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BEFORE THE ARIZONA CORPORATION COMM.

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AZ CORP COMMISSION

CARL J. KUNASEK
Chairman

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JIM IRVIN
Commissioner

DOCUMENT CONTROL Arizona Corporation Commission

WILLIAM A. MUNDELL
Commissioner

2000
FEB 08 2000

**IN THE MATTER OF U S WEST)
COMMUNICATIONS, INC.'S)
COMPLIANCE WITH § 271 OF THE)
TELECOMMUNICATIONS ACT)
OF 1996)
)**

DOCKET NO. T-00000B-97-238

**RESPONSE OF MCI WORLDCOM TO US WEST'S COMMENTS
RE OPENESS OF PROCESS TO US WEST**

On January 25, 2000, the Arizona Corporation Commission Staff issued a Report on various process issues raised by the CLECs concerning the OSS test. In the Report, Commission Staff acknowledges that "in an effort to preserve blindness and insure test integrity, [it has] withheld information regarding certain test objectives and the project schedule from U S WEST." *Report at 10.* U S WEST objected to the level of information being withheld from it and, as a result, the Commission Staff gave U S WEST until February 4, 2000 to "present information from other states relating to the type and amount of information disseminated to the BOC as part of the OSS testing process." On February 4, 2000, U S WEST filed its comments in response to

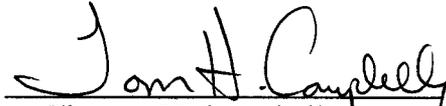
Staff's inquiry. MCI WorldCom, Inc. ("MCIW") files this response to U S WEST' s comments.

1. The purpose of blindness is to ensure that the treatment that the tester gets is equivalent to what a CLEC gets. There are a lot of "beginner" CLECs out there that would presumably make the same kind of errors Cap Gemini Telecommunications ("CGT") is making. The test is to show that the documentation and processes and account team support are sufficient to help those CLECs.
2. Allowing U S WEST to "fix " CGT's problems would be like allowing U S WEST to fix coding errors or misinterpretations caused by MCIW's developers without those developers asking for help.
3. The Georgia Bell South test is not a good comparison. The CLECs, including MCIW, have challenged the loss of blindness in the process. MCIW has chosen not to participate in the Georgia test due to the problems with lack of openness. As that test moves forward, with changes to the test plan as a result of CLEC and DOJ and presumably FCC concerns, openness is increasing. CLECs are now being asked to provide comments and scenarios and perhaps even issue some orders.
4. The Bell Atlantic tests are becoming more blind to the ILEC. The New Jersey test will not even use a web site to ensure that Bell Atlantic is unable to see anything about the test. All meetings between KPMG and the ILEC will be open to CLECs to listen. A "secure bridge" was even proposed by the New Jersey BPU for weekly meetings to ensure that Bell Atlantic would not be able to learn anything about the test. U S WEST should not have input into testing days, scenarios, or anything else.

5. Accordingly, MCIW requests that the Commission deny U S WEST's requests to obtain access to additional information contained in its comments filed February 4, 2000.

Dated: February 9, 2000

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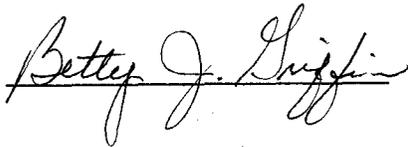
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A handwritten signature in cursive script that reads "Betty J. Griffin". The signature is written in black ink and is positioned above a horizontal line.