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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 BRIEF ON
FUNCTIONALITY TEST
SUMMARY REPORT

AT&T Communications of the Mountain States, Inc. and TCG Phoenix, (collectively, "AT&T") hereby file their Brief on Cap Gemini Ernst & Young's ("CGE&Y") Functionality Test Summary Report for 271 Test Generator, version 2.0, dated October 10, 2001.

I. INTRODUCTION

CGE&Y was retained and directed to evaluate Qwest Corporation's ("Qwest") operations support systems ("OSS") according to the requirements spelled out in the Master Test Plan ("MTP")¹ and the Test Standards Document ("TSD").² The Functionality Test is to provide information to the Arizona Corporation Commission ("ACC") to determine if the Qwest OSS adequately perform pre-ordering, ordering, provisioning, maintenance and repair, and billing

¹ Master Test Plan for Testing Qwest's Operations Support System in Arizona, version 4.2, dated June 29, 2001.

² Cap Gemini Telecommunications 271 Test Standards, version 2.10, dated September 6, 2001.

functions for the competitive local exchange carriers ("CLECs").³ Two major areas of focus are detailed in the MTP and in the TSD:

Verify the ability of the CLEC participants or the Pseudo-CLEC to perform the necessary pre-order activities, to submit LSRs and ASRs through Qwest's OSS which must successfully provision and install the requested service or facilities (ASRs will not be provisioned) in an accurate and timely fashion. This includes the ability to track the progress of the LSRs and ASRs through these systems, install the service or facility, observe final order completion, verify the establishment of billing records, and verify the accuracy of call records against documented test calls.⁴

Validate the ability of a CLEC participant to access Maintenance and Repair (M&R) systems using EB-TA. Additionally, the Pseudo-CLEC will access M&R systems using the Qwest CEMR system.⁵

Both controlling documents specify, in detail, testing requirements for the five functional areas of OSS support which were to be conducted by CGE&Y and reported in the Functionality Test Report. The Functionality Test workshops yielded significant facts that AT&T presents herein which reveal that CGE&Y failed to conduct all of the tests and analyses of the Functionality Test that were required and that CGE&Y has come to conclusions in its Functionality Test Report that are not supported with facts sufficient to support the findings.

In the Functionality Test workshops, CGE&Y reminded the parties that its Report is merely advisory in nature and that the conclusions it reaches are ones that are not necessarily relevant to the Commission's conclusion on whether Qwest provides non-discriminatory access to its OSS.⁶ AT&T elicited this testimony due, in part, to its concerns over claims that CGE&Y makes in its Report regarding positive conclusions about the OSS access provided by Qwest. AT&T believes it is premature for CGE&Y to conclude there is parity of access while the test

³ TSD, § 3.1.

⁴ TSD, § 3.1. *See also*, MTP, § 4.1.

⁵ *Id.*

⁶ TR 30 (Nov. 27, 2001).

continues with re-testing and Incident Work Orders (“IWO”) remain unresolved. It is counter-productive, if not counter-intuitive, to publish a report on the Functionality Test that contains outlandish claims before all testing is complete and that cannot be proven to be true by CGE&Y’s own work products.

II. CGE&Y DID NOT PERFORM TESTS THAT THE MTP AND TSD REQUIRE

AT&T’s earlier submitted comments on the Functionality Test report pointed out discrepancies between the testing that was to be conducted and the testing actually performed by CGE&Y. During the workshops, AT&T’s questions endeavored to determine the omissions in testing versus the omissions in reporting. To AT&T’s disappointment, it found case after case where, despite a clear requirement to conduct certain tests and report on them, or to analyze test results and issue reports on those results, or to publish information about its testing, CGE&Y ignored the controlling documents and makes no finding because it conducted no analyses or testing.⁷

1. **CGE&Y does not provide an evaluation of Qwest’s pre-ordering system contrasted with the response times measured in PO-1, despite the requirement to do so.**

In the March 29 TAG meeting, the parties agreed that in the Functionality Test, CGE&Y would obtain information from the actual use of Qwest’s pre-ordering system to determine whether the Qwest IRTM system accurately portrays the results that a CLEC would experience

⁷ CGE&Y typically responded to AT&T’s inquiries that a requested test or analysis is “out of scope” of the Functionality Test. Apparently, whenever CGE&Y did not want to do any part of the Functionality Test (or the Retail Parity Evaluation, the Relationship Management Evaluation or Capacity Test), for whatever reason, CGE&Y unilaterally ignored the requirements of the MTP or TSD. It did not propose and obtain TAG agreement to changes to the language of the MTP or TSD to justify its inaction, ignoring the provisions within MTP § 2.2.4 to seek modification of the testing requirements.

in terms of response time. PO-1 is the measurement that provides pre-order response time analysis against specific benchmarks for various pre-ordering types.

CGE&Y provides its analysis of the pre-ordering response times as experienced by the pseudo-CLEC in Table 2.1.4a in its Functionality Test Report. CGE&Y provides this data “for informational purposes,” however, and demurs from the important question whether PO-1 measured results are equivalent to those that a CLEC user of the system would experience. It infers that its Capacity Test Report is dispositive of the question of comparability. The Capacity Test Report makes no such finding, noting only that CGE&Y believes that the testing of pre-ordering system capacity shows that Qwest can meet its benchmarks.

The ACC needs to know the answer to the IRTM versus actual usage question, and CGE&Y has failed to provide any supportable data that can answer the question. On the basis of Table 2.1.4a, Qwest has missed more than 90% of its EDI Pre-Ordering benchmarks in the course of the Functionality Test.

2. CGE&Y has not evaluated Qwest’s EDI interfaces for integration quality despite the MTP/TSD requirement to do so.

The MTP and TSD clearly require CGE&Y to conduct sufficient testing and evaluation to render an opinion on the extent to which pre-ordering information can be integrated with CLEC service requests. “The integration quality of pre-order and order data will also be evaluated during the functionality tests.”⁸ The CGE&Y Functionality Test Report is silent on the issue of pre-order to order integration. CGE&Y responded to AT&T questions during the workshop indicating that it evaluated Qwest’s IMA-GUI for integration quality, but did not evaluate the EDI interface for such considerations. CGE&Y indicated that it is conducting an evaluation of Qwest’s EDI interface for integrateability, but does not now have an opinion.

⁸ MTP, § 4.1; TSD, § 3.1.

CGE&Y has failed to provide its written opinion and provides no empirical data that supports its limited finding offered in testimony during the workshop.

The ability of a CLEC to integrate data from Qwest pre-order responses into an LSR without having to translate or transform the data is critical to a CLEC using electronic interfaces, *i.e.*, EDI. When ordering requirements specify data to be entered in a certain way, the pre-ordering information should be formatted in the same way so that the CLEC's system can guide the *pre-order information into the order without manual intervention*. Qwest's retail ordering system is highly integrated, as was demonstrated during the course of the Retail Parity Evaluation. The reason for making the testing requirements a part of the Functionality Test was to ensure that the Pseudo-CLEC operated the pre-ordering and ordering interfaces sufficiently to enable CGE&Y to form an opinion by witnessing the ways in which pre-order and order information could be linked between the two systems.

3. CGE&Y failed to conduct Billing tests required by the TSD and the MTP

CGE&Y performed an incomplete evaluation of the Daily Usage Files ("DUF") that provide the details of calls made by the Friendlies on the lines established by the Pseudo-CLEC. CGE&Y did not evaluate the form, format and content of Qwest's DUF against Qwest's specifications to determine whether Qwest's systems conform to the documented specifications for DUF transactions.⁹ As a result, there are no findings as to whether a CLEC can rely on Qwest's documentation to develop and implement a system to validate DUF provisioning by Qwest.

CGE&Y ignored the TSD requirement to validate Qwest's provisioning of call details that enable CLECs to bill interexchange carriers ("IXCs") for terminating calls on their

⁹ CGE&Y Ex. 4-7, Q/A178; TR 305 (Nov. 28, 2001).

networks. TSD Section 3.8.3 provides a list of eight specific billing test activities. Item (h) provides: "Support of CLEC to IXC Billing: Testing will be done to evaluate Qwest's production of originating interLATA call records to be used by the Pseudo-CLEC for IXC access billing." This testing did not commence at the beginning of the Functionality Test.¹⁰

The Pseudo-CLEC inexplicably began to receive these records in August 2001, more than eight months after testing began, and the Pseudo-CLEC was advised by CGE&Y not to process these records into a format that CGE&Y could use to verify that the records reflected the Friendlies' end-user calls to 1-800 numbers or other services.¹¹ CGE&Y's evaluation of the Friendlies' end-user calls is incomplete, as there was no attempt made by CGE&Y to examine the Access DUF ("ADUF") records to be certain that the end user, call-generated ADUF records have sufficient information to enable the CLEC to bill an IXC for the access charges. Furthermore, CGE&Y has no answers to the questions why the ADUF records did not appear until August 2001, why they mysteriously began to appear, or whether they are accurate or complete.

4. **The CGE&Y Report under-reports provisioning errors made by Qwest in the implementation of pseudo-CLEC Local Service Requests**

The CGE&Y Functionality Test report identifies four service implementations that were incorrectly performed resulting in additional trouble reports issued to Qwest to correct its mistakes. During AT&T's questioning during the Functionality Test workshop, CGE&Y admitted that it failed to account for service provisioning errors detected in service validation

¹⁰ TR 296 (Nov. 28, 2001).

¹¹ TR 296 (Nov. 28, 2001).

testing;¹² following provisioning of unbundled loops;¹³ and following UNE-P to UNE- Loop conversions.¹⁴

CGE&Y's response to AT&T's questions on the omitted trouble tickets was that it would review its testing records, identify the mis-provisioned services and provide corrected statistics in its next version of the Functionality Test Report.

III. CGE&Y FAILED TO MAINTAIN DAILY LOGS

The TSD document provides specific reporting requirements for the TA, or GCE&Y.

The TA daily report will be updated at the end of each workday. It will include information from the daily log (Appendix D) regarding observations made during that day. The daily log will consist of the following fields:

- a) TA Tracking Number
- b) Purchase Order Number (PON)
- c) Process Area (Functionality)
- d) Process Sub-Area (e.g. UNE-P Residence)
- e) Transaction Media
- f) Date Submitted
- g) Date Completed
- h) Pending Status
- i) FOC Received Date
- j) SOC Received Date
- k) Expectations Met/Missed
- l) Comments

The specifications are defined in the following sections.¹⁵

One of the entrance criteria of the pre-order phase of the Functionality Test was daily logs were to be set up to document observations.¹⁶ Pre-order activities included "Retrieve test scripts scheduled for execution each day and enter on daily tracking logs."¹⁷ The TA was also

¹² TR 189-192 (Nov. 28, 2001); CGE&Y Ex. 4-4, Q/A63.

¹³ TR 237 (Nov. 28, 2001); CGE&Y Ex. 4-5, Q/A127.

¹⁴ TR 242 (Nov. 28, 2001).

¹⁵ TSD, § 3.7.1. *See also*, TSD, § 3.7.4.2(d): "The daily pre-ordering responsibilities of the TA consist of: ... (d) Providing test script results for input into the daily tracking log."

¹⁶ TSD, § 3.7.4.3(b)(6).

¹⁷ *Id.*, § 3.7.4.4(a).

supposed to “Collect completed test scripts from the Pseudo-CLEC and enter results on the daily tracking log.”¹⁸ Finally, the pre-order criteria specifically require validation that “All daily logs have been completed.”¹⁹ Similar requirements are reflected in the other portions of the Functionality Test.

AT&T began requesting copies of the daily logs shortly after the Functionality Test began. AT&T also attempted to obtain test data in a format conducive to data retrieval and analysis. It was not until the Functionality Test workshops that CGE&Y stunned the participants by confessing the inconceivable -- there were no daily logs.

CGE&Y met with CLECs, ACC Staff and the ACC’s consultants to define a process whereby CLECs would receive information about the progress being made in the Functionality Test *i.e.*, the Daily Test Logs. It was agreed that CGE&Y would provide records of each day’s Pre-ordering, Ordering, Provisioning, and Maintenance and Repair transactions on a weekly basis, two weeks after the end of each testing week. In the CLEC meeting in March 2001, AT&T outlined specific information that it required for its review of the Daily Test Logs. CGE&Y was instructed by ACC Staff to develop the Daily Test Logs according to AT&T’s requirements.²⁰ CGE&Y failed to implement the changes to reporting format despite the requests to make the changes and implement them. Follow-up calls to Staff proved ineffectual.

CGE&Y failed to deliver the CLEC Daily Test Log reports on time and failed to deliver the information about the testing that it agreed to provide. Rather than providing each day’s ordering transactions, CGE&Y provided the status of the last update to the LSR as of the end of the testing period being reported. This denied CLECs the requisite information to track the life

¹⁸ *Id.*, § 3.7.4.4(e).

¹⁹ *Id.*, § 3.7.4.5(e)

²⁰ It should be noted that, at no time, was CGE&Y relieved of any obligation to comply with the TSD requirements regarding the daily logs.

cycle of an LSR, as the intervening transactions, including supplements, rejection notices, confirmation notices, and status changes, were not provided. The pre-ordering transaction data were provided in early June only for the period of January 5 to May 16, 2001, and the information provided only enabled CLECs to examine the response time for the transactions and not the completeness, accuracy, or relationship of pre-order steps to order processing steps. CGE&Y provided repair and maintenance transactions information only for the period of May 15 to July 16, 2001, in the report provided to CLECs in early August. This data was also untimely and not formatted to enable CLEC detailed analysis of the results of maintenance and repair testing. CGE&Y reneged on its obligation to provide the Functionality Test records.

Receipt Date	Ordering Functionality Logs From Date	Through Date
April 19	March 12	March 22
April 22	March 24	April 6
May 8	April 7	April 20
May 21 (a)	December 21, 2000	March 10
May 25	April 21	May 5
July 26 (b)	May 6	June 2
	Pre-Ordering Logs	
June 4	January 5	May 16
	Maintenance and Repair Logs	
August 3	May 17	July 16

The failure to maintain the daily logs undermines the integrity of the entire Functionality Test. To keep this transgression a secret, for all intents and purposes, to the end of the Functionality Test seriously calls into question the credibility of the TA and any conclusions

reached by the TA. Strictly speaking, the exit criteria of the Functionality Test are not met if the daily logs are not complete. And, as spelled out in the Procedural Order, the Draft Final Report scheduled for December 21, 2001, cannot be released until all exit criteria are met.

IV. AT&T'S COMMENTS

AT&T has not reiterated the issues raised in its Comments on the Functionality Test Report. However, AT&T's Comments should not be disregarded and are incorporated herein by reference.

V. EXIT CRITERIA

AT&T has concerns that the Functionality Test Report reflects that a number of test exit criteria have been completed, yet footnotes in the Report indicate that no such conclusion should or can be drawn.²¹ AT&T is also concerned that the exit criteria for pre-ordering in the Report reflect that all daily logs have been completed²² when, in fact, CGE&Y has testified that there are no daily logs. CGE&Y also reaches conclusions prior to the closure of related IWOs. This is premature, to say the least. However, the TSD explicitly provides that the closure of all IWOs is an exit criterion of the Functionality Test.²³

AT&T must stress that all exit criteria must be met before the Draft Final Report is released. The exit criteria in the TSD are requirements, not "best efforts." The inability to meet an exit criterion must be brought to the TAG for discussion and resolution, prior to the release of the Draft Final Report.

²¹ Functionality Test Report, §§ 2.14 and 2.3.4.2.

²² TSD, § 2.1.4.

²³ See, for example, TSD, § 3.7.5.5(i).

VI. CONCLUSION

The Functionality Test Report was issued prematurely, even though it was only a draft. It reaches conclusions before all the required analyses and testing were conducted or performed, IWOs were closed and retesting was complete. This undermines the procedures contained in the MTP and TSD and inappropriately shifts the burden of proof to the CLECs. It also increases the amount of review and work on the Draft Final Report and adds to the number of issues to be addressed in the final workshops.

Respectfully submitted this 10th day of December, 2001.

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