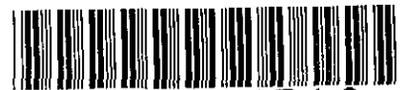


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BEFORE THE ARIZONA CORPORATION COMMISSION

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**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 RELATIONSHIP
MANAGEMENT EVALUATION
BRIEF**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix,
(collectively, "AT&T") hereby file their brief on the Relationship Management
Evaluation.

**I. CGE&Y Failed to Perform Formal Interviews With CLECs in Compliance
with TSD Requirements and Such Failure Renders CGE&Y's Findings With
Respect to Account Establishment, Account Maintenance and EDI
Development Suspect.**

For the competitive local exchange carrier ("CLEC") Account Establishment and
CLEC Account Management Evaluations, both the Master Test Plan¹ and the Test
Standards Document² identify two major activities that Cap Gemini Ernst & Young
("CGE&Y") must complete as part of the overall evaluations. Those two activities are

¹ Master Test Plan for Testing Qwest's Operational Support Systems in Arizona, Version 4.2, June 29,
2001 ("MTP").

² Cap Gemini Telecommunications 271 Test Standards, Version 2.10, September 6, 2001 ("TSD").

(1) reviewing Qwest documentation and (2) performing interviews with Qwest, Pseudo-CLEC and CLEC personnel.

Section 7.2.1 of the MTP identifies the following as one of the CLEC Account Establishment Evaluation activities:

The Test Administrator will perform interviews with the Pseudo-CLEC, participating CLEC's and Qwest personnel to document the experiences encountered when establishing a new CLEC account.

Section 6.2.3.3 of the TSD includes the following as one of the CLEC Account Establishment activities:

The TA will perform interviews with the Pseudo-CLEC, participating CLECs and Qwest personnel to document the experiences encountered when establishing a new CLEC account.

Section 7.2.2 of the MTP identifies the following as one of the CLEC Account Management Evaluation Activities:

The Test Administrator will perform interviews with the Pseudo-CLEC, participating CLEC's and Qwest personnel to document the experiences encountered in regards to Responses to Account inquiries, Help Desk Call Processing, Help Desk call closures, Help Desk Status Tracking, Problem Escalation, Forecasting, and Communications

Section 6.3.2.3 of the TSD identifies one of the CLEC Account Management Activities as:

The Test Administrator will perform interviews with Pseudo-CLEC, participating CLECs and Qwest personnel to document the experiences encountered in regards to the timeliness, accuracy and completeness of Qwest responses to Account inquiries, the timeliness and responsiveness of Help Desk Call Processing, the appropriateness and methods applied to Help Desk call closures, the actual performance of Help Desk Status Tracking activities, the frequency and appropriateness of Problem Escalation efforts that are taken in response to CLEC inquiries, the reasonableness of Forecasting requests and the extent to which forecast information is applied by Qwest into its various planning activities, and communications avenues that are available to CLECs by Qwest and the extent that these are effective.

Unquestionably, both the MTP and the TSD required CGE&Y to perform interviews with Qwest, CLEC and Pseudo-CLEC personnel. Despite the clear requirement in both the MTP and the TSD to perform interviews with Qwest, Pseudo-CLEC and CLEC personnel, CGE&Y unilaterally decided that questionnaires were an acceptable substitute for interviews with CLECs. CGE&Y's opening comments during the Relationship Management Evaluation Report workshop made it clear that CLECs were not formally interviewed as part of the Relationship Management Evaluation and that CGE&Y considered questionnaires as a substitute for formal interviews.

These questionnaires took the place of in-person interviews in many instances. And the results of these questionnaires are in the room that we refer to as the viewing room and have been made available to all interested parties. In some cases we did conduct interviews, but mostly it was with Qwest personnel. And that was in their account establishment or their account management or their EDI, electronic data interchange, IMA, interconnect mediated access development group, and people who are responsible within Qwest for management of the CICMP process. Informal interviews were conducted from time to time with various CLECs, as well.³

During the workshops, CGE&Y confirmed that it did not perform interviews with CLECs for either the account establishment or account maintenance evaluations.⁴

CGE&Y also confirmed during the workshop that, "it was our interpretation that it was acceptable and adequate to use for those CLECs who wanted to and opted to respond to take the written responses to our questionnaire as their position."⁵ Even when the questionnaire responses came back and were characterized by CGE&Y as "skimpy at best," CGE&Y did not consider following the requirements of both the MTP and TSD by

³ Dryzgala, Tr. Vol. 1, October 9, 2001, pp. 17 – 18 (emphasis added).

⁴ Dryzgala, Tr. Vol. 1, October 9, 2001, pp. 104 - 105.

⁵ Dryzgala, Tr. Vol. 1, October 9, 2001, p. 105, lls. 8 - 11.

conducting formal interviews with the CLECs.⁶

Both the TSD and the MTP directed CGE&Y to perform formal interviews with CLECs for a very good reason. The reason is that the operational folks that should have been the subject of the interviews may not have the time or the written communication skills to effectively describe their account evaluation and account management experiences through a questionnaire. AT&T was one CLEC that cautioned its operational folks that were filling out the questionnaire to not get overly concerned about the responses because there would be follow-up interviews.⁷ Particularly with technical personnel, face-to-face interviews or interactive interview via the telephone can be much more informative than reading from questionnaire responses.⁸ AT&T also contacted CGE&Y when AT&T did not receive a request by CGE&Y for a follow-up interview and was informed that AT&T would not be interviewed.⁹ AT&T finds it disturbing that even when CGE&Y received CLEC questionnaire responses that it considered to be “skimpy” it still did not see fit to follow the MTP and TSD and perform formal interviews with the CLECs.

AT&T also finds it disturbing that while questionnaires were almost the exclusive means that CGE&Y used to elicit information from CLECs, CGE&Y did not see fit to elicit information from Qwest solely through the use of questionnaires. Instead, CGE&Y took the time and the effort to get “the Qwest side of the story” through formal interviews with multiple Qwest personnel. Judging from the *Final Report Relationship Management Evaluation*, CGE&Y apparently placed much greater evidentiary weight

⁶ Dryzgala, Tr. Vol. 1, October 9, 2001, p. 107, lls. 14 - 16.

⁷ Finnegan, Tr. Vol. 1, October 9, 2001, pp. 106 – 107.

⁸ Finnegan, Tr. Vol. 1, October 9, 2001, pp. 100 – 101.

⁹ Finnegan, Tr. Vol. 1, October 9, 2001, pp. 106 – 107.

and was much more impressed by formal interviews than with responses to the questionnaires. In the section of the report dealing with the CLEC Account Establishment Evaluation, CGE&Y devoted approximately one typed page to the CLECs' responses to the questionnaires and five typed pages to the Qwest interviews.¹⁰ In the section of the report dealing with the CLEC Account Management Evaluation, CGE&Y devoted approximately one typed page to the CLEC's responses to the questionnaires and two typed pages to the Qwest interviews.¹¹ AT&T suggests that had CGE&Y followed the TSD and performed formal interviews with CLECs, the CLEC input would not be as "skimpy" as were the responses to the questionnaires.

CGE&Y claimed it conducted interviews with Pseudo-CLEC personnel concerning CLEC Account Establishment and CLEC Account Management.¹² However, there is no evidence that CGE&Y used the results of the Pseudo-CLEC interviews to reach any of its conclusions for either CLEC Account Establishment or CLEC Account Maintenance evaluations. In describing the Pseudo-CLEC experience in the *Final Report Relationship Management Evaluation*, CGE&Y stated, "[t]he following summary is based upon the final report of the CLEC account establishment process given by [Hewlett-Packard], the Pseudo-CLEC for the Arizona 271 evaluation.¹³ The *Final Report Relationship Management Evaluation* makes no mention of the results of any of the interviews with the Pseudo-CLEC. A similar absence of any indication of interviews with the Pseudo-CLEC can be found in the CLEC Account Management Evaluation

¹⁰ *Final Report Relationship Management Evaluation*, DRAFT Version 3.0, September 11, 2001 ("RME"), pp. 9 – 14.

¹¹ *Id.*, pp. 33 – 36.

¹² Ferris, Tr. Vol. 1, October 9, 2001, pp. 28 – 29.

¹³ RME, p. 22.

sections. In describing the Pseudo-CLEC experience, the *Final Report Relationship Management Evaluation* states:

The summary below is based upon the following reports issued by HPC, the Pseudo-CLEC for the Arizona 271 evaluation:

- “CLEC 12-Step Process Report for 271 Test Generator” – Version 2.0
- “Help Desk Relationship Report for 271 Test Generator” – Version 3.0¹⁴

CGE&Y also failed to follow the MTP and TSD by not interviewing CLECs as part of the Electronic Interface Development Evaluation. As part of the Interface Development Evaluation, the MTP states:

The Test Administrator will observe the processes for design and development of an EDI interface and the processes for design, development testing and implementing an IMA-GUI Interface to the Qwest OSS. The Test Administrator will conduct interviews with Qwest, 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.¹⁵

The Electronic Interface Development Evaluation section of the TSD states:

The TA will observe the processes for design, development, testing and implementation of EDI, EB-TA and Billing interfaces and the processes for acquiring and implementing an IMA-GUI Interface to the Qwest OSS. The TA will conduct interviews with Qwest, Pseudo-CLEC, and CLEC personnel. This will identify and track OSS interface development and implementation activities while they are in progress.¹⁶

CGE&Y admitted during the workshops that there were no interviews with any CLEC personnel in its evaluation of Qwest’s processes supporting CLEC interface development.¹⁷ CGE&Y also admitted during the workshops that there were no formal

¹⁴ *Id.*, p. 36.

¹⁵ MTP, p. 52 (emphasis added).

¹⁶ TSD, pp. 6-14 (emphasis added).

¹⁷ Dryzgala, Tr. Vol. II, October 10, 2001, p. 382, lls. 7 - 11.

interviews with any Pseudo-CLEC personnel in its evaluation of Qwest's processes supporting CLEC interface development.¹⁸

In summary, CGE&Y was negligent in the performance of the CLEC Account Establishment, CLEC Account Management and Interface Development activities in that it did not perform formal interviews with CLECs. Had those interviews been performed, AT&T believes the conclusions that CGE&Y reached would have been much different.

II. CGE&Y Has Prematurely Reached Conclusions That Are Not Supported by any Facts or CGE&Y Analysis.

The TSD states that, "[t]he Electronic Interface Development Evaluation is an evaluation of the Qwest Interface Development and Implementation Documentation for EDI, EB-TA and Billing Activities development and IMA-GUI installation."¹⁹ During the workshop, CGE&Y admitted that it had not completed its analysis of the Hewlett-Packard findings regarding the *EB-TA Specification Report*²⁰ or the *Billing Supplement Report*.^{21 22} Notwithstanding CGE&Y's admission that the analysis of Hewlett-Packard's EB-TA and Billing Supplement Reports were "a work in progress"²³ and, as previously discussed, CGE&Y failed to perform any formal interviews with CLEC, Pseudo-CLEC or Qwest personnel, CGE&Y stated that, "CGE&Y found Qwest's interface development process to be generally sound in most areas."²⁴ Given CGE&Y failed to follow the complete set of evaluation activities contained in the TSD and that CGE&Y had not completed its analysis of two of the three interfaces that were subject to the interface

¹⁸ *Id.*, p. 382, lls. 12 - 16.

¹⁹ TSD, pp. 6-13.

²⁰ Ex. HP 2-6.

²¹ Ex. HP 2-7.

²² Dryzgala, Tr. Vol. 1, October 9, 2001, pp. 194 - 195.

²³ *Id.*, p. 204, l. 1.

²⁴ RME, p. 6.

development evaluation, it is both premature and inappropriate for CGE&Y to have reached the conclusion it did.

CGE&Y also prematurely and inappropriately reached the conclusion “that Qwest’s account management processes were generally sound, although these processes appear to require reinforcement and/or improvement due to the many negative comments received from CLECs on this subject.”²⁵ Qwest’s Help Desk support is one of the major processes that were subject to the CLEC Account Management Evaluation. During the workshop, CGE&Y admitted that it had not finished incorporating the Hewlett-Packard *Help Desk Relationship Report*²⁶ findings into the Relationship Management Report.²⁷ Given that CGE&Y had not completed its analysis of the *Help Desk Relationship Report* findings, CGE&Y’s account management process conclusions were premature.

CGE&Y also closed Incident Work Orders (“IWO”) related to negative Help Desk findings without a proper verification of the resolution. AZIWO1145-1 was issued by CGE&Y in response to Pseudo-CLEC findings on the responsiveness of the Qwest Help Desk to Pseudo-CLEC calls. In verifying that IWO1045-1 was closed, CGE&Y stated:

CGE&Y understands that Qwest is not able to directly address the specifics of these 549 calls which were handled by Qwest help desk personnel. The purpose of the IWO was to bring to the surface and document an experience that CLECs may encounter when trying to conduct business with Qwest.²⁸

The essential elements of the IWO process are: 1) CGE&Y identifies problem, 2) Qwest fixes problem and 3) CGE&Y verifies that the problem has indeed been fixed.

²⁵ *Id.*, p. 5.

²⁶ Ex. HP 2-5.

²⁷ Dryzgula, Tr. Vol. 1, October 9, 2001, p. 194, lls. 5 – 22.

²⁸ Performance Acceptance Certificate, AZIWO1045-1, 10/01/01.

CGE&Y's Verification of Resolution statements for AZIWO1045-1 inappropriately reduce the three-step process to the one step of "CGE&Y identifies problem." Rather than verify that Qwest has fixed the problem, CGE&Y believes that simply identifying the problem and warning CLECs is sufficient. This response is antithetical to the notion of a military style test.

Evidence of CGE&Y lowering the bar for closing IWO's also exists in it Verification of Resolution statements in AZIWO1147. AZIWO1147 concerned the timeliness of Qwest's Help Desk answering Pseudo-CLEC telephone calls. In closing this IWO, CGE&Y stated:

CGE&Y is satisfied that this observation was brought to light as many other CLECs may have experienced the same type of service. Since there is no way to recreate this situation, the fact that it is documented, was brought to Qwest's attention and discussed is adequate.²⁹

Once again, CGE&Y believes that IWOs can be closed because parties are aware of the problem – not because the problem has been solved.

The failure to conduct CLEC interviews results in an overall lack balance in the Report. One cannot compare the CLEC questionnaire responses with the numerous Qwest interviews of Qwest personnel and hope to reach meaningful conclusions. One cannot ignore evidence provided by the Pseudo-CLEC in the form of reports and hope to reach meaningful conclusions.³⁰ Therefore, the results of the *Final Report Relationship Management Evaluation* are suspect.

²⁹ *Id.*

³⁰ This is all the more disturbing because the workshops were postponed to permit CGE&Y to incorporate and analyze the Pseudo-CLEC reports.

Respectfully submitted this 6th day of November, 2001.

**AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.
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