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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission
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AZ CORP COMMISSION
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Commissioner

IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996	)))))	Docket No. T-00000A-97-0238

Staff's Response to AT&T's Motion to Suspend Testing

Staff of the Arizona Corporation Commission ("Commission Staff") submits the following response to AT&T's August 9, 2001 Motion to Suspend Testing of Qwest Corporation's Operational Support Systems ("OSS") due to an alleged failure on the part of the Staff and its Test Administrator to follow the procedures prescribed in the Master Test Plan ("MTP") and Test Standards Document ("TSD"). The Staff is also filing this response on behalf of its Test Administrator, Cap Gemini Ernst & Young Telecom Media Networks ("CGE&Y").

I. INTRODUCTION

Section 271 proceedings are very complex, time-consuming processes. The Arizona 271 process has been going on for over two years now. Naturally, with a proceeding of such complexity, there is likely to be disagreement from time to time over how a portion or portions of the test are conducted. AT&T has been a significant contributor to the Arizona Test and has helped to make the Arizona OSS test one of the most rigorous tests in the country to-date. For this reason, Staff and its Consultants take the concerns expressed by AT&T very seriously and intend to take remedial actions as appropriate to ensure that AT&T's concerns are addressed.

This is not to say that Staff agrees with many of the allegations contained in AT&T's Motion. Staff believes that some of the allegations contained in AT&T's Motion are simply the result of interpretational differences with regard to the underlying test documents. Staff and the parties are not always going to agree on how the provisions of the MTP and TSD are to be

interpreted. However, there is a process in place when such interpretational differences arise or come to light and Staff believes that that process has been followed in all cases. Other concerns raised by AT&T go to the timeliness with which it is receiving certain test reports. Rather than being a deliberate attempt by Staff and its Consultants to stone-wall or not provide the information, the delay in the delivery of some information had more to do with the complexity of the engagement and the need to manage and prioritize issues and tasks which arose during the course of the test. In addition, the Arizona test has been one of the most open and collaborative tests in the country, and as discussed below, the parties have enjoyed unprecedented access to information.

Still other concerns expressed by AT&T go directly to the conclusions reached by the Test Administrator in certain of its interim Reports. In particular, AT&T disagrees with certain of CGE&Y's conclusions in its interim Retail Parity Evaluation. Staff believes that AT&T's allegations are premature, however, and are more appropriately resolved through the existing Workshop processes that were set up to specifically give parties an opportunity to question the Test Administrator on the findings and conclusions contained in its Reports.

Underlying many of AT&T's concerns appears to be the belief that the Staff and CGE&Y are attempting to rigidly adhere to all deadlines without regard for the processes set out in the test documents. This concern is unfounded. The Staff and its Consultants have never once sacrificed quality or test integrity simply for the sake of meeting a deadline. This is evidenced by the fact that there have been at least four notification of delay letters issued by CGE&Y which resulted in a delay in the various portions of the test.

In summary, Staff and its OSS Test Administrator have followed the processes set out in the TSD and MTP. Further, Staff and CGE&Y are more than willing to make the commitments requested by AT&T on page 18 of its Motion, "to abide by the MTP and TSD, seek TAG input, [and] provide the TAG members with legitimate information and conduct the test consistent with its purpose." The Staff and CGE&Y believe that they have been doing this all along, and will certainly commit to do this in the future, as well. Staff and CGE&Y are also willing to commit to try to address as many of AT&T's concerns as possible. Indeed, both Staff and CGE&Y have taken steps to address certain of AT&T's concerns already. However, Staff believes that this can be done

without suspension of the test; and that suspension of the test at this time would not be appropriate.

II. DISCUSSION

A. Staff and CGE&Y Have Followed The Process Set Forth in the MTP and TSD and Have Never Ignored The Process or Requirements Contained in Either Document Simply to Meet a Deadline.

AT&T argued several times in its Motion that Staff and CGE&Y have failed to follow the MTP and TSD.1 To the contrary, Staff believes that it and CGE&Y have adhered to the processes set forth in the MTP and TSD, and will address each of the specific instances cited by AT&T below. Staff believes, as will be apparent from the discussion below, that some of AT&T's concerns stem from differences in interpretation of the provisions of the MTP and TSD.

1. Functionality Test

- On page 3 of its Motion, AT&T raises an issue which arose early on in the test relating to the Performance Measurement Evaluation ("PME") and the need to review three consecutive months of historical data before the start of the Functionality Test. The issue eventually went to "impasse" which means that there was disagreement among the TAG members as to the issue which required ACC resolution through what is known as an "impasse decision."2 The ACC Staff did an exhaustive review of the language of both the MTP and TSD and determined in its Impasse Decision that while both documents required the review of three months of historical performance data for the PME, the review of three months data for each Performance Indicator Definition ("PID") was not a prerequisite to start of the Functionality Test. The ACC Staff's Impasse Decision was approximately 9 pages in length, and went on to note that while the review of three months data was not expressly required under either document, the ACC Staff would require such a review where the data was available. Where it was not available, the decision was to be left to the discretion of the Test Administrator, with TAG input. As AT&T notes in its Motion, this issue has since been rendered moot since CGE&Y has now reviewed at least three months of data for all PIDs.

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1 The MTP and TSD set forth the parameters to govern the manner in which the test of Qwest's OSS will be conducted. Both documents were the result of extensive negotiation by the Test Advisory Group ("TAG"). The MTP defines the TAG as "A Test Advisory Group (TAG), consisting of the ACC, its consultant, the Test Administrator, the Pseudo-CLEC, U S WEST and those CLECs and other participants who wish to participate will be established. Its purpose will be to act as a communications mechanism to advise all parties of test results, exceptions, and corrective action and to provide CLEC feedback on the testing.

2 The TAG consists of both voting and nonvoting members. The Staff and its Consultants are not voting members of the TAG. All other participants are voting members.

2. Retail Parity Evaluation

- On page 6 of its Motion, AT&T states that the "scope" of the Retail Parity Evaluation ("RPE") was modified from the methodology outlined in the TSD and MTP, without TAG approval. First, Staff wishes to clarify that the wording of the RPE Interim Report which was reviewed at a recent Workshop, mischaracterized this revision as a change in "scope" in the test. In actuality, as CGE&Y noted at the Workshop, its two phased approach did not change the RPE's "scope" but merely resulted in a change in the number of iterations for the statistical analysis conducted as part of the RPE. CGE&Y agreed to clarify this statement in its Final Report. As AT&T notes in its Motion, CGE&Y presented its White Paper on the Phase I results at a TAG meeting. TAG approval was not possible because AT&T and others reserved comment on the White Paper until the end of the test. However, no party, including AT&T, protested to proceeding with the RPE, as planned by CGE&Y. At the Workshop on CGE&Y's interim RPE Report held the last week of July, no party expressed concern with the statistical methodology used by CGE&Y. Staff believes that the statistical methodology utilized by CGE&Y is sound and that the record from the Workshop verifies this fact.

- On pages 7 through 9 of its Motion, AT&T claims that test processes as set forth in the TSD were not followed because none of the findings of deficiencies in Qwest's processes during the RPE were logged into the Master Issues Log ("MIL"). It should be noted that when the TSD was finalized, not all test processes and procedures had been developed and agreed upon. Significantly, the Incident Work Order ("IWO") process which was adopted to notify Qwest and the parties of deficiencies in Qwest's systems or processes, had not yet been developed at the time the TSD was finalized. The IWO process was subsequently developed by CGE&Y and agreed to by all of the parties, and essentially performs the same function as the MIL in that it provides notification of and tracks issues (in the case of the IWO, deficiencies discovered during the testing process) from their inception through their resolution. Thus, while it is true that no testing deficiencies were logged to the MIL, they were recorded and reviewed through the IWO process which performs the same function as the MIL, but which is a more specialized process specifically developed to record testing incidents and deficiencies only. Further, the parties have as much or more input through the IWO process as they do through the MIL process. Simply put, there would have been nothing to be gained by following both the IWO and MIL processes to identify and track testing deficiencies discovered since both processes accomplish the same purpose.

- On Page 9 of its Motion, while it is correct as AT&T claims that no issues were logged to the MIL, CGE&Y did issue a total of 25 IWOs during the Retail Parity Evaluation. Appendix A of the interim Retail Parity Evaluation contains a listing of those IWOs. Under the IWO process, AT&T and all participants have the right to comment on Qwest's response to any IWO. In addition, if there is any disagreement, AT&T and all participants have the right under the IWO process to bring any IWO, Qwest's response and CGE&Y's resolution back to the TAG for

discussion. AT&T has exercised this right many times. Thus, Staff cannot agree with AT&T's characterization on page 9 of its Motion, that somehow it was prevented from having input into any problems discovered and tracked through the IWO process or that Qwest did not have to justify any disparities to the TAG, or correct any problems. Also, AT&T appears to have lost sight of the stated purpose of the RPE which, because of its highly subjective nature, was designed to look at the more general question of whether the CLEC resale representatives experience in entering LSRs is comparable to the Qwest retail representative and if there are differences, whether they prevent the CLEC from having a meaningful opportunity to compete. Arizona is the first State in the country to undertake the RPE evaluation. However, because Arizona also did a Functionality Test, like all other independent Third-Party OSS Tests, the RPE was very narrow in scope.

3. **Capacity Test**

- On page 10 of its Motion, AT&T discusses several concerns regarding the process followed by Staff and CGE&Y during the Capacity Test. AT&T first argues that blindness of test operations was compromised due to CGE&Y's inclusion of exact volumes of hourly test transactions in the Capacity Detailed Test Plan that was distributed. AT&T notes that it objected to inclusion of this information in the initial plan and that the information was redacted from later versions of the Detailed Test Plan. Staff agrees that inclusion of the volumes in the initial test plan was an oversight and not appropriate. However, once the matter was raised by AT&T, CGE&Y redacted the information. In addition, CGE&Y used updated volume and timing information which was not revealed to any party thereby blindness was preserved.

- On page 11 of its Motion, AT&T asserts that Staff and CGE&Y commenced the Capacity Test without resolving all of the outstanding issues related to the Capacity Test's entrance criteria. First, nothing in the MTP or TSD precludes Staff from expediting an impasse issue and its impasse resolution report. Further, both Staff and CGE&Y believed that all of the Capacity Entrance Criteria had been met and that all of AT&T's concerns had been resolved. It was only after the Capacity Test had run, that Staff first became aware that AT&T had several questions which it considered to be outstanding and for which responses had not been provided. The Capacity Test ultimately had to be rerun for technical reasons. However, before it was rerun, Staff asked AT&T to identify all of its unresolved issues and questions in writing and Staff and CGE&Y met with AT&T and discussed all of these issues and resolved them before the Capacity Test was run again. To prevent oversights of this nature from happening again, Staff has asked CGE&Y to develop a separate MIL for CLEC and Capacity Test Sub-Committee meetings so that all action items can be recorded and tracked. Finally, AT&T states that the time-stamp issue was never brought back to the TAG for resolution. However, nothing prevented AT&T from asking that a TAG meeting be called for the purpose of discussing this issue or any of the other issues.

Staff agrees with AT&T that it is important to conduct all phases of the OSS Test in

accordance with the processes agreed to by all of the parties. Staff and its Consultant have tried to be very diligent in this regard and have attempted to steadfastly adhere to all of the requirements contained in both the MTP and TSD. This is not to say that reasonable people may not disagree as to meaning or intent of either document at times. However, the remedy in that case is for parties to bring their concerns to the TAG by requesting a meeting and asking that their concerns be placed upon the agenda for resolution. Where agreement or consensus cannot be achieved among TAG members, the impasse resolution process provides for a decision by the ACC, which has occurred a number of times.

To help address AT&T's concerns, Staff has also instructed CGE&Y to begin scheduling regular TAG meetings again every other week. The next two TAG meetings have been scheduled for August 28-29, 2001 and September 11-12, 2001.

B. <u>The Staff and CGE&Y Have Attempted to Be Responsive to AT&T's Requests, as Well as the Requests of Other Parties</u>.

Another criticism leveled against the Staff and CGE&Y by AT&T relates to the Functionality Test and the daily logs of LSR transactions and lifecycles. TSD Section 3.7.5.1 requires CGE&Y to keep daily logs of LSR transactions and specifies the data fields which are to be contained in the logs. It is correct as alleged by AT&T that the Staff and CGE&Y agreed to provide copies of the daily logs to the CLECs with a two week lag time, i.e., testing that concluded on Day 1 in a given month would be provided to the CLECs by the 15th of the month. AT&T Motion at p. 15. Staff did not agree to provide the logs to Qwest, because of the need to maintain blindness with respect to past and future test transactions.

AT&T raises essentially three concerns regarding the daily logs. First, AT&T states that it did not receive the logs on a timely basis, or in the two week cycles as agreed by Staff and CGE&Y. Staff concedes that CGE&Y fell behind on its commitment to the CLECs, and was at times late in sending the logs to the CLECs. Despite AT&T's assertion to the contrary, however, neither Staff or CGE&Y were attempting to stone-wall AT&T's requests. The logs took considerable time to develop and oftentimes CGE&Y had to undertake data reconciliation efforts and LSR lifecycle analysis before the logs could be produced. Toward the end of the Functionality Test, CGE&Y was

juggling multiple commitments related to all phases of the OSS Test and simply had to prioritize those tasks as best it could. Oftentimes in 271 tests of this nature, the type of information provided by CGE&Y is not provided until the end of the test and the Final Report is delivered. In the spirit of openness, the Staff and CGE&Y agreed to provide this data earlier on in the Arizona process.

AT&T's second concern (Motion at p. 15) relates to questions it submitted to CGE&Y on the daily logs which it received. AT&T states that it asked the questions in order to understand the contents of the daily logs. Motion at pps. 15-16. AT&T states that its questions were never answered. Id. While not to minimize AT&T's concerns, CGE&Y has had in recent months to prioritize a multitude of issues relating to all phases of the test, as well as address concerns which were brought to its attention by the Staff and consultants, and at times other parties. The fact that data of this nature is not typically provided until the end of the OSS test and the fact that the Functionality Workshop to discuss this data was months in the future all entered into the need to put resources on more critical tasks initially. It is Staff's understanding that CGE&Y is continuing to work with AT&T to respond to its questions.

AT&T's final concern regarding the Functionality Test, relates to the format of the daily logs and the information provided therein. It is correct, as AT&T states at p. 16 of its Motion, that it asked for the information to be provided in a manner that would more easily allow AT&T to analyze the data. Staff had thought this issue was resolved, but subsequently learned that CGE&Y would have to incur significant programming costs in order to provide the information in the format requested by AT&T. With the cost issue unresolved, the reports were never produced with the additional two fields of information. Staff agrees with AT&T, that it should have been informed of the decision not to produce the reports with the additional information requested much earlier. Staff has asked CGE&Y to keep MILs for both the CLEC and Capacity Subcommittee meetings in the future so that such issues can be tracked in the future.

More importantly, CGE&Y and AT&T have since met and come to agreement with regard to the additional information to be provided and when it will be made available. AT&T also has been provided with copies of all of the daily logs for the Functionality Test. Moreover, Staff believes that a separate MIL for the CLEC meetings will allow better tracking and follow through on issues

raised in those meetings. All in all, however, Staff does not believe that there has been any prejudice to the parties because the delivery of some of the information was delayed.

C. AT&T's Concerns As to the Findings and Conclusions in CGE&Y's Preliminary Reports are Premature and Should Be Resolved Through the Workshop Process.

At pps. 7-10 of its Motion, AT&T disagrees with certain of CGE&Y's interim findings in the Retail Parity Evaluation draft Final Report. Such concerns or disagreements regarding specific findings in the Retail Parity Evaluation draft Final Report should be aired in the Workshops which are held on each report. AT&T was an active participant in the RPE Workshop held on July 24-27, 2001, and questioned CGE&Y extensively on the findings and conclusions contained in its Report. AT&T, along with other parties, were additionally given an opportunity to submit briefs or comments on the Report. The Workshop transcript, along with the parties' briefs will be carefully reviewed by both CGE&Y and the Staff. If, as a result of that review, modifications to the Report and/or additional testing is deemed appropriate, it will be done. Furthermore, CGE&Y also committed on the record to make certain wording changes to the interim Report, to resolve concerns expressed by AT&T and other parties.

AT&T also claims that CGE&Y issued IWO 1110, and instead of waiting for Qwest to respond, it resolved the problem for Qwest in the RPE. AT&T Motion at p. 9. Staff disagrees with this characterization of the Report, and IWO 1110. IWO 1110 along with two other of the twenty-five IWOs issued by CGE&Y as part of the Retail Parity Evaluation remain open. However, since the Retail Parity Evaluation report is an interim or draft Final Report, it is not unexpected that a few IWOs may remain open at the time the interim Report is published. Between publication of the interim Report and publication of the Final Report, when all five reports on the five individual evaluations are consolidated, some modification to the interim Reports is contemplated. For instance, it is expected that all IWOs will be resolved. It is expected that there may also be some modification as a result of consolidating all five individual reports on the Retail Parity Evaluation, Relationship Management Test, Capacity Test, Performance Measurement Audit and Functionality Test into one Final Report, and that further IWOs may be issued as part of this process. It is also expected that there may also be some changes resulting from the Workshop process.

With regard to the RPE, Staff believes that AT&T's allegations regarding the RPE report are premature and that AT&T should follow the process that has been established, and voice its concerns through that process which includes participation in the Workshop on the individual Report, and participation in yet another Workshop on any new findings, conclusions or other changes to the interim Report, after the Final Report is published. Once, that process is concluded, AT&T will also have an opportunity to bring any remaining concerns to the Commission.

AT&T makes similar allegations with regard to the interim Relationship Management Evaluation Report, i.e., that it was released prematurely because the review and evaluation of Qwest's Co-Provider Industry Change Management Process ("CICMP") and stand-alone test environment ("SATE") were not completed. AT&T Motion at pps. 13-15. Once again, Staff would note that this is an interim Report, that there are two open IWOs covering both the CICMP and stand-alone test environment, both of which will take some time to resolve, but which should be resolved by the time the Final Report issues on all five phases of this test. Like the Retail Parity Evaluation, it is not inappropriate for some IWOs to remain open. This was contemplated when the staggered Workshop process was decided upon. However, to avoid any misinterpretations, both Staff and CGE&Y understand that all open IWOs need to be resolved before CGE&Y issues its Final Report.

With regard to the CICMP process, Staff agrees with AT&T's observation that the CICMP process is a fundamental issue. See AT&T Motion at p. 14. Staff anticipates that Qwest's proposed CICMP process will be subject to review by the TAG once it is submitted to the Commission. Given the importance of the CICMP issue overall in the context of individual 271 applications, it is difficult to conceive that Qwest would not expect a review process to be part of the Arizona 271 test or that such a review would not be necessary in order to resolve the outstanding IWO on this issue.

Moreover, the stand-alone test environment will also be subject to evaluation by the TAG, HP, CGE&Y and the Staff. TAG members recently submitted comment on HP's proposal to evaluate the Qwest stand-alone test environment. Once again, given the importance of the stand-alone test environment issue overall in the context of individual 271 applications, it is difficult to conceive that Qwest would not expect a review process to be part of the Arizona 271 test or that such

a review would not be necessary in order to resolve the outstanding IWO on this issue.

Staff does note that it recently delayed the Relationship Management Workshop for a month because of a mix-up with four of the underlying HP reports on Software Change Management, the IMA-GUI Interface, the Help Desk Relationship and the EB-TA Maintenance and Repair Interface. While CGE&Y had interviewed HP concerning HP's findings with regard to most of these items, through inadvertence, the actual reports were never provided to CGE&Y and hence were not appended to the CGE&Y interim Relationship Management Report. Staff delayed the Workshop so that the Reports could be appended, and available for review by the parties before and during the interim Workshop process.

Finally, AT&T raises similar concerns about premature release of the Functionality Test Interim Report which has not yet been published. To-date there have been 65 IWOs issued on the Functionality Test. It is anticipated that more will be issued in the near future. Neither Staff or CGE&Y intend to issue the Functionality Report without all IWOs having been issued and Qwest having had the opportunity to respond to them. AT&T's concerns in this regard are premature.

D. <u>The Arizona OSS Test Has Been and Continues to be the Most Open and Collaborative Test in the Country To-Date and The Parties Have Had Unprecedented Access to Information and the Ability to Participate in This Proceeding</u>.

Staff believes that the record reflects and will continue to reflect that all parties, including AT&T, have had unprecedented access to information and ability to participate in this proceeding. The test was intentionally designed to ensure the greatest degree of openness and participation by interested parties possible. AT&T was a major architect of the test's design and has helped to make this test the most comprehensive and rigorous test in the country to-date. It was because of a request to Staff by AT&T when the test first began, which was subsequently agreed to by all parties including Qwest, that the test design was adapted to become one of the most open and collaborative in the country to-date. The following points are evidence of how extensive this involvement has been.

- The parties have had full participation in determining the testing

requirements, including having substantial input into the MTP and TSD.

- The parties are given ample opportunity into testing decisions through their participation in TAG meetings, TAG Subcommittee meetings and CLEC meetings.

- The parties have been given extensive opportunities to comment on CGE&Y's draft final Reports when made available and will have that opportunity for each portion of the test.

- The parties have been given the opportunity to question CGE&Y employees under oath at Interim Workshops on all of the findings and conclusions contained in the draft Final Report. In total, four weeks of such Workshops have been scheduled. This does not include a Final Workshop, which has yet to be scheduled, in which the parties will have the opportunity to address any modifications reflected in CGE&Y's Final Report.

- During the Workshops, the parties have the ability - and have - submitted extensive written questions and follow-ups to those questions on any aspects of the individual Reports.

- When CGE&Y determines that an issue regarding test results exists, it issues an IWO, which is communicated to the parties for their comments. Parties may also ask questions about or comment on any IWO and its resolution during the Workshop.

In addition, CGE&Y makes all of the underlying data for each Report available for parties' review before the Workshop. Such data is customarily not made available in 271 proceedings until after the Final Report is issued. When all of this is considered, Staff does not believe AT&T's concerns about not receiving sufficient information or not being involved in testing decisions is warranted. Staff believes that the parties to this proceeding have had an unparalleled opportunity for participation and input into the Test.

E. <u>The Arizona OSS Test Has Been Conducted at all Times With an Emphasis on Maintaining Test Integrity and Ensuring Quality and Accurate Results</u>.

The underlying theme in AT&T's comments is that Staff and CGE&Y "are wedded to finishing the test based on the project plan, at all costs, even if it means disregarding the MTP and TSD." AT&T Motion at p. 6. Once again, Staff believes that this complaint is unwarranted. Contrary to AT&T assertions, the TAG's input into the initial project plan was solicited and

obtained. Furthermore, nothing prevents AT&T or any other party from participating in discussions on the project plan. The dates in the project plan are not set in concrete but are subject to change depending upon the progress of the OSS tests and the problems identified. There have been at least four notification of delay letters issued by CGE&Y to Qwest and the Staff setting forth changes in testing completion dates because of intervening events. The latest of these was issued just last week regarding the Functionality Test.

Staff is committed to conducting this test in an open and collaborative fashion and ensuring that any decisions that are made concerning the test have as their primary objective that of maintaining test integrity and ensuring quality and accurate results. AT&T is an important part of the Arizona OSS Test, and Staff and CGE&Y are committed to resolving any remaining concerns AT&T may have. Staff does not believe, however, that suspension of the Test at this time is appropriate.

III. CONCLUSION

In conclusion, Staff urges the Commission to reject AT&T's Motion to Suspend the Test. Staff and CGE&Y have followed and will continue to follow established test processes as set out in the MTP and TSD. Staff and CGE&Y will also continue to work with AT&T to resolve any remaining concerns it may have.

RESPECTFULLY SUBMITTED this 21st day of August, 2001.

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