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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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Arizona Corporation Commission

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IN THE MATTER OF U S WEST)
 COMMUNICATIONS, INC.'S)
 COMPLIANCE WITH SECTION 271 OF THE) DOCKET NO. T-00000A-97-238
 TELECOMMUNICATIONS ACT OF 1996)
 _____)

COMMENTS OF WORLDCOM ON QWEST'S CMP STATUS REPORT

WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits these comments in response to the Status Report filed by Qwest Corporation ("Qwest") concerning the status of the change management process and efforts to redesign that process.

INTRODUCTION

WorldCom is an active participant in Qwest redesign forum. WorldCom supports the efforts of all participants to develop a process that collaboratively addresses the changes to Qwest's operational support systems ("OSS"), Qwest's product offerings and Qwest's processes that impact and support Competitive Local Exchange Carriers ("CLEC") local ordering needs.

The redesign forum resulted from comments received by Qwest in the various 271 workshops. WorldCom, in its testimony and exhibits filed for the general terms and conditions workshop, emphasized the inadequacies of Qwest's Co-provider Industry

WorldCom has been frustrated by the fact that Qwest has historically changed its Product Catalog ("PCAT") and other documents by sending notification of these changes to the CMP participants, without also making the 271 workshop participants aware of these changes. This is in violation of Qwest's stipulation to submit such changes to CMP and to the 271 workshop participants.

Changed documents should be submitted to CMP and to the CLECs on the service list for the 271 workshops, consistent with the terms of the stipulation. Changes should be and should have been cross-referenced when Qwest finished changing these documents so that changes were apparent and the reason for the changes was evident. It was also expected that such notice and explanation of the changes would be done by Qwest in a timely manner, consistent with the stipulation, so that CLECs would have a meaningful opportunity to review these cross-references, reconcile concerns with Qwest, if possible, and, if concerns remained, bring those issues back to the Commission for resolution.

In the CMP re-design process, the parties have discussed an interim process by which Qwest will mark changes to all product documents (PCAT, Tech Pubs and other product documents) and provide an historical change log so CLECs can quickly see what has changed and why the changes have been made. Qwest will also be required to submit a change request in some circumstances. In that forum, Qwest only wanted to do this marking of changes on a going-forward basis, however, the CLEC participants in the redesign process pointed out that Qwest has been sending out modified product documents for several months and they have been very difficult to review because changes were not marked and no useful explanation of the changes has been provided.

In CMP redesign, the CLECs have repeatedly requested that Qwest go back and identify the changes to these documents and explain the reason for the changes, because that is what Qwest agreed to do in the 271 workshops. At the CMP redesign meeting held on October 16, 2001, Qwest responded that for PCAT changes it would only go back to the first PCAT version to mark changes. It further advised that it would not start this work until January 2002 and it would take three months to complete. It is unclear when the first "PCAT" version came into being since it replaced the Interconnect Resource and Resale Guide ("IRRG") at some point. In addition the PCAT is not dated or marked with version numbers. With regard to technical publications, Qwest is still researching the question. These responses are thus far unacceptable and this issue is far from closed in CMP.

These changes have a dramatic impact on CLECs. New products allow a better range of service that CLECs can provide their end users. Such new products may require the amendment of existing interconnection agreements, which has proven to be a time-consuming process. Process changes that impact how CLECs currently do business require training to ensure CLEC customers are not adversely impacted. For both product and process changes, adequate and timely notice of the changes is essential.

CONCLUSION

WorldCom intends to continue addressing its concerns with Qwest and other CMP participants so that WorldCom's input, as well as that from other CLECs, will result in a CMP that is meaningful, fair, equitable and consistent with FCC requirements. The redesign sessions scheduled through the end of this year are "jam packed" with critical pieces for a valid change management process that will require extensive

discussions. WorldCom is committed to working with all parties to ensure all the necessary requirements are addressed and established.

Dated: October 23, 2001

WORLDCOM, INC.

By: 

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CERTIFICATE OF SERVICE

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