



0000011437

RECEIVED

200 APR 18 A 8:01

TELECOMMUNICATIONS COMMISSION  
BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK  
Chairman

JIM IRVIN  
Commissioner

WILLIAM A. MUNDELL  
Commissioner

Arizona Corporation Commission  
**DOCKETED**

APR 18 2000

DOCKETED BY 

IN THE MATTER OF US WEST  
COMMUNICATIONS, INC.'S  
COMPLIANCE WITH SECTION 271  
OF THE TELECOMMUNICATIONS  
ACT OF 1996 )  
)  
)  
)  
)  
)

Docket No: T-00000A-97-0238

**MCI WORLDCOM'S COMMENTS ADDRESSING THE MASTER TEST PLAN**

MCI WorldCom, Inc. ("MWCCom") submits these comments to the final Arizona Master Test Plan ("MTP") docketed on April 7, 2000. MWCCom has several items it will address in these comments.

**UNE-P (Unbundled Network Elements – Platform)**

Definition of UNE-P. The MTP contains a discrepancy in the definition of UNE-P. In Appendix (Exhibit) B, entitled U S WEST Performance Indicators, to the MTP on page 61 under Definition of Terms, the definition of UNE-P means: "Combinations of network elements, including both new and conversions." In Appendix E, entitled Glossary/Terminology, UNE-P means: "Unbundled network element combination (UNE-P is a conversion of the customers service to the CLEC at the unbundled network element rate)." The definition found in

1 Appendix E should be replaced with the definition found in Appendix B so that the two  
2 definitions are consistent.

3 UNE-P Test scenarios. The MTP must specify a full production line of UNE-P that will be  
4 tested. Testing scenarios for UNE-P should include the following: new, disconnect, conversion  
5 “as is”, conversion “as specified” and conversion with “directory listing change(s) (DL).” U S  
6 WEST Communications, Inc. (“U S WEST”) has recently agreed that the performance  
7 measurements will measure all types of UNE-P. Therefore, there must be a performance measure  
8 for UNE-P new. UNE-P “new” includes the ability to order UNE-P where pre-existing facilities  
9 do not exist for a customer.  
10

11 MWCom has been led to believe by U S WEST and the Pseudo-CLEC from its most  
12 recent task status report that the Pseudo-CLEC’s interconnection agreement was amended on or  
13 about April 3, 2000, to include the ability to order UNE-P “new” where pre-existing facilities do  
14 not exist for a customer. Test Scenarios for UNE-P “new” were not included in the MTP because  
15 it was previously asserted by U S WEST that UNE-P “new” was unavailable. Because U S  
16 WEST has begun offering UNE-P “new” to the pseudo-CLEC since on or about April 3, 2000, the  
17 MTP should include a Test Scenario for UNE-P “new.”  
18

19 **Subsection 3.3.2: Retail Parity Evaluation**

20 MWCom has found what appears to be a mistake in the first paragraph of  
21 subsection 3.3.2. The first sentence states: “The Retail Parity Evaluation will compare the U S  
22 WEST graphical user interface provided to CLECs for processing pre-order inquiries, LSRs and  
23 repair requests to the U S WEST internal retail graphical user interface utilized by U S WEST  
24  
25  
26

1 service order representatives.” Subsection 3.3.2 is a part of the “Overview of Test Types.” This  
2 first sentence may suggest that only the GUI interfaces are being evaluated for parity.

3 On page 2 of the MTP in the Executive Overview, the Retail Parity Evaluation is  
4 described as follows: “The Retail Parity Evaluation (PE) test is designed to directly evaluate  
5 parity of the U S WEST OSS. The test is a comparison of the ability of a CLEC representative  
6 using one of U S WEST’s OSS interfaces to provide an overall comparable level of service and  
7 experience to the level or service and experience that a U S WEST representative can provide  
8 using U S WEST’s standard internal OSS interfaces.” On page 30 of the MTP, the Retail Parity  
9 Evaluation is discussed in detail and amplifies the statements made in the Executive Summary.  
10

11 The first sentence of subsection 3.3.2 should be modified to read: “The Retail Parity  
12 Evaluation will compare the U S WEST graphical user interface provided to CLECs for  
13 processing pre-order inquiries, LSRs and repair requests to the U S WEST internal retail graphical  
14 user interface utilized by U S WEST service order representatives.” “The Retail Parity Evaluation  
15 will compare the U S WEST OSS interfaces provided to CLECs for processing pre-order  
16 inquiries, LSRs and repair requests to the U S WEST internal retail OSS interfaces utilized by U S  
17 WEST service order representatives.”  
18

19 In addition there appears to be a mistake in the second sentence. That sentence begins:  
20 “Specifically, the purpose of this test is to determine whether a CLEC representative, using a U S  
21 WEST OSS interface, and provide . . .” MWCom believes that the sentence should read:  
22 “Specifically, the purpose of this test is to determine whether a CLEC representative, using a U S  
23 WEST OSS interface, **can** provide . . .”  
24  
25  
26



1 stated that the primary objective of the OSS testing is to ensure that CLECs are able to  
2 effectively compete in the local market. Migration of customers back from one co-  
3 provider to another is a critical aspect of the ability to effectively compete in the local  
4 market. MWCom has had personal experience in the migration back of test “friendlies.”  
5 This migration process should be included and evaluated as part of the overall scope of the  
6 test. In late 1997, MWCom performed an EDI test of the U S WEST’s resale service at  
7 the request of the Colorado Public Utilities Commission. In January 1998, MWCom began  
8 the migration back and/or disconnects of the operational test trial resale customers. Many  
9 of these customers were from Arizona. During the past two years, MWCom has  
10 experienced significant problems with U S WEST’s migration process and the associated  
11 billing.  
12  
13

14 **Impact of Activities at the TAG Meeting held April 13, 2000**

15 Performance Measurement Program Audit. On April 13, 2000, a TAG meeting was held.  
16 At that TAG meeting several issues were addressed that impact the MTP. The first issue related  
17 to the performance measurement audit/review and was discussed by DCI. DCI issued a  
18 memorandum that addresses the issue. MWCom concurs with DCI’s recommendation to “adopt  
19 the GAO definition of Program Audit, and conduct the Performance Measurement Review in  
20 accordance with the GAO Government Auditing Standards, retitling it a “Performance  
21 Measurement Program Audit” that is contained in that memorandum.  
22  
23  
24  
25  
26

1 MWCom recommends that the DCI memorandum, dated April 11, 2000, and distributed  
2 to the TAG members on April 13, 2000, be attached as an Appendix to the MTP, presumably  
3 Appendix G.

4 Modifications to Appendix B. At the TAG meeting, Appendix B, entitled U S WEST  
5 Performance Indicators, was modified by agreement. Specifically the Test Standards for PO-1  
6 and OP-8 were established. For PO-1, the test standard was set at various benchmarks, based  
7 upon U S WEST's retail performance determined by U S WEST's IRTM. For OP-8, the test  
8 standard was established at 95%. Staff has agreed to update Appendix B accordingly. MWCom  
9 agrees with these negotiated test standards for these two performance indicators.  
10

11 Dated: April 17, 2000.

12 LEWIS AND ROCA LLP

13  
14 

15 Thomas H. Campbell  
16 40 N. Central Avenue  
17 Phoenix, Arizona 85007

18 - AND -

19 Thomas F. Dixon  
20 MCI WorldCom, Inc.  
21 707 -17<sup>th</sup> Street, #3900  
22 Denver, Colorado 80202  
23 303-390-6206  
24 Attorneys for MCI WorldCom, Inc.

22 ORIGINAL and ten (10) copies  
23 of the foregoing filed this 17<sup>th</sup>  
24 day of April, 2000 with:

25 Arizona Corporation Commission  
26 Utilities Division - Docket Control  
1200 W. Washington Street  
Phoenix, Arizona 85007

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

COPY of the foregoing hand-delivered this 17<sup>th</sup> day of April, 2000, to:

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

Lyn Farmer, Chief Hearing Officer  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, Arizona 85007

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

COPY of the foregoing mailed This 17<sup>th</sup> day of April, 2000, to:

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

**LEWIS**  
AND  
**ROCA**  
LLP  
LAWYERS

- 1 Andrew O. Isar  
TRI  
2 4312 92<sup>nd</sup> Avenue N.W.  
Gig Harbor, Washington 98335
- 3 Michael Patten  
4 Brown & Bain, P.A.  
2901 N. Central Avenue  
5 Phoenix, Arizona 85012
- 6 Timothy Berg  
Fennemore, Craig, P.C.  
7 3003 N. Central Avenue  
Suite 2600  
8 Phoenix, Arizona 85012-3913
- 9 Thomas M. Dethlef  
Andrew D. Crain  
10 Charles Steese  
US West, Inc.  
11 1801 California Street, Ste. 5100  
Denver, Colorado 80202
- 12 Joan S. Burke  
13 Osborn & Maledon  
2929 N. Central Avenue  
14 21<sup>st</sup> Floor  
Phoenix, Arizona 85067-6379
- 15 Michael M. Grant  
16 Gallagher & Kennedy  
2600 N. Central Avenue  
17 Phoenix, Arizona 85004-3020
- 18 Richard M. Rindler  
Morton J. Posner  
19 Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
20 Washington, D.C. 20007-5116
- 21 Carrington Phillip  
Cox Communications, Inc.  
22 1400 Lake Hearn Drive, N.E.  
Atlanta, Georgia 30319
- 23 Penny Bewick  
24 Electric Lightwave, Inc.  
4400 NE 77<sup>th</sup> Avenue  
25 Vancouver, Washington 98662
- 26

- 1 Raymond S. Heyman
- 2 Randall H. Warner
- 3 Roshka Heyman & DeWulf
- 4 Two Arizona Center
- 5 400 Fifth Street
- 6 Suite 1000
- 7 Phoenix, Arizona 85004
  
- 8 Diane Bacon, Legislative Director
- 9 Communications Workers of America
- 10 5818 North 7<sup>th</sup> Street
- 11 Suite 206
- 12 Phoenix, Arizona 85014-5811
  
- 13 Charles Kallenback
- 14 ACSI
- 15 131 National Business Parkway
- 16 Annapolis Junction, Maryland 20701
  
- 17 Richard Smith
- 18 Cox California Telecom, Inc.
- 19 Two Jack London Square
- 20 Oakland, California 94697
  
- 21 Bill Haas
- 22 Richard Lipman
- 23 McLeod USA
- 24 6400 C Street S.W.
- 25 Cedar Rapids, Iowa 54206-3177
  
- 26 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.
- 500 108<sup>th</sup> Avenue NE
- Suite 2200
- Bellevue, Washington 98004

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

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

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

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

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

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

W. Hagood Bellinger  
5312 Trowbridge Drive  
Dunwoody, GA 30338

*Betty J. Griffin*