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AZ CORP COMMISSION  
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1 **LEWIS**  
2 **AND**  
3 **ROCA**  
4 **LLP**  
5 **LAWYERS**

**BEFORE THE ARIZONA CORPORATION COMMISSION**

6 **WILLIAM A. MUNDELL**  
7 **Chairman**

Arizona Corporation Commission

**DOCKETED**

8 **JAMES M. IRVIN**  
9 **Commissioner**

APR 23 2001

10 **MARC SPITZER**  
11 **Commissioner**

DOCKETED BY 

12  
13  
14 **IN THE MATTER OF U S WEST**  
15 **COMMUNICATIONS, INC.'S**  
16 **COMPLIANCE WITH § 271 OF THE**  
17 **TELECOMMUNICATIONS ACT OF**  
18 **1996**

**Docket No. T-00000A-97-0238**

19 **COMMENTS OF WORLDCOM, INC. REGARDING**  
20 **QWEST CORPORATION'S PERFORMANCE ASSURANCE PLAN**

21  
22 WorldCom, Inc., on behalf of its regulated subsidiaries, ("WCom") submits its  
23 comments on the take back items discussed in the April Performance Assurance Plan  
24 workshop regarding outstanding issues. These comments were served electronically on all  
25  
26

1 parties of record on April 19, 2001, and are now being filed with the Commission and  
2 served in hard copy form.

3  
4 I. **PAP 2 - Inclusion of Change Management Measures**

5 Qwest Draft of PO-16 Timely Change Management Notifications.

6 As discussed in the April workshop, Qwest needs to circulate the proposed Change  
7 Management performance measurement with the AZ and ROC TAG for further discussion  
8 and comments from other parties. WCom has included specific comments on Qwest's  
9 DRAFT - 02 Apr 01, on Exhibit A, attached.

10  
11 Software Validation.

12 Qwest stated it did not address and present this as a proposed performance measure  
13 because the test bed issues are still being discussed in the CICMP forum. WCom would  
14 like to keep open the ability to have this measure re-addressed once the test bed issues are  
15 resolved.

16  
17 Percent Software Problem Resolution Timeliness.

18 In the April workshop, there was concern by both WCom and DCI (Haygood), that  
19 Qwest did not provide a proposal on this measure. Qwest agreed to take this back and take  
20 another look at it. Again, WCom requests that Qwest re-look at making a proposal on this  
21 measure. WCom feels that it is important to measure the time to resolve significant  
22 software failures related to new releases. Software errors can have a significant impact by  
23 disabling CLECs ability to conduct business.  
24  
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1 **II. PAP 3 - Root Cause Analysis**

2 As discussed in the April workshop, Qwest would apply aggregate CLEC data for  
3 Tier-1 measures; thus, eliminating the need to limit investigations to Tier-2 only. WCom  
4 supports and would like to see applicable language taken from the amended TX plan  
5 included:  
6

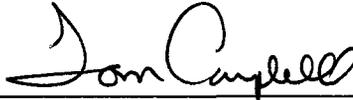
7 In the event Qwest misses any measurement for two consecutive  
8 months, and for each succeeding violation of that measurement,  
9 Qwest shall conduct an investigation to identify the problem and  
10 take corrective action. In addition, Qwest shall report and post such  
findings and a description of corrective action on its web site.

11 **III. PAP 11 - Audit**

12 WCom disagrees with Qwest's proposal that an ongoing monitoring program of  
13 performance measurements and the reporting of performance results be adopted in lieu of  
14 a comprehensive annual audit. As WCom pointed out in its 1/29/01 comments, third-party  
15 OSS audits generally only check the math of calculations, exclusions, adherence to  
16 business rules, etc. of historical data. Auditors generally make no representation about or  
17 have any obligation to transactions occurring subsequent to the OSS audit. Any plan must  
18 include requirements for periodic comprehensive audits to ensure that Qwest continues to  
19 produce reliable data and reporting. WCom continues to support an annual comprehensive  
20 audit of Qwest's reporting procedures and reportable data, including all systems, processes  
21 and procedures associated with the production and reporting of performance measurement  
22 results.  
23  
24  
25  
26

1 DATED this 23<sup>rd</sup> day of April, 2001.

2 LEWIS AND ROCA LLP

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15 ORIGINAL and ten (10)  
16 copies of the foregoing filed  
17 this 23<sup>rd</sup> day of April, 2001,  
with:

18 Arizona Corporation Commission  
19 Docket Control - Utilities Division  
1200 W. Washington Street  
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21 COPY of the foregoing hand-  
22 delivered this 23<sup>rd</sup> day of April,  
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23 Maureen Scott  
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25 *Betty J. Griffin*  
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<p><b>Purpose:</b> Measures the percent of release notifications for changes to specified OSS interfaces sent by Qwest to CLECs within the intervals required by the change management plan.</p>	
<p><b>Description:</b></p> <ul style="list-style-type: none"> <li>Measures the percent of timely release notices: Draft Developer Worksheets (Initial Requirements), Disclosure Documents (Final Requirements) and Release Notes, sent to the CLEC, within the intervals/timeframes prescribed by the release notification procedure documentation for the following OSS interfaces in Qwest: IMA-GUI, IMA-EDI, and CEMR.</li> </ul> <p>WCom Comment: Purpose and description should address both timely and complete notices. EXACT and EB-TA changes need to be included because CLEC's utilize these interfaces for local ordering purposes.</p> <ul style="list-style-type: none"> <li>Includes release notifications by Qwest to CLECs for four types of changes, including (1) CLEC-initiated changes, (2) Qwest-initiated changes, (3) changes in industry standards, and (4) changes required by regulatory agencies.</li> </ul> <p>WCom Comment: Regardless of the source requiring the change, release notifications are solely written and submitted by Qwest. Therefore, WCom doesn't see a need for this bullet.</p> <ul style="list-style-type: none"> <li>Includes all release notifications pertaining to OSS interfaces, subject to the exclusions specified below.</li> <li>Notifications sent on or before the date required by the change management plan are considered timely.</li> </ul> <p>WCom Comment: The specifics of the "change management plan" need to be validated. Presumably this is a Qwest developed plan that takes into account release notice requirements imposed by regulatory.</p> <ul style="list-style-type: none"> <li>Notifications sent after the date required by the change management plan are considered untimely. Notifications required but not sent are considered untimely.</li> </ul>	
Reporting Period: One month	Unit of Measure: Percent
Reporting Comparisons: CLEC Aggregate	Disaggregation Reporting: Region-wide level.
<p><b>Formula:</b> (Number of required release notifications for specified OSS interface changes made within the reporting period that are sent on or before the date required by the change management plan/Total number of required release notifications for specified OSS interface changes within reporting period) * 100</p>	
<p><b>Exclusions:</b></p> <ul style="list-style-type: none"> <li>Changes related to emergency fixes.</li> </ul> <p>WCom Comment: If CLEC's are impacted by a change to Qwest OSSs, notification must be provided. Therefore, this measurement will need to capture when notification was provided to CLEC's and determine for emergency fixes whether the notification was timely or not.</p> <ul style="list-style-type: none"> <li>CLEC initiated changes to Final Requirements (excluding changes requested due to a mistake by Qwest identified by the CLEC)</li> </ul> <p>WCom Comment: This exclusion is unclear. How will this be captured? Specifically, who decides whether the change is a "mistake by Qwest"?</p> <ul style="list-style-type: none"> <li>Changes that fall outside the change management plan.</li> </ul> <p>WCom Comment: The "change management plan" needs to be validated. How will these changes be captured?</p> <ul style="list-style-type: none"> <li>Changes where Qwest and CLECs agree, through the CICMP process, that notification is unnecessary</li> <li>Changes involving EXACT or EB-TA.</li> </ul> <p>WCom Comment: EXACT and EB-TA systems are utilized by CLEC's to support local ordering needs. Therefore, they should not be excluded from release notification requirements.</p>	
Product Reporting: None	Standard: Diagnostic for 6 months; address

	<p>benchmark at the end of completing 6 months of data</p> <ul style="list-style-type: none"><li>• WCom Comment: Qwest is obligated to provide release notifications to CLEC's in a timely manner today. Therefore, WCom recommends a benchmark of 98% be imposed immediately, all though we see such notification as an absolute requirement of Qwest.</li></ul>
<p><b>Availability:</b> TBD upon approval of TAG</p>	<p><b>Notes:</b></p>