



0000009256

RECEIVED

ORIGINAL

2001 FEB 13 P 4: 20

AZ CORP COMMISSION
DOCUMENT CONTROL

BEFORE THE

ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission
DOCKETED

FEB 13 2001

DOCKETED BY *CCP*

WILLIAM A. MUNDELL
CHAIRMAN

JIM IRVIN
COMMISSIONER

MARC SPITZER
COMMISSIONER

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

**RHYTHMS LINKS, INC.
RESPONSE TO STAFF'S INFORMATION
REQUEST FOR DISCOVERY**

Rhythms Links, Inc. ("Rhythms") hereby responds to the Arizona Corporation Commission ("Commission") staff's informal request for discovery.

REQUEST:

Rhythms was asked by Commission staff to describe the specific problems it has had with Qwest in deploying and installing POTS splitters in Qwest's Arizona central offices in order to support line-sharing.

1 **RESPONSE:**

2 Although Qwest represented to the FCC that it had completed a quality check of all
3 its POTS splitter installations in all its central offices, in December, 2000, Rhythms began
4 experiencing large numbers of rejected line-sharing orders in the State of Arizona going to
5 particular central office splitter installations. This indicated to Rhythms that there were
6 wiring problems in the particular central offices. Because Rhythms has opted to install
7 POTS splitters in its own collocation area, it must coordinate with Qwest when it checks
8 the installations because the problem can be located in Rhythms' collocation space or it
9 can be a problem with Qwest's wiring at the frame. Rhythms immediately requested a
10 "vendor meet" where Qwest central office technicians would meet a Rhythms' technician
11 to inspect the central office installation and determine what the trouble was and to isolate
12 its location. Vendor meets were requested for the following central offices:
13 PHNXAZSY, CHNDAZMA, CHNDAZWE, PHNXAZNW, SCDLAZSH, MESAAZGI,
14 PHNXAZEA, PHNXAZCA, SCDLAZTH, TEMPAZMA, PHNXAZGR. A few vendor
15 meets were scheduled for December for the most problematic central offices. Qwest
16 missed each of the scheduled vendor meets.

17 In January, Rhythms again requested vendor meets to identify and resolve the
18 problems at these central offices. A number of vendor meets were scheduled for January
19 29-30, based entirely on dates and times chosen by Qwest. Again, Qwest missed each of
20 the vendor meets. A chart of those meetings is attached as Exhibit A. During this time
21 period, all the line-sharing orders that were submitted by Rhythms to these central offices

1 were being held. Rhythms repeatedly attempted to contact the Qwest account team, but
2 because of the intervening holidays and personnel turnover on the Qwest account team
3 dedicated to Rhythms, no one from Qwest responded to these inquiries.
4

5 After the latest round of vendor meets were missed by Qwest, Qwest responded to
6 Rhythms' complaints. The Qwest account team rescheduled the vendor meets and sent a
7 product team representative to Arizona to supervise the meetings. At that time, most of
8 the central office installations were re-certified and it was determined that either there was
9 no trouble or the trouble was located in the Rhythms collocation cage. However,
10 Rhythms and Qwest found that there were two central offices with wiring problems at the
11 frame: At PHNXAZNW the frame was misstenciled; and SCDLAZSH was incorrectly
12 wired and misstenciled at the frame. In all, it took approximately 60 days to recertify the
13 Rhythms splitter installations in Arizona, and during that time Rhythms did not have any
14 of its line-sharing orders provisioned.
15
16

17 Respectfully submitted this 12th day of February, 2001.

18 LEWIS AND ROCA

19 

20 Thomas H. Campbell
21 40 N. Central Avenue
22 Phoenix, Arizona 85007

23 - AND -

24 Douglas Hsiao
25 Rhythms Links Inc.
26 6933 S. Revere Parkway
Englewood, CO 80112
Attorneys for Rhythms Links Inc.

1 ORIGINAL and ten (10)
2 copies of the foregoing filed
3 this 12th day of February, 2001,
4 with:

5 Arizona Corporation Commission
6 Docket Control – Utilities Division
7 1200 W. Washington Street
8 Phoenix, Arizona 85007

9 COPY of the foregoing hand-
10 delivered this 12th day of February,
11 2001, to:

12 Maureen Scott
13 Legal Division
14 Arizona Corporation Commission
15 1200 W. Washington Street
16 Phoenix, Arizona 85007

17 Jane Rodda, Administrative Law Judge
18 Arizona Corporation Commission
19 1200 W. Washington Street
20 Phoenix, Arizona 85007

21 Deborah Scott, Director
22 Utilities Division
23 Arizona Corporation Commission
24 1200 W. Washington Street
25 Phoenix, Arizona 85007

26 COPY of the foregoing mailed
this 12th day of February, 2001, to:

Mark J. Trierweiler
Vice President – Government Affairs
AT&T Communications of the
Mountain States
111 West Monroe, Suite 1201
Phoenix, Arizona 85003

Scott Wakefield
Residential Utility Consumer Office
2828 N. Central Avenue
Phoenix, Arizona 85004

Maureen Arnold
US West Communications, Inc.
3033 N. Third Street
Room 1010
Phoenix, Arizona 85012

- 1 Mark Dioguardi
- 2 Tiffany and Bosco PA
- 3 500 Dial Tower
- 4 1850 N. Central Avenue
- 5 Phoenix, Arizona 85004

- 6 Thomas L. Mumaw
- 7 Snell & Wilmer
- 8 One Arizona Center
- 9 Phoenix, Arizona 85004-0001

- 10 Andrew O. Isar
- 11 TRI
- 12 4312 92nd Avenue N.W.
- 13 Gig Harbor, Washington 98335

- 14 Michael Patten
- 15 Brown & Bain, P.A.
- 16 2901 N. Central Avenue
- 17 Phoenix, Arizona 85012

- 18 Darren S. Weingard
- 19 Stephen H. Kukta
- 20 Sprint Communications Co., L.P.
- 21 1850 Gateway Drive, 7th Floor
- 22 San Mateo, CA 94404-2467

- 23 Timothy Berg
- 24 Fennemore, Craig, P.C.
- 25 3003 N. Central Avenue
- 26 Suite 2600
- Phoenix, Arizona 85012-3913

- 18 Thomas M. Dethlefs
- 19 Charles Steese
- 20 US West, Inc.
- 21 1801 California Street, Ste. 5100
- 22 Denver, Colorado 80202

- 21 Joan S. Burke
- 22 Osborn & Maledon
- 23 2929 N. Central Avenue
- 24 21st Floor
- 25 Phoenix, Arizona 85067-6379

- 24 Richard S. Wolters
- 25 AT&T & TCG
- 26 1875 Lawrence Street
- Suite 1575
- Denver, Colorado 80202

- 1 Michael M. Grant
Todd C. Wiley
- 2 Gallagher & Kennedy
2600 N. Central Avenue
- 3 Phoenix, Arizona 85004-3020

- 4 Richard M. Rindler
Morton J. Posner
- 5 Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
- 6 Washington, D.C. 20007-5116

- 7 Mary Tee
Electric Lightwave, Inc.
- 8 4400 NE 77th Avenue
Vancouver, Washington 98662

- 9 Raymond S. Heyman
- 10 Roshka Heyman & DeWulf
Two Arizona Center
- 11 400 Fifth Street
Suite 1000
- 12 Phoenix, Arizona 85004

- 13 Diane Bacon, Legislative Director
Communications Workers of America
- 14 5818 North 7th Street
Suite 206
- 15 Phoenix, Arizona 85014-5811

- 16 Charles Kallenback
ACSI
- 17 131 National Business Parkway
Annapolis Junction, Maryland 20701

- 18 Bradley Carroll, Esq.
- 19 Cox Arizona Telcom, L.L.C.
1550 West Deer Valley Road
- 20 Phoenix, Arizona 85027

- 21 Joyce Hundley
United States Department of Justice Antitrust Division
- 22 1401 H Street, N.W.
Suite 8000
- 23 Washington, D.C. 20530

- 24 Daniel Waggoner
Davis Wright Tremaine
- 25 2600 Century Square
15011 Fourth Avenue
- 26 Seattle, Washington 98101-1688

- 1 Alaine Miller
- 2 NextLink Communications, Inc.
- 3 500 108th Avenue NE, Suite 2200
Bellevue, Washington 98004
- 4 Carrington Phillips
- 5 Cox Communications
- 6 1400 Lake Hearn Drive N.E.
- 7 Atlanta, Georgia 30319
- 8 Mark N. Rogers
- 9 Excell Agent Services, L.L.C.
- 10 2175 W. 14th Street
- 11 Tempe, Arizona 85281
- 12 Thomas F. Dixon
- 13 WorldCom, Inc.
- 14 707 17th Street
- 15 Suite 3900
- 16 Denver, CO 80202
- 17 Robert S. Tanner
- 18 Davis Wright Tremaine LLP
- 19 17203 N. 42nd Street
- 20 Phoenix, Arizona 85032
- 21 Mark P. Trinchero
- 22 Davis Wright Tremaine LLP
- 23 1300 S.W. Fifth Avenue, Suite 2300
- 24 Portland, Oregon 97201
- 25 Gena Doyscher
- 26 Global Crossing Local Services, Inc.
- 1221 Nicollet Mall
- Minneapolis, Minnesota 55403-2420
- Penny Bewick
- New Edge Networks, Inc.
- P.O. Box 5159
- Vancouver, WA 98668
- Karen Clauson
- Eschelon Telecom, Inc.
- 730 2nd Avenue S., Suite 1200
- Minneapolis MN 55402

1 Andrea P. Harris, Senior Manager, Regulatory
2 Allegiance Telecom, Inc.
3 P.O. Box 2610
4 Dublin, CA 94568

4 Joe Loehman, Managing Director-Regulatory
5 SBC Telecom, Inc.
6 5800 Northwest Parkway
7 Suite 135, Room I.S. 40
8 San Antonio, TX 78249

7 M. Andrew Andrade
8 5261 S. Quebec Street
9 Suite 150
10 Greenwood Village, CO 80111

9

10

11

12

13

Betty J. Griffin

14

15

16

17

18

19

20

21

22

23

24

25

26

CLLI CODE	VENDOR MEET DATE	COMMENTS
PHNXAZSY	1/31/2001	Unable to recertify as Qwest did not show up for vendor meet
CHNDAZWE	1/30/2001	Unable to recertify as Qwest did not show up for vendor meet
CHNDAZMA	1/30/2001	Unable to recertify as Qwest did not show up for vendor meet
PHNXAZNW	1/29/2001	Unable to recertify as Qwest did not show up for vendor meet. Spots frame mislabeled: for example CP 101 is received as 201
DNVRCOCP	2/1/2001	Unable to recertify as Qwest did not show up for vendor meet
STPLMNBE	1/30/2001	Unable to recertify as Qwest did not show up for vendor meet. 2 rows on Spots frame reversed
SCDLAZSH	1/4/2001	Unable to recertify as Qwest did not show up for vendor meet. Stencilling should be on ALT01 not ALT02. Cabling miswired as cable correct coming in but not out to customer.
MESAAZGI	1/31/2001	Unable to recertify as Qwest did not show up for vendor meet
PHNXAZEA	1/31/2001	Unable to recertify as Qwest did not show up for vendor meet. Stencilling incorrect as cables reversed at splitters
PHNXAZCA	1/29/2001	Unable to recertify as Qwest did not show up for vendor meet
MPLSMNTF	2/1/2001	Unable to tone out certain cables as the cables were bad.
DNVRCOCH	1/29/2001	Unable to recertify as Qwest did not show up for vendor meet
SCDLAZTH	1/29/2001	Unable to recertify as Qwest did not show up for vendor meet
LTTNCOHL	1/31/2001	Unable to recertify as Qwest did not show up for vendor meet
TEMPAZMA	1/29/2001	Unable to recertify as Qwest did not show up for vendor meet
PHNXAZGR	1/29/2001	Unable to recertify as Qwest did not show up for vendor meet
DNVRCOMA	1/31/2001	Unable to recertify as Qwest did not show up for vendor meet

EXHIBIT A