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Arizona Corporation Commission

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BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK  
Chairman  
JAMES M. IRVIN  
Commissioner  
WILLIAM A. MUNDELL  
Commissioner

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DOCKETED BY [Signature]

ARIZONA CORPORATION COMMISSION  
STAFF CONTROL

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  
AT&T'S AND TCG PHOENIX'  
COMMENTS ON THE MASTER  
TEST PLAN

AT&T Communication of the Mountain States, Inc. and TCG Phoenix  
(collectively "AT&T") file the following comments on the Master Test Plan, version 4.0  
("MTP"), docketed by the Staff of the Arizona Corporation Commission ("ACC") April  
6, 2000.

**I. ISSUES AND CONCERNS WITH ARIZONA MASTER TEST PLAN  
VERSION 4.0**

**A. Billing Architecture -- UNE-P**

MTP Section 3.1.2 and the accompanying diagram "Exhibit II Billing  
Architecture" make no provision for, or mention of, the processes that U S WEST  
Communications, Inc. ("U S WEST") employs to provide usage records to competitive  
local exchange carriers ("CLECs") for their billing of access charges to interexchange  
carriers. U S WEST committed to provide clear descriptions of the processes it uses to  
identify the call detail records which reflect calls terminating at lines that are UNE-  
Platform arrangements. Such calls would serve as the basis for the CLEC serving that  
UNE-P line to bill the interexchange carrier for terminating access. CLECs asked

U S WEST to provide the detailed descriptions of the processes and to supply a modified Exhibit II or another diagram that depicts the processes and functions within the U S WEST system architecture that supports the billing arrangement.

Without these process descriptions and/or drawings, CLECs are unaware of the manner in which U S WEST actually provides these call detail records and the Test Administrator is unaware of the system configurations that should be tested to ensure that the processes function to their designed capability.

AT&T cannot submit the text or drawings that should be contained within this Master Test Plan as these can only be developed on the basis of knowledge and familiarity with the specific U S WEST computer processing and operations systems. The paragraphs that should have been modified or supplemented by U S WEST prior to submitting the Master Test Plan to the ACC are:

### **3.1.2 Billing Architectures**

#### **CRIS Architecture**

For the billing interfaces, the diagram provided on Exhibit II describes the components that produce usage and monthly bill information. When an end-user customer's account is resold to a CLEC, the resulting service order updates the account to reflect that change. As the end-user customer generates toll usage, it is sent from the AMA system into the CRIS billing system, where it is associated with the CLEC's account. The toll usage is then forwarded to the CLEC in a daily usage feed file. U S WEST produces a billing summary file with all recurring and non-recurring charges and sends it to the CLEC on a monthly basis.

#### **IABS Architecture**

For the trunk-side unbundled network elements (UNEs) and interconnection services, the architectural diagram shown on Exhibit II is a high level description of IABS. There are three usage feeds to the usage-processing module. Another entry point is the Access Service Request (ASR) submitted by the customer service representative. These ASRs go to the service order-processing module. Both usage and service

orders are sent to the account management module to associate the usage and service order detail to accounts.

**B. Capacity Test -- Non Flow-Through Orders**

In MTP Section 6.8, an incorrect Success criterion has been established for the Capacity Test. There was no agreement reached among the parties that the “Non flow-through orders will not be processed” criterion should be added to the means by which success in the Capacity Test will be measured.

The discussions that surrounded the issue of the types of local service orders that would be processed in the Capacity Test eventually concluded that the Capacity Test would involve electronically submitted (*i.e.*, EDI) orders, and that if the electronic orders were to be processed manually, the U S WEST manual processing of those would not be evaluated, because to do so would ultimately be a test of U S WEST’s ability to quickly hire staff to process the orders and then terminate the staff employees at the end of the test. The Capacity Test is not to be a test of U S WEST’s abilities to hire and fire employees, but to evaluate whether its systems have the capacity to process the pre-order and order transactions in accordance with the performance metrics attached to that processing.

The inclusion of a success criterion that would limit the types of orders that are to be processed in the Capacity Test is, perhaps, a placement error, but it is a limitation that is otherwise inconsistent with the description of the Capacity Test and the types of electronic pre-order and order transactions that are to be tested.

**6.8 Capacity Test Success Criteria**

- The relevant performance measures standards met
- All tested U S WEST OSS handled the offered load
- The Capacity Test execution did not cause application or system failures

- Non flow-through orders will not be processed [this criterion is to be deleted]

### **C. Interface Development Evaluations**

In the part of Section 7.2 that deals with Interface Development, AT&T had asked, and understood, that CGT and U S WEST agreed that the evaluation consider the development of all OSS interfaces. The MTP now states that the evaluation is limited to just the pre-ordering and ordering electronic interfaces and the IMA-GUI interface, from the perspective of the documentation, specifications and consultative assistance provided by U S WEST. These are the key evaluation areas for all interfaces, and each of the U S WEST interfaces should be subjected to the same type of Interface Development evaluations.

Limiting the evaluations to the interfaces named in this Section ignores the other interfaces that are used by CLECs in their interconnection with U S WEST, namely the electronic maintenance and repair interface, EB-TA, and the electronic interfaces used by U S WEST to provide wholesale billing data to CLECs. The abilities of CLECs to effectively use these interfaces is to be evaluated to the same extent as the interfaces identified in this section.

The Interface Development paragraph in Section 7.2 should read:

“This evaluation will examine the documentation, specification and consultative assistance provided by U S WEST to CLECs for use in building electronic interfaces or installing IMA. This test will also include an evaluation of the test environment U S WEST provides CLECs for pre-testing their EDI interfaces.”

The related revisions to Section 7.2.4 in this same regard should read:

#### **7.2.4 Interface Development Evaluation**

The Interface Development Evaluation is an evaluation of the U S WEST Interface Development and Implementation Documentation for electronic interfaces and IMA GUI installation. The Test Administrator will perform

this evaluation with involvement by U S WEST, the CLECs, and the Pseudo-CLEC.

The Interface Development Evaluation will involve the following activities:

- a) Gather documentation
- b) Review and evaluate documentation
- c) Monitor and evaluate U S WEST's processes and procedures supporting CLEC electronic interface development (EDI,EB-TA and billing) and implementation (EDI,EB-TA, billing, and IMA) efforts
- d) Attend U S WEST/CLEC or U S WEST/Pseudo-CLEC interface technical meetings
- e) Document observations
- f) Determine whether U S WEST provides CLECs adequate access to testing facilities that enable CLECs to implement the electronic interfaces

#### **Gather Documentation**

The U S WEST EDI Interface Process and EDI development related documentation will be retrieved from their web site or provided by U S WEST. Additionally, the IMA Implementation Process and associated implementation documentation will also be retrieved. The documentation necessary for development of the EB-TA and billing interfaces will also be obtained. The Test Administrator will perform the gathering of the documentation through network access and through contacts with U S WEST.

#### **Review and Evaluate Documentation**

The U S WEST Interface Development Process documentation will be reviewed and evaluated by the Pseudo-CLEC and Test Administrator. The observations of the Pseudo CLEC will be documented and will be included in the Relationship Management summary report. The focus will be on the clarity, completeness and sufficiency of the information U S WEST makes available to CLECs for developing electronic interfaces and installing the IMA OSS interfaces.

#### **Monitor and Evaluate U S WEST's Processes Supporting CLEC Interface Development**

The monitoring process will be conducted at U S WEST facilities, CLEC facilities, and Pseudo-CLEC facilities. The Test Administrator will observe the processes for design and development of the electronic interfaces and the processes for

design, development testing and implementing an IMA GUI Interface to the U S WEST OSS. The Test Administrator will conduct interviews with U S WEST, the Pseudo-CLEC, and CLEC personnel. This will be a cooperative process to identify, discuss, and track OSS interface development and implementation activities in progress. The monitoring evaluation will attempt to answer the following questions:

- a) Are U S WEST processes, timing and communications governing the development of electronic interfaces to U S WEST's OSS or implementing a U S WEST IMA GUI interface carried out in accordance with the U S WEST processes and procedures published and available to the CLECs?
- b) Are the terms and definitions utilized in the electronic interface development and IMA GUI implementation documentation published and available to the CLECs?
- c) Can the CLECs and the Pseudo-CLEC obtain documentation relating to building an interface and/or configuring service to the U S WEST EDI, EB-TA, billing and IMA GUI interfaces? Is the documentation clear, accurate, and sufficient to build the interface?
- d) Are meetings to discuss interface development reasonably scheduled and attended by U S WEST subject matter experts?
- e) Does U S WEST provide CLECs with adequate access to testing facilities that enable CLECs to implement an electronic interface?

#### **Attend EDI Interface Development Meetings**

With U S WEST and CLEC or Pseudo-CLEC permission, the Test Administrator will attend EDI Interface Development meetings to gather information and evaluate U S WEST's relationship with the parties involved in the CLEC EDI Development process.

#### **Document Observations**

All observations will be documented and reported in the Relationship Management summary report.

#### **7.2.4.1 Entrance Criteria**

- a) U S WEST's documented Development processes and Technical Documentation for electronic interface development and IMA Installation/Configuration
- b) Evaluation criteria and checklists
- c) Interview Questionnaire

#### **7.2.4.2 Exit Criteria**

- a) Completed checklists and questionnaires
- b) Documentation on results of evaluations and observations
- c) Summary report

### **D. Change Management Process Evaluation**

Section 7.2.5 Change Management Process Evaluation is to provide an assessment of how U S WEST's process functions, and it should include a review of U S WEST's ability to implement at least one significant software release. The "significant software release" aspect of this evaluation was discussed in the Arizona TAG meetings and agreed by the parties to be an appropriate inclusion within the Change Management Process Evaluation.

U S WEST is currently in the throes of implementing a significant software release (migration from Release 4.2 to Release 5.0), and the opportunity should be taken to observe this critical aspect of the U S WEST Change Management Process. The FCC's Common Carrier Bureau penned this requirement in its September, 1999 letter to U S WEST advising of various measures that it recommended be included in the Third-Party OSS Test.

The following paragraphs are needed in this section:

#### **Monitor and Evaluate**

The Test Administrator will monitor the execution of the Change Management procedures based upon the observation criteria. The purpose of this process is to ensure that U S WEST is adhering to the methods and procedures it has established. It is imperative that the

CLECs be provided with advance notice to system changes and enhancements and a test environment to test system changes prior to implementation. Without proper lead-time and a test environment the CLECs will not be prepared to meet the user requirements of the changes or enhancements.

The monitoring process will be conducted at U S WEST facilities, CLEC facilities, Pseudo-CLEC facilities and through the CICMP monthly meetings held by U S WEST. The Test Administrator will observe the process in action by U S WEST, will conduct interviews with U S WEST and CLEC personnel, and attend monthly U S WEST CICMP meetings. This will be a cooperative process to identify, discuss, and track OSS interface new functionality, enhancements to existing software, and required code maintenance. The monitoring evaluation will evaluate U S WEST's execution of their published Change Management Processes for OSS systems used by the CLECs and will include a review of U S WEST's ability to implement at least one significant software release.

DATED this 17<sup>th</sup> day of April, 2000.

Respectfully submitted,

AT&T COMMUNICATIONS OF  
THE MOUNTAIN STATES, INC.  
AND TCG PHOENIX.

By:   
Thomas C. Pelto  
Richard S. Wolters  
AT&T Law Department  
1875 Lawrence Street, 14<sup>th</sup> Fl.  
Denver, Colorado 80202  
Telephone: (303) 298-6741  
Facsimile: (303) 298-6301

OSBORN MALEDON, P.A.  
Joan S. Burke  
2929 N. Central, Suite 2100  
Phoenix, AZ 85012  
(602) 640-9356  
E-mail: [jsburke@omlaw.com](mailto:jsburke@omlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that the original and 10 copies of Comments of AT&T and TCG on Master Test Plan were filed this 17th day of April, 2000, with:

Arizona Corporation Commission  
Docket Control – Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

and that a copy of the foregoing was hand-delivered, this 17<sup>th</sup> day of April, 2000 to the following:

Timothy Berg  
Fennemore Craig, P.C.  
3003 North Central Ave., #2600  
Phoenix, AZ 85012

and that a copy of the foregoing was sent via United States Mail, postage prepaid, this 17th day of April, 2000 to the following:

David Motycka  
Arizona Corporation Commission  
Acting Assistant Director of Utilities  
1200 West Washington Street  
Phoenix, AZ 85007

Maureen Scott  
Legal Division  
Arizona Corporation Commission  
Director of Utilities  
1200 West Washington Street  
Phoenix, AZ 85007

Mark A. DiNunzio  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Thomas H. Campbell  
Lewis & Roca L.L.P.  
40 N. Central Avenue  
Phoenix, AZ 85004

Jeffrey W. Crockett  
SNELL & WILMER  
One Arizona Center  
Phoenix, AZ 85004-0001

Michael M. Grant, Esq.  
Gallagher and Kennedy  
2875 E. Camelback Road  
Phoenix, AZ 85016

Thomas M. Dethlefs, Esq.  
U S WEST Communications, Inc.  
1801 California Street, #5100  
Denver, CO 80202

Michael W. Patten  
Brown & Bain, P.A.  
P. O. Box 400  
2901 North Central Ave.  
Phoenix, AZ 85001-0400

Thomas F. Dixon  
MCI Telecommunications Corporation  
707 – 17<sup>th</sup> Street, #3900  
Denver, CO 80202

Scott Wakefield  
Stephen Gibelli  
Residential Utility Consumer Office  
2828 North Central Ave., #1200  
Phoenix, AZ 85004

Daniel Waggoner  
Davis Wright Tremaine  
2600 Century Square  
1502 Fourth Avenue  
Seattle, WA 98101-1688

Karen Johnson  
Penny Bewick  
Electric Lightwave, Inc.  
4400 NE 77<sup>th</sup> Ave  
Vancouver, WA 98662

Charles Kallenbach  
American Communications Services, Inc.  
131 National Business Parkway  
Annapolis Junction, MD 20701

Mark Dioguardi, Esq.  
Tiffany and Bosco, P.A.  
500 Dial Tower  
1850 North Central Ave.  
Phoenix, AZ 85004

Joyce Hundley  
United States Dept. of Justice  
Antitrust Division  
1401 H Street NW, Suite 8000  
Washington, DC 20530

Carrington Phillip  
Fox Communications, Inc.  
1400 Lake Hearn Drive, N.E.  
Atlanta, GA 30319

Darren S. Weingard  
Stephen H. Kukta  
Sprint Communications Company L.P.  
1850 Gateway Drive, 7<sup>th</sup> Floor  
San Mateo, CA 94404-2467

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

Bill Haas  
Richard Lipman  
McLeod USA  
6400 C Street SW  
Cedar Rapids, IA 54206-3177

Richard Smith  
Director of Regulatory Affairs  
Cox Communications  
2200 Powell Street, Suite 795  
Emeryville, CA 94608

Kathy Thomas  
Brooks Fiber Communications  
1600 South Amphlett Blvd., #330  
San Mateo, CA 94402

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

Alaine Miller  
NEXTLINK Communications, Inc.  
500 108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004

Thomas L. Mumaw, Esq.  
Jeffrey W. Crockett, Esq.  
Snell & Wilmer L.L.P.  
One Arizona Center  
Phoenix, AZ 85004-0001

Robert Munoz  
WorldCom, Inc.  
225 Bush Street, Suite 1900  
San Francisco, CA 94014

Diane Bacon, Legislative Director  
Communications Workers of America  
Arizona State Council  
District 7 AFL-CIO, CLC  
5818 N. 7th Street, Suite 206  
Phoenix, AZ 85014-5811

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

Colin Alberts  
Blumenfeld & Cohen  
1625 Massachusetts Ave. N.W.  
Suite 300  
Washington, DC 20036

  
\_\_\_\_\_  
338308