

ORIGINAL



0000023361

RECEIVED

2001 OCT 29 P 4: 20

AZ CORP COMMISSION
DOCUMENT CONTROL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

**LEWIS
AND
ROCA**
LAWYERS

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman

JAMES M. IRVIN
Commissioner

MARC SPITZER
Commissioner

Arizona Corporation Commission

DOCKETED

OCT 29 2001

DOCKETED BY *msc*

**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

**COMMENTS OF WORLDCOM, INC. REGARDING STAFF'S PROPOSED REPORT ON
QWEST'S COMPLIANCE WITH CHECKLIST ITEM 2 REGARDING ACCESS TO
UNBUNDLED NETWORK ELEMENTS**

WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits these comments to Staff's Proposed Report on Qwest Corporation's ("Qwest") Compliance with Checklist Item No. 2, regarding access to unbundled network elements ("UNEs"). WorldCom concurs in the comments filed by AT&T Communications of the Mountain States, Inc., and TCG

1 Phoenix (collectively, "AT&T") concerning this proposed report. In addition, WorldCom will
2 make some additional comments on the Change Management Process ("CMP").and on issues
3 concerning Qwest's stand-alone test environment ("SATE").
4

5 CHANGE MANAGEMENT PROCESS

6 **Paragraph 38:** WorldCom considers it premature to suggest that the redesign of the
7 change management process ("CMP") will be completed in late November 2001. Also in this
8 paragraph, Staff notes that Qwest filed its first status report concerning the redesign effort that is
9 taking place with respect to the change management process ("CMP"). Staff's proposed report
10 should reflect that responses were filed to the Qwest status report that generally reflect that much
11 work remains to be done, particularly concerning changes to products and processes.
12

13 Competitive local exchange carriers ("CLECs") consider the redesign process to be a
14 complete overhaul of the original CMP. Qwest seems to take the position that CMP redesign is
15 intended to enhance its current process. This issue has been debated at length at the redesign
16 sessions. The forum has chosen to develop a CMP that meets industry guidelines, using the
17 Ordering and Billing Forum ("OBF") guidelines as a starting point. The redesign sessions have
18 been conducted in a manner to allow parties the ability to negotiate what the entire CMP will be
19 going forward. Thus, processes in place today will most likely be modified upon discussion. As
20 noted in both Qwest's status report and WorldCom's response, draft interim processes are
21 gradually being developed. However, until the entire CMP redesign effort is completed and
22 CLECs have had the opportunity to consider CMP, as it is redesigned, it is difficult to predict
23 whether interim processes will become final processes.
24
25
26

1 Finally, no real evidence has been taken by the Commission on CMP, either as originally
2 proposed or as contemplated in the redesign process. If Qwest and the CLECs do not reach
3 complete agreement, the taking of further evidence may be necessary concerning any impasse
4 issues.

5
6 A. **DISPUTED ISSUE NO. 1a: Whether Qwest will provide a Stand-Alone
Testing Environment by July 31, 2001? (SGAT § 12. 2.9.3.2; CL2-1a)**

7 WorldCom agrees with Staff in its recommendation that checklist item #2 has not been
8 met due to the lack of evidence that Qwest's SATE is stable and mirrors production as required by
9 the FCC.

10
11 B. **DISPUTED ISSUE NO. 1e: Qwest opposition to some of AT&T's other
proposed revisions to the SGAT (SGAT § 12. 2.9.3.1 to 12.2.9.3.4; CL2-1e).**

12
13 WorldCom believes there are two issues identified here: First, will Qwest make available a
14 test bed (SATE) prior to new releases so that CLECs are provided an opportunity to implement
15 the latest software upon Qwest implementation? WorldCom is willing to support the availability
16 of SATE for testing at least 30 days prior to the actual release date.

17 Second, how far in advance of the release of SATE or IMA versioning will Qwest provide
18 the necessary documentation such that CLECs can adequately prepare systems and staff for the
19 changes? The following language from OBF 2233a3 is under review by the CMP Redesign
20 Team:

21

22 Notification for customer impacting releases, which may include customer initiated
23 requests, provider initiated requests and regulatory changes, will typically occur at
24 least 73 calendar days prior to implementing the release. This notification may
25 include draft business rules. Customers have fifteen (15) calendar days from the
26 initial publication of draft documentation to provide comments / questions on the
documentation.

Technical specifications will be produced and distributed to customers 66 calendar
days prior to implementation.

1 Final business rules and technical specifications for the release will be published at
2 least 45 calendar days prior to implementation.

3 For customer impacting releases, more or less notification may be provided based
4 on severity and the impact of the changes in the release. For example, the provider
5 can implement the change in less than 45 calendar days with customer
6 concurrence.

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

C. **DISPUTED ISSUE NO. 1c: Whether Qwest will negotiate with CLECs, on a case-by-case basis, to provide comprehensive production testing? (CL2-1c)**

Staff refers to IMA versioning but should note that IMA software does not support versioning. It is Qwest's up-front editing or business processing layers that determine whether a wholesale order can be processed or not. IMA software enhancements provide for new versions but each time an individual logs on to IMA, he or she is accessing the latest version available. On the other hand, versioning will occur on those systems that support local orders which include Qwest's back end systems. Thus, WorldCom agrees with Staff in that language needs to be developed in the SGAT or an exhibit to the SGAT to address the availability of the SATE, pre-production notification to CLECs of any new versioning releases, and the terms and conditions for comprehensive production testing.

D. **DISPUTED ISSUE NO. 1d: Whether AT&T's proposed SGAT terms concerning comprehensive production testing are appropriate and should not be included in the SGAT? (SGAT § 12. 2.9.3.5; CL2-1d)**

WorldCom concurs with Staff that language is needed that clearly spells out Qwest's obligation to provide such testing.

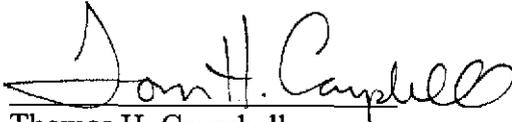
E. **DISPUTED ISSUE NO. 1e: Qwest opposition to some of AT&T's other proposed revisions to the SGAT (SGAT § 12. 2.9.3.1 to 12.2.9.3.4; CL2-1e)**

WorldCom agrees with Staff that the Commission should wait to finalize language upon validation that SATE is stable and mirrors production.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Respectfully submitted this 29th day of October, 2001.

LEWIS AND ROCA LLP



Thomas H. Campbell
40 N. Central Avenue
Phoenix, Arizona 85007
(602) 262-5723

- AND -

Thomas F. Dixon
707 -17th Street, #3900
Denver, Colorado 80202
(303) 390-6206

Attorneys for WorldCom, Inc.

ORIGINAL and ten (10)
copies of the foregoing filed
this 29th day of October, 2001,
with:

Arizona Corporation Commission
Docket Control - Utilities Division
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand-
delivered this 29th day of October,
2001, to:

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Jane Rodda, Administrative Law Judge
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

LEWIS
AND
ROCA
LLP
LAWYERS

1 Steve Olea, Acting Director
Utilities Division
2 Arizona Corporation Commission
1200 W. Washington Street
3 Phoenix, Arizona 85007

4 COPY of the foregoing mailed
5 this 29th day of October, 2001, to:

6 Lyndon J. Godfrey
Vice President – Government Affairs
7 111 West Monroe
Suite 1201
8 Phoenix, Arizona 85003

9 Scott Wakefield
Residential Utility Consumer Office
10 2828 N. Central Avenue
Phoenix, Arizona 85004

11 Maureen Arnold
12 US West Communications, Inc.
3033 N. Third Street
13 Room 1010
Phoenix, Arizona 85012

14 Mark Dioguardi
15 Tiffany and Bosco PA
500 Dial Tower
16 1850 N. Central Avenue
Phoenix, Arizona 85004

17 Thomas L. Mumaw
18 Snell & Wilmer
One Arizona Center
19 Phoenix, Arizona 85004-0001

20 Andrew O. Isar
TRI
21 4312 92nd Avenue N.W.
Gig Harbor, Washington 98335

22 Darren S. Weingard
23 Stephen H. Kukta
Sprint Communications Co., L.P.
24 1850 Gateway Drive, 7th Floor
San Mateo, CA 94404-2467

25
26

LEWIS
AND
ROCA
LLP

LAWYERS

- 1 Timothy Berg
Fennemore, Craig, P.C.
2 3003 N. Central Avenue
Suite 2600
3 Phoenix, Arizona 85012-3913
- 4 Charles Steese
US West, Inc.
5 1801 California Street, Ste. 5100
Denver, Colorado 80202
- 6 Joan S. Burke
7 Osborn & Maledon
2929 N. Central Avenue
8 21st Floor
Phoenix, Arizona 85067-6379
- 9 Richard S. Wolters
10 AT&T & TCG
1875 Lawrence Street
11 Suite 1575
Denver, Colorado 80202
- 12 Michael M. Grant
13 Todd C. Wiley
Gallagher & Kennedy
14 2575 E. Camelback Road
Phoenix, AZ 85016-4240
- 15 Raymond S. Heyman
16 Michael Patten
Roshka Heyman & DeWulf
17 Two Arizona Center
400 Fifth Street
18 Suite 1000
Phoenix, Arizona 85004
- 19 Diane Bacon, Legislative Director
20 Communications Workers of America
5818 North 7th Street
21 Suite 206
Phoenix, Arizona 85014-5811
- 22 Charles Kallenback
23 ACSI
131 National Business Parkway
24 Annapolis Junction, Maryland 20701

25
26

LEWIS
AND
ROCA
LLP
LAWYERS

- 1 Bradley Carroll, Esq.
Cox Arizona Telcom, L.L.C.
2 1550 West Deer Valley Road
Phoenix, Arizona 85027
3
- 4 Joyce Hundley
United States Department of Justice Antitrust Division
1401 H Street, N.W.
5 Suite 8000
Washington, D.C. 20530
6
- 7 Daniel Waggoner
Davis Wright Tremaine
2600 Century Square
8 15011 Fourth Avenue
Seattle, Washington 98101-1688
9
- 10 Alaine Miller
NextLink Communications, Inc.
500 108th Avenue NE, Suite 2200
11 Bellevue, Washington 98004
- 12 Mark N. Rogers
Excell Agent Services, LLC
13 2175 W. 14th Street
Tempe, Arizona 85281
14
- 15 Traci Grundon
Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue
16 Portland, Oregon 97201
- 17 Mark P. Trincherro
Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue, Suite 2300
18 Portland, Oregon 97201
19
- 20 Gena Doyscher
Global Crossing Local Services, Inc.
1221 Nicollet Mall
21 Minneapolis, Minnesota 55403-2420
- 22 Penny Bewick
New Edge Networks, Inc.
23 P.O. Box 5159
Vancouver, WA 98668
24
25
26

LEWIS
AND
ROCA
LLP
LAWYERS

1 Jon Loehman
2 Managing Director-Regulatory
3 SBC Telecom, Inc.
4 5800 Northwest Parkway
5 Suite 135, Room I.S. 40
6 San Antonio, TX 78249

7 M. Andrew Andrade
8 5261 S. Quebec St., Ste. 150
9 Greenwood Village, CO 80111

10 Douglas Hsiao
11 Rhythms Links Inc.
12 9100 E. Mineral Circle
13 Englewood, CO 80112

14 Karen Clauson
15 Eschelon Telecom, Inc.
16 730 2nd Avenue South
17 Suite 1200
18 Minneapolis MN 55402

19 Brian Thomas
20 Vice President Regulatory – West
21 Time Warner Telecom, Inc.
22 520 S.W. 6th Ave., Ste. 300
23 Portland, Oregon 97204

24 Andrea P. Harris
25 Senior Manager, Regulatory
26 Allegiance Telecom, Inc. of Arizona
2101 Webster, Suite 1580
Oakland, CA 94612

18
19
20
21
22
23
24
25
26

Beth J. Griffin