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BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
Chairman

JIM IRVIN
Commissioner

WILLIAM A. MUNDELL
Commissioner

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Arizona Corporation Commission

FEB 07 2000

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IN THE MATTER OF U S WEST)
COMMUNICATIONS, INC.'S)
COMPLIANCE WITH SECTION 271 OF THE) DOCKET NO. T-00000B-97-238
TELECOMMUNICATIONS ACT OF 1996)
_____)

MCI WORLDCOM'S INITIAL COMMENTS ADDRESSING THE MASTER TEST PLAN, VERSION 3.0, AND THE TEST STANDARDS DOCUMENTS

In accordance with the request of Cap Gemini Telecommunications, MCI WorldCom, Inc. ("MCIW") on behalf of its regulated subsidiaries submits its initial comments addressing the Master Test Plan, Version 3.0 and the Test Standards Document. These initial comments were electronically sent to the TAG members and others on February 4, 2000.

Generic Comments to the AZ MTP, draft version 3.0

General Concerns:

The actual AZ MTP.3 leaves too much room for interpretation. Although the level of topics covered is significant, the contents of those topics are too generic. The next iteration of the MTP should be more descriptive to leave little or no room for interpretation.

Although a number of the following comments may have been previously submitted, as they are not yet part of the MTP, MCIW would like to re-emphasize essential requirements to obtaining a comprehensive/objective third party test.

Administrative Comments:

It is very difficult to assess and manage two separate documents, namely the MTP.3 and the Test Standards Document. To have to cross-reference the two documents in order to evaluate and validate content is quite cumbersome and only increases the likelihood of inaccuracies.

Section 1, page 3, last paragraph. The sentence reads, “CLECs and USWC will conduct testing...” MCIW believes that the testing will be conducted by the Pseudo-CLEC.

Integrated Pre-Order and Order Functionality:

Functional testing of integrated pre-order and order must be added to the test. That is, the information obtained from the pre-order system is automatically populated, with no additional manipulation, onto the LSR in near real time. FCC orders have required proof of access to this functionality, which is imperative for full-scale commercial operation by competing local service providers.

Regression Testing:

Additional language must be added that specifically refers to what MCIW calls “regression” testing. That is, the third party should retest any fixes that are made by USWC to ensure both that the problem has been fixed and that no other problem has been created by the change.

LIDB Testing:

The following functions of LIDB transactions must be included in the AZ test: 1) Actual ordering of LIDB. In every state except Texas to date, LIDB treatment is ordered

on the LSR. The LEC then updates the LIDB record. 2) LIDB provides the option to block inbound collect and third party calls as well as PIC changes.

Testing Hours:

Language must be added to indicate that testing will be performed during normal business hours.

Billing:

The following language should be incorporated into the MTP. “Data contained in Daily Usage Feeds will be compared to call logs and Telco Bills”. As well, MCIW recommends language such as, “An audit of these bills will determine the validity of records and if discrepancies are determined, methods for reconciliation require auditing and reporting”.

UNE-Platform Testing not UNE-C:

The MTP must specify a full production line of UNE-Platform that will be tested. Testing scenarios for UNE-Platform should include the following: new, disconnect, conversion “as is”, conversion “as specified” and conversion with “directory listing change(s) (DL)”. Current scenarios for UNE-C allow for the ability to change/add features and DL. Does this mean that the conversion with changes will occur at the same time or does it mean the conversion will require one order, followed by a supplemental order to process the change(s)?

USWC has recently agreed that the performance measurements will measure all types of UNE-Platform. Therefore, the types of UNE-P to be measured must be clarified. This is particularly of concern because it is not clear whether USWC’s definition of UNE-P is the same as that requested by CLECs.

Data Collection:

There must be a defined process for data collection, verifying what data collection is to be provided by USWC, CLECs and the Pseudo-CLEC.

EDI Pre-Order Functionality:

The version of EDI to be tested must be defined as well as the standards that will be used. EDI pre-order and parsed CSR functionality must be included. If the CSR information is not parsed, the likelihood of errors increases dramatically.

Maintenance and Repair:

The GUI/IMA must be tested for M&R functionality.

A parity test be performed to distinguish the length of time it takes a CLEC to process an electronic trouble ticket vs. the length of time it takes USWC. That would be the length of time it takes the order downloads to process to USWC back end systems.

The “Mechanized Loop Test” (MLT) must be verified. For example, did the MLT result provide the CLEC the proper information to open a trouble ticket?

The USWC M&R help desk must be tested a variety of days with varied hours of operation tested.

Unplanned Troubles:

Any recognized “unplanned troubles” that occur during the testing phase must automatically become part of the testing/evaluation process and are not required to follow the rules of section 2.2.3 “Additional Tests”.

Performance Measurements Comments to the AZ MTP, draft version 3.0

Executive Overview – bottom of page 1:

The document states that “The overall purpose of the collaborative test process ... is to demonstrate ...the extent of operational readiness, performance, and capability of USWC to provide CLECs with access to OSS for “*pre-ordering, ordering, provisioning, repair and maintenance, and billing*”. All of these functions must be tested. The list does not include collocation, network performance, interface availability and database updates. There must be details as to how these additional areas are evaluated. For some OSS processes, results may be evaluated using production data reported on the appropriate performance measure, while for others, actual test scenarios may apply.

Executive Overview - Retail Parity Evaluation - page 2:

It is not clear to MCIW why this is identified as a separate aspect of the test, with its own activities. An evaluation of parity or of USWC compliance with pre-defined benchmarks cuts across the entire test. Moreover, MCIW reads this section as if the test is only concerned with the actual systems that CLECs and USWC use. This section also assumes there is inherent parity in the interfaces and systems that CLECs use compared to those used by USWC. For pre-order response time, for example, parties know that the OSS access that CLECs have is not identical to the access USWC retail representatives have and, therefore, it may not be able to be evaluated using a parity standard. MCIW recommends language to address such issues.

Executive Overview - Performance Measurement Evaluation - page 2:

The MTP states that “the assessment will include reviews of Performance Measurement data collection and analysis (including an evaluation of the processes and

procedures that USWC employs to collect data and calculate performance measurements), a performance evaluation over a three-month period specified by the ACC, Functionality and Capacity tests and PM verification.”

MCIW believes that the MTP may be mixing two activities that need to be performed separately and at different times. The test cannot both use the performance measurements to collect and evaluate test results and test the performance measurements themselves to ensure they are performing adequately. MCIW believes there are no systems controls with this type of approach. For example, what tool will the test administrator use to evaluate the performance measurements themselves? MCIW knows of no mention of an independent tool to evaluate them. Also, assuming the test administrator were determined a problem with one or more of the measures, it would invalidate that portion of the test, as the evaluation tool (the performance measure) would have to be fixed and re-certified and then the test results would be properly reported. MCIW is also concerned that the test generator or test administrator is being asked to add the assessment of the performance measurements to their already formidable scope of work. Based on MCIW's experience in California, MCIW strongly recommends the use of a professional accounting/consulting firm. In California, Price Waterhouse Coopers was retained to conduct an audit of Pacific Bell's performance measurements and underlying systems. Similarly, Deloitte Touche has been engaged to conduct an audit of GTE's performance measurements and systems. As Price Waterhouse Coopers has just completed its audit, MCIW would be pleased to make available to the Arizona Commission, and other parties, any information that it is permissible to share about the engagement, including the detailed scope of the audit. MCIW believes the type of audit

that is necessary should be completed before the actual testing is started. In this way, the performance measurement systems and calculations can be independently verified before they are used to evaluate the output from the test.

Executive Overview - last paragraph - page 3:

The MTP states that “USWC will also provide personnel to develop and execute cases on the retail side of the Retail Parity Test.” MCIW opposes this as it permits USWC to control an important part of the test and may violate blindness. MCIW recommends utilizing production data instead.

Section 2 Introduction - 2.1 Purpose - page 4

In mentioning that some capabilities do not have a retail analog, the MTP uses the example unbundled network elements. Since this remains an open topic for the TAG, MCIW suggests a more clear cut example. MCIW believes that there is general agreement that there is currently no identifiable retail analog for a FOC interval measure, and recommends using this instead.

Section 2 Introduction - 2.2 Overall Approach - page 5

With regard to the 14 state region testing. MCIW believes that this issue was closed and recommends the resolution be reflected.

Section 3 - Scope 3.3.2 - Retail Parity Evaluation - page 12

MCIW would like more details on what this aspect of the test involves and how it fits into the scope of the overall test. In addition, MCIW would like more clarification on what is meant by the words “reasonably equivalent”.

Section 3 - Scope 3.3.5 - Performance Measurement Evaluation - page 13

The first sentence states that the “Performance Measurements Evaluation is a statistically valid assessment of the performance measures...” MCIW questions whether it is really that the performance measurements evaluation is a statistically valid assessment of the test output *using* the performance measures. In addition, MCIW’s would like to again recommend the use of an outside auditor that would perform an in-depth evaluation of the performance measures due to the enormous undertaking of this area of the test.

Section 3, - Scope 3.4 - Product Types - page 13-14

MCIW requests more detailed descriptions of system generated “acknowledgement” and “firm order confirmation” (FOC) notifications. Specifically MCIW would like to know the difference between the two. At this time, there is no performance measurement that looks at “acknowledgement” notifications.

Section 4 - Functionality Test - 4.2.1 Pre-Order/Order/Provisioning Interfaces - page 16

MCIW recommends the title of this sub-section be changed from “interfaces” to “processes” per the definitions of pre-order/order and provisioning.

Section 4 - Functionality Test - 4.3.1 Pre-Ordering/Ordering - page 18

MCIW recommends the inclusion of “loop qualification” and “reject/failed inquiries” in the pre-ordering/ordering functionalities.

Section 4 - Functionality Test - 4.6 Functionality Test Participants - page 21 and

Section 4 - Functionality Test - 4.7.4.1 Test Analysis and Reporting - page 24

MCIW recommends the purpose and use of the “Root Cause Analyses of all issues” be defined and agreed to by all parties.

Section 4 - Functionality Test - 4.7.1 Test Planning - page 21

MCIW believes that in order to establish the appropriate test volumes, the statistical methodology for assessing the results of the test must be agreed to before this phase of the test can commence. Therefore, MCIW recommends the development of this statistical methodology be an entrance criteria for the test planning phase.

Section 4 - Functionality Test - 4.7.3.2 Test Execution Entrance Criteria - page 23

MCIW strongly recommends that the AZ MTP account for performance measures as an entrance criteria of the test. MCIW cannot stress enough, from experience, the need for explicit identification of performance measurements as an entrance criteria to the test execution. MCIW also requests that the “operational readiness” and the “verification that all requirements have been met” and for the required performance measurements to be included as a criteria in the Arizona MTP. MCIW experience with other ILECs proved that not only is the implementation of the performance measurements a significant undertaking, but also that the verification process is essential. This experience has shown that where the operational assessment (audit) has been done, deficiencies were identified within the performance measurements processes that required corrective action before the measures could be declared fully functional. In the overall development of the planning and execution of the OSS test, MCIW recommends consideration should be given for the

interval to validate the operational readiness of the performance measures and to correct any deficiencies.

Section 4 - Functionality Test - 4.8 Functionality Test Success Criteria - page 24-25

The MTP states that “Benchmarks for Performance Measures... will serve as criteria for success of Functionality Testing. Given that some of the criteria will be parity standards, MCIW recommends the word “benchmarks” be changed to “measurable standards” to reflect what is in the PID.

Section 5 - Retail Parity Evaluation - 5.2, Retail Parity Evaluation Scope - page 25

MCIW request that the criteria for the evaluation that will be made with respect to this part of the test be defined. This is especially necessary for the aspect of this evaluation that will look at “the experience which the customer has while on the line with a CLEC representative, in comparison to the experience of a customer while on the line with a USWC representative.”

Section 5 - Retail Parity Evaluation - 5.5, Retail Parity Evaluation Data - page 27

The statement that “Data must originate from both resale CLECs and from USWC retail” implies that all of this part of the test is focused solely on resale. MCIW strongly opposes this and asks that it be changed to reflect the CLEC marketplace.

Section 5 - Retail Parity Evaluation - 5.8, Retail Parity Evaluation Success Criteria - page 27

The statement that, “Do the OSS respond within substantially the same time frames” implies that this will be measured at parity, but MCIW believes that due to concerns about the use of EnView type process, it is still an open issue whether a parity comparison can be performed.

**Section 6 - Capacity Test Purpose - 6.3, Capacity Test Coverage and Scenarios -
page 29**

MCIW would like clarification for the use of a footnote with reference to Appointment Scheduling?

**Section 6 - Capacity Test Purpose, - 6.4, Capacity Test Coverage and Scenarios -
page 32**

MCIW recommends the MTP include the validated performance measures as an entrance criteria for the capacity test. As previously stated, MCIW strongly recommends that Performance measurements be explicitly identified as an entrance criteria to test execution.

**Section 8 - Performance Measurement Evaluation - 8.2 Performance Measurement
Evaluation Scope - page 37-38**

In describing the detailed description of USWC's performance measurements, MCIW recommends that the MTP list the "measurable standard" as one of the key items included on each page. The measurements in Appendix B include the "measurable standard".

**Section 8 - Performance Measurement Evaluation - 8.3 and 8.3.1 Performance
Measurement Evaluation Coverage and Scenarios - page 38**

Both sections reference processes and procedures "in place". MCIW requests clarification of what "in place" means.

Section 8 - Performance Measurement Evaluation - 8.3 Performance Measurement Evaluation Coverage and Scenarios - page 38

This section states that 3 months of data will be evaluated. If test data cannot be used, MCIW would like to emphasize how critical it is for USWC to implement the measures as soon as possible so that when it comes time to audit, production data can be utilized. As a reference, this activity in other states (e.g., California) took over two months to complete utilizing a staff of over fifteen full-time analysts. MCIW recommend that these activities be added to the project timeline.

Section 8 - Performance Measurement Evaluation - 8.4.1 Review of Data Collection Process - page 39

The MTP states that, “if appropriate, the Test Administrator will conduct interviews of USWC and/or CLEC personnel.” In the recent audit of Pacific Bell’s performance measurements, CLECs were informed that Price Waterhouse Coopers conducted hundreds of interviews and meetings with the Pacific Bell personnel who work on the performance measurements. In addition, the auditor reviewed all relevant procedures as well as evaluated numerous systems used in the reporting process, including source data systems. Therefore, MCIW simply requests that Cap Gemini take these types of processes into account.

Section 8 - Performance Measurement Evaluation, 8.4.2 Historical Data Evaluation, page 39

MCIW recommends that historical data be defined. MCIW does agree that recalculating three months of raw data can be called an evaluation of USWC’s performance measurements.

Section 8 - Performance Measurement Evaluation - 8.5 Performance Measurement Evaluation Entrance and Exit Criteria - page 40

MCIW recommends more that a review of USWC's documented processes and procedures. The audit should reveal that the procedures match the agreed to performance measurements, that the data collected is compliant with the definitions of each measure, (this includes a review of the underlying OSS from which the source data is gathered), and that any calculations performed are as described. Furthermore, MCIW recommends that section 8.5 reference what happens if there is material that is non-compliant in any one of these areas.

Section 10 - Proposed Schedule and Timeline

MCIW recommends this section be updated to reflect work planned and accomplished .

Appendices/Exhibits B and C

MCIW recommends the most versions be included. In addition, MCIW requests the inclusion of all critical path items, such as validation of the performance measurements be added to the schedule.

General Comments regarding Performance Measurements:

MCIW recommends the title of the PID be changed to "OSS Test PID - Arizona". The FCC's Order in the Bell Atlantic New York ("BANY") proceeding specifically references the need for an enforcement plan after receiving 271 authorization. (BANY Memorandum Opinion and Order; CC Docket No. 99-295; Released December 22, 1999; at ¶433) Specifically, the FCC identified five important characteristics of an enforcement plan based on performance measurements:

- potential liability that provides a meaningful and significant incentive to comply with the designated performance standards;
- clearly articulated, pre-determined measures and standards, which encompass a comprehensive range of carrier-to-carrier performance;
- a reasonable structure that is designed to detect and sanction poor performance when it occurs;
- a self-executing mechanism that does not leave the door open unreasonably to litigation and appeal;
- and reasonable assurances that the reported data is accurate.

MCIW Comments on specified sections in the AZ MTP, draft version 3.0:

Section 2.1 – Purpose – 1st bullet, second (-), MCIW would like the following clarified: What is the evaluation criteria for measuring the capabilities? Does “meaningful” opportunity mean parity?

Section 2.1 – Purpose - 2nd bullet, MCIW would like defined the entrance and exit criteria to be used to determine operational readiness. Is the "foreseeable demand" based on CLEC forecast?

Section 3.1.2 - Billing Architectures - MCIW recommends that since the ASR interface is being evaluated, the associated Carrier Access Billing System (CABS) bills ought to also be included in the list of billing interface files to be evaluated.

Section 4.2.1 - Pre-Order/Order/Provisioning Interfaces – MCIW would like defined what LSOG version will be tested.

Section 4.3 - Functionality Test Coverage and Scenarios – 2nd paragraph, MCIW requests that partial flow-through service orders be defined.

Section 4.3.1 - Pre-Ordering/Ordering - MCIW requests that the following pre-order processes be included in the functionality test: Service Order Status, Directory Listing and Installation Status.

Section 4.3.2 - Provisioning – Clarifying question regarding the reference to a FOC meaning Firm Order Commitment. MCIW believes this should be Firm Order Confirmation.

Section 4.5 - Functionality Test Data – 1st paragraph, last sentence. MCIW would like defined the criteria to be used to determine "enough accounts to ensure statistical sound." Will the CLEC's forecasts play any role in this determination?

Section 4.7.3 - Test Execution - MCIW recommends the addition of "exception reporting" which would promote the idea use of "Military Style Testing". That is, the Test Administrator would provide written documentation of problems uncovered in the test. In the event, "other issues" arise from the problem(s) uncovered, they too would be addressed to resolution with the consensus of all parties.

Section 4.9 - Functional Test Assumptions - last bullet. MCIW recommends the use of 3 billing cycles in order to accurately validate initial, prorates, disconnects, migrations, adjustments, etc.

Section 5.6 - Retail Parity Evaluation Participants – MCIW would like to know the reasoning behind excluding the Pseudo-CLEC from this test?

Section 6.7.3.3 - Test Execution - 1st Bullet, MCIW recommends language that would emphasis the test case(s) actual results would be expected results, i.e. Pass/Fail.

Appendix A- Test Scenarios: MCIW request the inclusion of following:

Standalone PreOrder:

Address validation
Telephone Number Inquiry
Customer Service Record (CSR) CRIS Inquiry
Due Date Availability
Directory Listing Inquiry*
Installation Status Inquiry*
Feature and Service Availability Inquiry
Loop Qualification Inquiry
Access Billing Customer Service Record (CSR) Inquiry*
Service order from SOP Inquiry*
*not shown in the PO-1 PM exhibit B

Resale:

CLEC to CLEC migration
Feature changes to existing customer
Migration from ILEC "as specified"
Telephone # change
Directory change
Moves (inside and out)
Change LPIC/PIC

UNE-L:

Migrate from CLEC to CLEC
Add new interoffice DS1/DS3 facilities
Partial Disconnect
Inside Move
Convert from UNE-C (UNE-P) to UNE-L
Convert from Resale to UNE-L
Add a new directory listing on existing account
Install new DID service
Changes to existing DID service
Migration of an account that has ILEC initiated Blocking
Migration of an account that has a pending ILEC service order
Migration of an account that has existing ILEC term/volume contract
Establish new CLEC end user account with request for Vanity telephone #.

UNE-C (UNE-P)

Migration from CLEC to CLEC
Add lines/trunks/circuits
Telephone # change
Inside move
Migrate from CLEC to ILEC
Convert line to ISDN
Convert line to xDSL
Add and Changes to DID service
Add new xDSL with shared line voice and data capability
Change PIC/LPIC

Questions/Changes to the Cap Gemini 271 Standards

Section 1.2 Test Approach refers to the TAG as the Technical Advisory Board.
Should be Technical Advisory Group.

Section 1.3 – Last paragraph “Pseudo-CLEC will enter data into the ILEC OSS.”
MCIW reads this to mean the “Pseudo-CLEC” will access directly into USWC’s systems.
MCIW recommends additional language that would reference what technology will be used to enable transactions to be submitted to USWC.

Section 1.4 – Second paragraph – List of information to be collected. MCIW recommends the collection of billing records.

Section 2 – “Friendlies” – MCIW requests language to support the difference between a "friendly" and an end user. In the third party test with PacBell, a "friendly" was defined as an address to hook up service to the network interface device. While an end user was defined as one who will make all of the usage calls.

Section 3.4 – Functionality Test Coverage and Scenarios – Second paragraph states “The Functional Test will include flow through, non-flow through, and manual orders.” The second sentence proceeds to describe flow through vs. non-flow through. MCIW recommends a definition for those orders that will be “manual”.

Section 3.7.2.2 – Scope, 4th bullet refers to SOC as a service order completion and in section 6.3 – 3rd paragraph SOC is referred to as service order constructor. MCIW would like to verify, first off, that they are one in the same and, secondly, that a SOC is the same as a completion notice.

Section 8.2.2.2 – Functionality Test Evaluation – Parity Measurements – Please define the term “Stare and Compare”.

Attachment A – Glossary – What acronym standards/dictionary/LSOG/LSOR, etc was/were used? Please provide definitions for the following acronyms: ETE, CT, FT, RESL, RSRP, RTRP, LPWP (Is this Port service?) and any other missing definitions.

MCIW recommends the following updates/corrections on certain acronyms:

CPE = Customer(provided) or (premise) equipment

FOC = Response prepared by the provider that provides the customer with information regarding critical dates, circuit information, order #s, etc.

LNPL = Local Number Porting with Loop

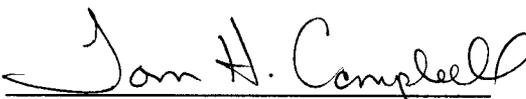
LQ = Loop Qualification

LSOG = Local Service Order Guidelines

RPONS = Related Purchase Order Numbers

Dated: February 7, 2000

LEWIS & ROCA LLP

By: 

Thomas H. Campbell
40 N. Central Avenue
Phoenix, Arizona 85004
602-262-5723

- AND -

Thomas F. Dixon
707 -17th Street, #3900
Denver, Colorado 80202
303-390-6206

Attorneys for MCI WorldCom, Inc.

ORIGINAL and ten (10)
copies of the foregoing filed
this 7th day of February, 2000,
with:

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

COPY of the foregoing hand-
delivered this 7th day of February, 2000,
to:

Deborah Scott, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Lyn Farmer, Chief Counsel
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Maureen A. Scott
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing mailed
this ~~7th~~ day of February, 2000, to:

Pat van Midde
AT&T Communications of the Mountain States
2800 N. Central Avenue
Phoenix, Arizona 85004

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

Mark Dioguardi
Tiffany and Bosco PA
500 Dial Tower
1850 N. Central Avenue
Phoenix, Arizona 85004

Thomas L. Mumaw
Snell & Wilmer
One Arizona Center
Phoenix, Arizona 85004-0001

Andrew O. Isar
TRI
4312 92nd Avenue N.W.
Gig Harbor, Washington 98335

Michael Patten
Brown & Bain, P.A.
2901 N. Central Avenue

Phoenix, Arizona 85012

Steven H. Kukta
Darren S. Weingard
Sprint Communications Co., L.P.
8140 Ward Parkway 5-E
Kansas City, Missouri 64114

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

Andrew D. Crain
Thomas M. Dethlef
Charles Steese
US West, Inc.
1801 California Street, Ste. 5100
Denver, Colorado 80202

Richard S. Wolters
Maria Arias-Chapleau
AT&T Law Department
1875 Lawrence Street, #1575
Denver, CO 80202

David Kaufman
e-spire Communications, Inc.
466 W. San Francisco Street
Santa Fe, NM 87501

Philip A. Doherty
545 South Prospect Street
Suite 22
Burlington, VT 05401

W. Hagood Bellinger
5312 Trowbridge Drive
Dunwoody, GA 30338

Craig Marks
Citizens Utilities Company
2901 N. Central Avenue
Suite 1660
Phoenix, AZ 85012

Douglas Hsiao
Rhythms Links, Inc.
6933 S. Revere Parkway
Englewood, CO 80112

Jim Scheltema
Blumenfeld & Cohen
1625 Massachusetts Avenue N.W.
Suite 300
Washington, DC 20036

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

Michael M. Grant
Gallagher & Kennedy
2600 N. Central Avenue
Phoenix, Arizona 85004-3020

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

Carrington Phillip
Cox Communications, Inc.
1400 Lake Hearn Drive, N.E.
Atlanta, Georgia 30319

Penny Bewick
Electric Lightwave, Inc.
4400 NE 77th Avenue
Vancouver, Washington 98662

Raymond S. Heyman
Randall H. Warner
Roshka Heyman & DeWulf
Two Arizona Center
400 Fifth Street
Suite 1000
Phoenix, Arizona 85004

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

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

Richard Smith
Cox California Telecom, Inc.
Two Jack London Square
Oakland, California 94697

Bill Haas
Richard Lipman
McLeod USA
6400 C Street S.W.
Cedar Rapids, Iowa 54206-3177

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

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

Alaine Miller
NextLink Communications, Inc.
500 108th Avenue NE
Suite 2200
Bellevue, Washington 98004

Handwritten signature of Betty J. Griffin in cursive script, underlined.