

ORIGINAL



0000023369

RECEIVED

2001 NOV 16 P 4:30

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**
LLP
LAWYERS

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman

JAMES M. IRVIN
Commissioner

MARC SPITZER
Commissioner

Arizona Corporation Commission
DOCKETED

NOV 16 2001

DOCKETED BY

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

**POST-WORKSHOP BRIEF OF AT&T AND WORLDCOM ON
THE FINAL REPORT CAPACITY TEST**

WorldCom, Inc., on behalf its regulated subsidiaries, (collectively "WorldCom") and AT&T Communications of the Mountain States, Inc. and TCG Phoenix, (collectively "AT&T") submits this Post-Workshop Brief regarding the Final Report Capacity Test, Version 1, dated October 1, 2001. WorldCom concurs in the comments filed by AT&T regarding how the Capacity Test was conducted that were filed prior to the Capacity Test

1 Workshop held on October 25 and 26, 2001. The parties will not repeat those comments,
2 but incorporate those comments here as if fully stated.

3 INTRODUCTION

4
5 Cap Gemini Ernst & Young ("CGE&Y") was directed to evaluate Qwest
6 Corporation's ("Qwest") operations support system ("OSS") in the Capacity Test. The
7 Arizona Technical Advisory Group ("TAG") established a capacity test plan.¹ The
8 Capacity Test was designed to provide information which the Arizona Corporation
9 Commission could use to assess the capability of Qwest's OSS to handle loads equal to or
10 greater than those projected by the various competitive local exchange carrier ("CLEC")
11 participants for estimated volumes projected one year from the date of the running of the
12 Capacity Test. These volumes were to be determined by CGE&Y using projected
13 volumes provided by both Qwest and the CLECs. The test also included a review of
14 procedures associated with computer systems scalability and staff scalability to determine,
15 under stated assumptions, whether Qwest's systems, operations and processes were
16 predictably capable of handling CLEC loads in the future, both projected and unexpected²
17 as required by the Federal Communications Commission ("FCC").
18
19
20
21
22

23 ¹See, Section 6 of the Master Plan for Testing Qwest's Operations Support Systems in Arizona, Version 4.2, dated
24 June 29, 2001, and Section 5 of the Cap Gemini Telecommunications 271 Test Standards, Version 2.9, dated June 29,
2001.

25 ²See, Executive Overview of the Master Plan for Testing Qwest's Operations Support Systems in Arizona, Version
26 4.2, dated June 29, 2001, description of Capacity Test.

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

COMMENTS

A. **CGE&Y did not properly track Operational Readiness Test (“ORT”) Results.**

In at the Arizona Capacity Test Workshop, it was determined that CGE&Y did not track the results of the five ORTs performed in order to validate that all issues identified were resolved. Although many issues were identified as reported in section 4.1.3 of the final report (Incorrect test scripts created by CGE&Y; Incorrect templates created by the Pseudo-CLEC; Incorrect test bed setup by Qwest, and Inconsistent reporting of times) CGE&Y did not track these issues for each ORT. In accordance with the System Capacity Test Detail Plan, “The overall objective of the operational readiness test is to verify that all of the components of the System Capacity Test are in place and working in a sufficient manner to enable the test to proceed after evaluation of the results of the operational readiness test”. Without tracking the results of these issues for each ORT, CGE&Y could not properly validate that any of these issues were, in fact, resolved.

CGE&Y failed to evaluate the results of the ORT to establish the performance results of executing the tests. The critical facts of pre-order transaction response time and the interval within which Qwest returned Firm Order Confirmations (“FOC”) for the test orders were not evaluated. Such an evaluation would have enabled CGE&Y to compare the results of the ORT with the results of the system capacity test. A comparison would *demonstrate consistency of results between the separate tests - a logical application of test integrity*. Instead CGE&Y did nothing. In response to a question posed by Mr. Connolly on behalf of AT&T at the workshop CGE&Y stated:

1 “What did you conclude to be the reasons that there are differences in the response
2 time between the ORT and the Capacity Test?”

3 “*We didn’t conclude anything.*”³

4
5 AT&T Exhibits 3-7 and 3-8 show that the Pseudo-CLEC enjoyed significantly
6 faster response time and significantly shortened FOC intervals during the Capacity Test
7 than were experienced in the ORT, and CGE&Y could not explain any reason that
8 Qwest’s systems performed better under increased transaction loads. Had CGE&Y
9 conducted the ORT test results analysis required in accordance with the Test Standards
10 Document Cap Gemini Telecommunications 271 Test Standards, Version 2.9, dated June
11 29, 2001⁴, the unexplained and incredible improvement in results may have been resolved.
12
13 At best, the capacity test response time and FOC interval results are unconvincing.

14
15 **B. CGE&Y’s Analysis Demonstrated that Qwest’s Calculation of PO-1**
16 **Results is Non-Compliant With the PO-1 PID and Stress Volumes**
17 **Yielded Excessive Response Times for CLECs**

18 CGE&Y was directed by the TAG to analyze Qwest’s Interconnect Mediated
19 Access Response Time Measurement (“IRTM”) tool. CGE&Y stated:

20 An integral part of the Capacity Test is to collect actual response times
21 experienced by the Pseudo-CLEC in order to compare results to those
22 reported by Qwest during the Capacity Test using IRTM. This data will
23 be utilized to facilitate a decision as to whether results generated from
24 Qwest’s simulated system is [sic] a true representation of pre-order
25 transaction response times experienced by CLEC service representatives.⁵

26 ³ See, October 25, 2001, Transcript, at page 197, Lines 9 through 13.

⁴ See, Cap Gemini Telecommunications 271 Test Standards, Version 2.9, dated June 29, 2001.

⁵ Final Report Capacity Test, October 1, 2001, Version 1.0, p. 6.

1 According to Qwest, the IRTM purportedly simulates pre-order response times and
2 can be utilized as the means to determine whether Qwest is complying with the
3 performance measurement standard, PO-1 (pre-order/order response times). In order to
4 confirm Qwest's assertions, CGE&Y was required to determine if the actual Pseudo-
5 CLEC pre-order/order response times provided similar results utilizing the planned
6 volumes for the Capacity/Stress Tests.
7

8 As an initial matter, IRTM results were captured and provided by Qwest. However,
9 CGE&Y did not validate the results or the process employed to gather the results. As
10 defined in the PID, one of the PO-1A and PO-1B exclusions are queries that timeout.⁶
11 After CGE&Y's analysis of the results obtained from the Pseudo-CLEC and Qwest during
12 the capacity test, CGE&Y determined that IRTM was designed to exclude transactions
13 that exceeded 200 seconds in length whether or not the query actually timed out.⁷ During
14 the workshop, Qwest admitted that transactions that received a valid response longer than
15 200 seconds would be excluded from the IRTM results because the transactions were
16 considered to be timed out.⁸ Valid transaction responses with response times greater than
17 200 seconds are not truly transactions that have timed out. For Qwest to exclude these
18 valid transactions as transactions that time-out is non-compliant with the PO-1 PID.
19
20
21
22

23
24 ⁶ Qwest Service Performance Indicator Definitions, Arizona Working PID Version 6.3, May 1, 2001, p. 7

25 ⁷ Final Report Capacity Test, October 1, 2001, Version 1.0, pp. 41 – 42.

26 ⁸ See, October 25, 2001, Transcript at pp. 142, 143 and 145.

1 CGE&Y should have generated an IWO to reflect Qwest's non-compliant measurement of
2 the PO-1A and PO-1B results, but chose not to do so.

3 Regardless of Qwest's inappropriate use of the 200-second exclusion, CGE&Y
4 determined that under stress conditions (above 150% peak load), a CLEC would
5 experience excessive response times. In addition, during the third hour of the stress test,
6 CGE&Y determined that an IRTM outage occurred. However, instead of re-running the
7 test, CGE&Y chose to exclude the transactions for both IRTM and the Pseudo-CLEC
8 results. This process eliminated CGE&Y's ability to accurately reflect what would have
9 happened had the test been re-run and the actual results been included in the evaluation.
10 Obviously, excessive pre-order response times could have a dramatic effect on a CLEC's
11 ability to compete in the market.
12
13

14
15 **CONCLUSION**

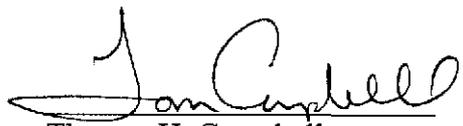
16 For the reasons stated, WorldCom and AT&T request that the Commission find that
17 Qwest did not pass the Capacity Test requirements and direct CGE&Y to conduct a retest
18 of the capacity test to address the concerns discussed above.
19

20 The undersigned is authorized to sign and filed this brief on behalf of AT&T.
21
22
23
24
25
26

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 16th day of November, 2001.

LEWIS AND ROCA LLP



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

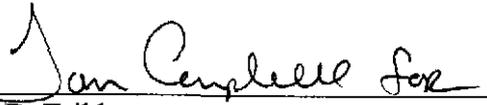
- AND -

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

Attorneys for WorldCom, Inc.

- AND -

Attorneys for AT&T Communications of the
Mountain States, Inc. and
TCG Phoenix

By: 

Mary B. Tribby
Richard S. Wolters
1875 Lawrence Street
Suite 1575
Denver, Colorado 80101
Telephone: (303) 298-6741

ORIGINAL and ten (10)
copies of the foregoing filed
this 16th day of November, 2001,
with:

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

LEWIS
AND
ROCA
LLP
LAWYERS

1 COPY of the foregoing hand-
2 delivered this 16th day of November, 2001,
3 to:

3 Maureen Scott
4 Legal Division
5 Arizona Corporation Commission
6 1200 W. Washington Street
7 Phoenix, Arizona 85007

6 Jane Rodda, Administrative Law Judge
7 Arizona Corporation Commission
8 1200 W. Washington Street
9 Phoenix, Arizona 85007
10 Ernest Johnson, Director
11 Utilities Division
12 Arizona Corporation Commission
13 1200 W. Washington Street
14 Phoenix, Arizona 85007

11 COPY of the foregoing mailed
12 this 16th day of November, 2001, to:

13 Lyndon J. Godfrey
14 Vice President – Government Affairs
15 AT&T Communications of the
16 Mountain States
17 111 West Monroe, Suite 1201
18 Phoenix, Arizona 85003

16 Scott Wakefield
17 Residential Utility Consumer Office
18 2828 N. Central Avenue
19 Phoenix, Arizona 85004

19 Maureen Arnold
20 US West Communications, Inc.
21 3033 N. Third Street
22 Room 1010
23 Phoenix, Arizona 85012

22 Jeffrey W. Crockett
23 Snell & Wilmer
24 One Arizona Center
25 Phoenix, Arizona 85004-0001
26

LEWIS
AND
ROCA
LLP
LAWYERS

1 Richard P. Kolb
Vice President – Regulatory Affairs
2 OnePoint Communications
Two Conway Park
3 150 Field Drive, Suite 300
Lake Forest, Illinois 60045

4 Andrew O. Isar
5 TRI
4312 92nd Avenue N.W.
6 Gig Harbor, Washington 98335

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

10 Timothy Berg
Fennemore, Craig, P.C.
11 3003 N. Central Avenue
Suite 2600
12 Phoenix, Arizona 85012-3913

13 Charles Steese
Qwest
14 1801 California Street, Ste. 5100
Denver, Colorado 80202

15 Joan S. Burke
16 Osborn & Maledon
2929 N. Central Avenue
17 21st Floor
Phoenix, Arizona 85067-6379

18 Richard S. Wolters
19 AT&T & TCG
1875 Lawrence Street
20 Suite 1575
Denver, Colorado 80202

21 Michael M. Grant
22 Todd C. Wiley
Gallagher & Kennedy
23 2575 E. Camelback Road
Phoenix, AZ 85016-4240

24
25
26

LEWIS
AND
ROCA
LLP
LAWYERS

- 1 Raymond S. Heyman
Michael Patten
- 2 Roshka Heyman & DeWulf
Two Arizona Center
- 3 400 Fifth Street
Suite 1000
- 4 Phoenix, Arizona 85004
- 5 Diane Bacon, Legislative Director
Communications Workers of America
- 6 5818 North 7th Street
Suite 206
- 7 Phoenix, Arizona 85014-5811
- 8 Bradley Carroll, Esq.
Cox Arizona Telcom, L.L.C.
- 9 1550 West Deer Valley Road
Phoenix, Arizona 85027
- 10 Joyce Hundley
United States Department of Justice Antitrust Division
- 11 1401 H Street, N.W.
Suite 8000
- 12 Washington, D.C. 20530
- 13 Daniel Waggoner
Davis Wright Tremaine
- 14 2600 Century Square
15011 Fourth Avenue
- 15 Seattle, Washington 98101-1688
- 16 Alaine Miller
NextLink Communications, Inc.
- 17 500 108th Avenue NE, Suite 2200
18 Bellevue, Washington 98004
- 19 Mark N. Rogers
Excell Agent Services, LLC
- 20 2175 W. 14th Street
Tempe, Arizona 85281
- 21 Traci Grundon
Davis Wright Tremaine LLP
- 22 1300 S.W. Fifth Avenue
23 Portland, Oregon 97201
- 24 Mark P. Trincherro
Davis Wright Tremaine LLP
- 25 1300 S.W. Fifth Avenue, Suite 2300
26 Portland, Oregon 97201

LEWIS
AND
ROCA
LLP

LAWYERS

1 Gena Doyscher
Global Crossing Local Services, Inc.
2 1221 Nicollet Mall
Minneapolis, Minnesota 55403-2420

3 Penny Bewick
4 New Edge Networks, Inc.
P.O. Box 5159
5 Vancouver, WA 98668

6 Jon Loehman
Managing Director-Regulatory
7 SBC Telecom, Inc.
5800 Northwest Parkway
8 Suite 135, Room I.S. 40
San Antonio, TX 78249

9 M. Andrew Andrade
10 5261 S. Quebec Street
Suite 150
11 Greenwood Village, CO 80111

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

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

17 Brian Thomas
18 Vice President Regulatory – West
Time Warner Telecom, Inc.
19 520 S.W. 6th Avenue
Suite 300
20 Portland, Oregon 97204

21 Andrea P. Harris
Senior Manager, Regulatory
22 Allegiance Telecom, Inc. of Arizona
2101 Webster, Suite 1580
23 Oakland, CA 94612

24

25 
26