7.

⁴ *Id.*

⁵ *Id.*

measures.”⁵ However, regardless of Staff’s decision in *PMA Impasse - MIL Issue No. 926* regarding the Historical Data Evaluation, Qwest has not successfully passed the PMA Process Review, or audit, although Staff found the Process Review to be an entrance criterion to the Functionality Test.

Some parties have attempted to justify starting the Functionality and Capacity Tests before completion of the PM Process Review and Historical Data Evaluation based on language in the MTP:

- “4.7.3.2 Test Execution Entrance Criteria [for the Functionality Test]
- -
 -
 - Sufficient establishment of the Arizona Performance Measures.
 - The Test Administrator has sufficiently completed its evaluation of the U S WEST processes for data collection and calculation of the Arizona Performance Measures.”⁶
 -
 -
 -

- “6.7.3.2 Test Execution Entrance Criteria [for the Capacity Test]
- -
 -
 - Performance Measures process sufficiently evaluated by the Test Administrator”⁷

The TSD requires that the PME be “successfully passed” as an entrance criteria to the Functionality Test and Capacity Test.⁸ Parties, including Qwest, subsequently argued that the PME need not be “successfully passed,” only that the PME is “sufficiently completed.” AT&T argues that no such ambiguity exists. Although the MTP language may have been less than crystal clear, the parties collaboratively added the required clarity to the TSD.

When the MTP and TSD were being developed, there were ongoing discussions and negotiations concerning the performance indicator definitions (“PIDs”). During the PID discussions, it became clear that there were a few PIDs that would require several months for Qwest to develop. It also became clear that Qwest had completed or was near completion on the development of the majority of the PIDs. While recognizing that the successful passing of a performance measurement audit was a legitimate Functionality Test and Capacity Test entrance criteria , Qwest was greatly concerned that the CLECs would attempt to argue that no Functionality Test cases could start until all of the PIDs had successfully passed the audit.

⁵ *Id.*

⁶ MTP, § 4.7.3.2, at 28.

⁷ *Id.*, § 6.7.3.2, at 41.

⁸ *Id.*, §§ 3.7.4.3(c)(5) and 5.2.3(e), respectively.

performance measurements had not passed the audit. To accommodate the fact that there were some performance measurements that would not be developed for several months, the parties agreed that the Functionality Test could be conducted in phases. The first phase would include the test cases for which the PME had been successfully passed. Subsequent phases for other test cases could proceed as the additional measures related to those test cases passed the audit.

To reflect that agreement, two changes were made in the MTP. Both changes were concerned with the addition of the "sufficiently evaluated" language to the Functionality and Systems Capacity Test entrance criteria. The intent of the "sufficiently evaluated" language was to indicate that 100% of the PIDs did not have to pass the PME before any portion of the Functionality Test and Capacity Test could be started. AT&T never intended for the language to mean that inadequate findings related to a PID were "close enough," and that the Functionality Test cases that rely on that PID could commence.

After completion of the MTP, the TAG commenced the task of completing the more detailed TSD. In the TSD, any question of a conflict between the "sufficiently evaluated" and "successfully passed" entrance criteria language was eliminated. One of the TSD entrance criteria for the Functionality Test states:

"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 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."⁹

The TSD further amplified the relationship between the performance measurements audit, the Functionality and System Capacity Tests entrance criteria and the phased approach for passing the performance measurement audit and the start of the Functionality Test, when it stated, "[t]he interim report for the PME Process Audits may be produced in two phases to allow Functionality Testing to begin based on performance measures already in operation with a second report produced and approved for those performance measures being developed by U S WEST."¹⁰

The TSD language is crystal clear: to start a Functionality Test case, all of the performance measurements related to that test case must successfully pass the process audit. The TSD language relating to the performance measurements and Functionality and System Capacity Tests entrance criteria clarified what was agreed to in the development of the MTP.

⁹ Arizona TSD, § 3.7.4.3.c.5, at 3-11 (emphasis added).

¹⁰ *Id.*, § 7.3.6, at 7-10.

It should also be noted that the TSD contains no reference to the “sufficiently evaluated” language that was found in the MTP. The reason for its absence is that the Functionality and System Capacity Test entrance criteria references in the TSD to “successfully passed” and “phased approach” more clearly and accurately reflect the position adopted by the TAG. Given the deliberate wording used in all other places in the documents on this issue, the references to “successfully passed” or “has been passed” negate any argument that a test case could commence prior to all of the associated performance measures having “successfully passed” the audit. If any party had believed that a Functionality Test case could begin with an associated performance measurement that had failed to successfully pass the performance measurement audit, it could have added such language in the entrance criteria sections of the TSD.

AT&T believes the correct interpretation of the relationship of the performance measure evaluation audit as an entrance criterion for the Functionality Test is as follows:

1. In order to start a Functionality Test case, all of the PIDs associated with that test case must have successfully passed a performance measurement audit.
2. For the purposes of the Functionality and Systems Capacity Test entrance criteria, the performance measurement audit would include the Performance Measurement Process Audit/Review described in TSD Section 7.3.2.¹¹

With the functionally and capacity test entrance criteria clearly stating that, before a Functionality or System Capacity Test case can begin, all of the associated PIDs must have successfully passed a performance measurement audit, the sheer number of open incident work orders (“IWO”) preclude a finding that any of the measures have successfully passed the performance measurement audit. Every one of Phase I and Phase II PIDs had at least one open IWO as of the date of the PMAIR. For ease of reference, a list of the Phase I and Phase II PIDs and the IWO status as of December 8, 2000, is attached to this letter as Attachment A.

The number of open IWOs for the Phase II PIDs at the time of the PMAIR is particularly startling. The Phase II PIDs are the critical provisioning-related measurements. Each of the four Phase II PIDs had no fewer than ten open IWOs at the time of the PMAIR. One of the measures had twelve open IWOs at the time of the PMAIR. What must also be noted is that at the time of the PMAIR, few of the IWOs associated with the Phase II PIDs had been closed. Three of the four Phase II PIDs had only one IWO that was closed and one of the PIDs had two closed IWOs.

¹¹ AT&T has also argued and continues to maintain that the Historical Review in Section 7.3.3 of the TSD must also be completed for the relevant measures before Functionality Test cases may be started. This has created some controversy. Regardless on the merits of AT&T’s position on the Historical Data Review or the suggested ambiguity in the MTP or TSD on this issue, there is no ambiguity that the PM Process Review must be successfully passed for the relevant measures before the Functionality Test cases may start. Even Staff came to this same conclusion.

Of the eleven Phase I PIDs, nine had at least three open IWOs. Of the two remaining Phase I PIDs, one had two open IWOs and the other one open IWO. As with the Phase II PIDs, Qwest is not working to correct the identified deficiencies. Five of the Phase I PIDs had no closed IWOs and the other six Phase I PIDs had only one closed IWO associated with it.

During its evaluation, CGE&Y identified problems with every Phase I and II PID. The sheer volume of open IWOs per PID clearly demonstrates that, at the time of the PMAIR, Qwest had not corrected those deficiencies. AT&T recognizes that some IWOs are more significant than others, and concedes that a PID may not need to have every IWO closed before a PID is considered to have successfully passed the audit; however, even weighting the number and significance of open IWOs, AT&T believes Qwest has not even come close to successfully passing the audit. Consequently, AT&T disagrees with CGE&Y's conclusion that:

Fifteen measures apply to Phase I and II of Functionality Testing. All of these measures have been tested using three or more months of data; all have passed the process evaluation and historical data analysis portion of the audit, with CGE&Y's determination that the necessary raw data is captured and can be recovered.¹²

It is beyond comprehension to conclude that a PID with fourteen open IWOs has passed the process evaluation portion of the audit.

CGE&Y appears to base its conclusion not on a finding that Qwest passed the audit for the individual measures, but on a determination that while Qwest may not be able to produce PID compliant results or successfully pass a process audit, the raw data is and will be available to eventually produce PID compliant results. The CGE&Y concept of "data recoverability" as a substitute for Qwest actually passing the audit can be found nowhere in either the MTP or TSD. The issue is whether Qwest is actually producing PID compliant results. The issue is not whether Qwest has the potential to produce PID compliant results.¹³ The purpose of the PME is described in the MTP is, "to verify that U S WEST is properly collecting and using data when computing the results of performance measures."¹⁴ The MTP also states, "[t]hose measurements will also be evaluated during the Performance Measurement Evaluation to verify that U S WEST is collecting adequate data and computing accurate results."¹⁵

AT&T also disagrees with CGE&Y's conclusion that, "[a]ll measures necessary for Phase I and II of Functionality Testing have been successfully audited."¹⁶ Although

¹² PMAIR, Executive Summary (December 8, 2000) at V.

¹³ AT&T also has some concerns based on the PMAIR and IWOs whether Qwest has the potential to produce PID complaint results.

¹⁴ MTP, § 3.3.5, at 16 (emphasis added).

¹⁵ *Id.*, § 8.2, at 54 (emphasis added).

¹⁶ PMAIR, Executive Summary (December 8, 2000) at VII.

CGE&Y may have considered its audit activity successful, the number of open IWOs precludes a conclusion that each of the Phase I and II PIDs have successfully passed the audit and demonstrates that Qwest is not properly collecting and using data when computing the results of performance measures.

AT&T believes that, although the decision to prematurely start the Functionality Test may have seemed expeditious to CGE&Y and Staff, ultimately, that decision may unnecessarily extend the duration of the test and/or negatively impact the integrity of the results. In the near future, Qwest-produced retail results will be necessary to make pass/retest decisions on many of the Functionality Test cases. Since Qwest has not successfully passed the audit for the phase I and II PIDs, the Qwest produced retail results cannot be relied upon to be accurate, audited results. Consequently, until Qwest has successfully passed the audit for the individual PIDs, in order to make those pass/fail decisions for some of the Functionality Test cases, CGE&Y must be the party that produces the required results using the Qwest raw data.

Since the first two phases of the Functionality Test have commenced, the TAG shortly will be faced with a decision as to whether the entrance criteria for the Functionality Test Phases III and IV have been met. AT&T urges the Staff to apply the correct performance measurement audit standard for those two phases. That is:

1. In order to start a Functionality Test case, all of the PIDs associated with that test case must have successfully passed a performance measurement audit.
2. For the purposes of the Functionality Test and Systems Capacity Test entrance criteria, the performance measurement audit should include the Performance Measurement Process Audit/Review described in TSD Section 7.3.2, and the Historical Data Review described in TSD Section 7.3.3.

Sincerely,



Richard S. Wolters

Enclosure

cc: Service List

Attachment A
 Arizona Test of Qwest's OSS
 Qwest Performance Measurement Audit: Interim Report
 Version 2.0 December 8, 2000
 Analysis of Phase I and Phase II PID Incident Work Order Status as of
 December 8, 2000¹

PID	PID Description	Open IWO's as of 12/8/00	Closed IWO's as of 12/8/00
Phase I PIDs			
GA-1	Gateway Availability - IMA-GUI	3	0
GA-2	Gateway Availability - IMA-EDI	3	0
PO-1	Pre-Order/Order Response Times	3	1
PO-2	Electronic Flow-Through	4	1
PO-3	LSR Rejection Notice Interval	3	1
PO-4	LSRs Rejected	3	1
PO-5	Firm Order Confirmations (FOCs) On Time	3	1
PO-6	Work Completion Notification Timeliness	3	1
PO-7	Billing Completion Notification Timeliness	2	0
PO-8	Jeopardy Notice Interval	1	0
PO-9	Timely Jeopardy Notices	3	0
Phase II PIDs			
OP-3	Installation Commitments Met	11	1
OP-4	Installation Interval	11	2
OP-5	New Service Installation Quality	12	1
OP-6	Delayed Days	10	1

¹ It should be noted that many of the IWOs created by CGE&Y were applicable to more than one PID. The above analysis is intended to show the number of open and closed IWOs per PID; it is not intended to show the total number of open and closed IWOs. The source document for the analysis was the *Qwest Performance Measurement Audit: Interim Report, Executive Summary, December 8, 2000, Table II.*

CERTIFICATE OF SERVICE

I certify that an original and 10 copies of a letter from Richard S. Wolters of AT&T to Maureen Scott objecting to commencement of the Functionality Test for Phases I and II in Docket No. T-00000A-97-0238 were sent by overnight delivery on January 23, 2001 to:

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and a true and correct copy was sent by U. S. Mail, postage prepaid, on January 23, 2001 to:

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