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BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
CHAIRMAN
JAMES M. IRVIN
COMMISSIONER
WILLIAM A. MUNDELL
COMMISSIONER
JEFF HATCH-MILLER
COMMISSIONER
MIKE GLEASON
COMMISSIONER

Arizona Corporation Commission
DOCKETED

AUG 28 2003

DOCKETED BY 

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S COMPLIANCE
WITH SECTION 271 OF THE
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

DECISION NO. 66224

ORDER

Open Meeting
Thursday, August 21, 2003
Phoenix, Arizona

BY THE COMMISSION:

1. Having considered the entire record herein and being fully advised in the premises, the Arizona Corporation Commission ("Commission") finds, concludes, and orders that:

FINDINGS OF FACT

I. BACKGROUND

2. The Federal Telecommunications Act of 1996 ("1996 Act") added Section 271 to the Communications Act of 1934. The purpose of Section 271 is to specify those conditions that must be satisfied in order for the Federal Communications Commission ("FCC") to allow a Bell Operating Company ("BOC"), such as Qwest Corporation ("Qwest" or the "Company"), formerly known as U S WEST Communications, Inc. ("U S WEST")¹ to provide in-region, interLATA telecommunications services. The conditions described in Section 271 are intended to determine the extent to which local phone service is open to competition.

3. Prior to passage of the 1996 Act, the Modification of Final Judgment (MFJ) prohibited the Bell Operating Companies (BOCs) from entering certain lines of business, including the

¹ For purposes of this Order, all references to US WEST have been changed to Qwest.
271 ROO OSS

1 provision of interexchange telecommunications service.²

2 4. The prohibitions set forth in the MFJ were based upon the premise that, if allowed to
3 enter the long-distance market, the Bell Operating Companies could use their control of the local and
4 local exchange access markets to obtain an unfair advantage in the long distance market.³

5 5. The Telecommunications Act of 1996 provides a statutory framework designed to
6 benefit "all Americans" by opening every telecommunications market to competition.⁴ The new
7 framework, provided by the Act, presents the means for BOCs to more fully participate in the
8 telecommunications market than previously permitted them by the MFJ.

9 6. In recognition of the market dominance retained by BOCs in their respective regions,
10 Congress chose to carryover certain restrictions imposed on them by the MFJ into the
11 Telecommunications Act until such time that they opened their local markets to competition.⁵ One
12 such restriction incorporated into Section 271 of the Act expressly denies BOCs the right to enter the
13 in-region, interLATA market until certain conditions are met.⁶

14 7. In so doing Congress formally recognized that, because it would not be in a BOC's
15 immediate self-interest to open its local exchange market, it would be unlikely that competition
16 would develop expeditiously in the local exchange and exchange access markets. Consequently,
17 Congress offered the incumbent providers the right to seek long-distance entry as an incentive to
18 prompt BOCs to open their local markets to competition.

19 8. Congress further recognized that, until local markets are open, there is an unacceptable
20 danger that some parties may seek to use their market power to compete unfairly in the long distance

21 ² The Modification of Final Judgment arose from the settlement of the Department of Justice's antitrust suit against
22 AT&T. *United States v. American Telephone and Telegraph Co.*, 552 F. Supp. 131 (D.D.C. 1982), *aff'd sub nom*,
23 *Maryland v. United States*, 460 U.S. 1001 (1983) (MFJ or Consent Decree); see also *United States v. Western Elec.*
Co., Civil Action No. 82-0192 (D.D.C. Apr. 11, 1996) (vacating the MFJ).

24 ³ *United States v. American Telephone and Telegraph Co.*, 552 F. Supp. At 165.

25 ⁴ H.R. Conf. Report No 104458 at 1.

26 ⁵ See, e.g. 141 Cong. Rec. S8057 (1995) (statement of Sen. Dorgan):

27 The Bell Operating Companies are not now free to go out and compete with the long
28 distance companies because they have a monopoly in most places in local service. It is
not fair for the Bell operating companies to have a monopoly in local service, retain that
monopoly and get involved in competitive circumstances in long distance service.

29 ⁶ 47 U.S.C. § 271.

1 market. Accordingly, Section 271 allows a BOC to enter the in-region, interLATA market, and
2 thereby offer a comprehensive package of telecommunications services, only after it demonstrates,
3 among other things, compliance with the interconnection, unbundling, and resale obligations that are
4 designed to facilitate competition in the local market.

5 9. Section 271(b)(1) of the Act specifies that a Bell Operating Company, or any affiliate
6 of that Bell Operating Company, may provide interLATA services originating in any of its in-region
7 States if the Federal Communications Commission approves the application of a Bell Operating
8 Company for each State. However, Section 271 also requires the Federal Communications
9 Commission to make various findings before approving any such entry.

10 10. Section 271(d)(2)(B) of the Act requires the FCC to consult with State commissions
11 prior to granting any approval for such authority. However, because the Act does not prescribe any
12 standard for the consideration of a State commission's verification under section 271(d)(2)(B), the
13 Commission has discretion in each section 271 proceeding to determine the amount of weight to
14 accord the State commission's verification.⁷ The FCC has stated that where there is evidence that a
15 rigorous review was conducted at the State level with participation by all interested parties,
16 significant weight will be given to the State's findings.

17 11. On May 27, 1997 this Commission issued Decision No. 60218 establishing an
18 administrative process and procedural framework for use by U S West (now "Qwest") to submit
19 information associated with a Section 271 application. This action by the Commission in Decision
20 No. 60218 comports with roles and responsibilities conferred upon it by Section 271(d)(2)(B) of the
21 Telecommunications Act.

22 II. PROCEDURAL HISTORY

23 12. On February 8, 1999, Qwest filed with this Commission a Notice of Intent to File with
24 the FCC and Application for Verification of Section 271(c) Compliance ("Application"), and a
25

26 ⁷ *Bell Atlantic New York Order*, 15 FCC Rcd at 3962, para.20; *Application of Ameritech Michigan Pursuant to Section*
27 *271 of the Communications Act of 1934, as amended*, CC Docket No. 97-137, 12 FCC Rcd 20543, 20559-
28 60(1997)(*Ameritech Michigan Order*). As the D.C. Circuit has held, "[A]lthough the Commission must consult with
the state commissions, the statute does not require the Commission to give State Commissions' views any particular
weight." *SBC Communications v. FCC*, 138 F.3d at 416.

1 Motion for Immediate Implementation of a Procedural Order.

2 13. On February 16, 1999, AT&T Communications of the Mountain States, Inc.
3 ("AT&T"), GST Telecom, Inc. ("GST"), Sprint Communications Company, L.P. ("Sprint"), Electric
4 Lightwave, Inc. ("ELI"), MCI WorldCom, Inc., on behalf of its regulated subsidiaries ("MCIW"),
5 and e-spire Communications, Inc. ("e-spire") filed with this Commission a Motion to Reject Qwest's
6 Application and Response to Qwest's Motion.

7 14. On March 2, 1999, Qwest's February 8, 1999 Application was determined by this
8 Commission to be insufficient and not in compliance with Decision No. 60218. The February 8
9 Application was placed in abeyance pending supplementation with Qwest's Direct Testimony
10 ordered pursuant to Decision No. 60218 and a June 16, 1998 Procedural Order. On March 25, 1999,
11 Qwest filed its supplementation with this Commission. This Commission initiated a review to
12 analyze and evaluate Qwest's Operational Support Systems (OSS) in order to determine its
13 compliance with the 1996 Telecommunications Act and with relevant FCC Orders.

14 15. This review started in May, 1999 as a limited Scope Review of Qwest's OSS. The
15 review included the examination of work in other States and a review of relevant FCC rulings. It also
16 included a limited Functionality Test. Procedural Orders dated June 8, 1999 and July 2, 1999 first
17 deferred the OSS Test Schedule in order to clarify standards against which to measure and to expand
18 the work scope to include third-party testing of a much broader magnitude than originally anticipated.
19 These changes/expansions were made in recognition of the work in Texas and New York and a
20 realization that the initial test planned in Arizona was not rigorous enough.

21 16. Therefore a revised, expanded program was developed. The objective was to conduct
22 a fair, equitable, comprehensive test which would meet ACC needs, FCC requirements and obtain
23 Department of Justice (DOJ) concurrence. This program would demonstrate the extent to which
24 Qwest complies with FCC Checklist Items, has opened its territory to competition, provides parity to
25 CLECs and a meaningful opportunity to compete.

26 17. The test was designed to be conducted in an open, collaborative and constructive
27 manner, intended to move ahead promptly, but not at the expense of quality.

1 18. A Master Test Plan (MTP) was developed which included five tests, as follows:
2 Functionality, Capacity, Retail Parity, Relationship Management and a Performance Measurement
3 Evaluation. Functionality and Capacity Tests had been conducted previously in other jurisdictions.
4 The Retail Parity Test was introduced in Arizona. It was designed to determine the parity of
5 information and the experience of the Competitive Local Exchange Carrier (CLEC) representative
6 with the Qwest representative in dealing with a customer, and whether any differences were
7 transparent to the end-user customer. The Relationship Management Evaluation was intended to
8 determine the interaction between Qwest and the CLECs, and the effectiveness of Qwest's change
9 management process. A comprehensive, detailed Performance Measurement Evaluation of a
10 statistically valid audit of three months of data was intended to determine whether Qwest's data
11 collection and processing methods were accurate, that Qwest was reporting factual results, and that
12 the data therefore were valid and could be relied upon for determining OSS Testing results and
13 ongoing Qwest performance through the use of commercial data.

14 19. The tests were designed as military style tests in which one tests, fixes problems, and
15 retests until it is determined that the fix has worked, or that there is no further benefit to be gained
16 from additional retesting.

17 20. On August 27, 1999 a Request for Proposal was issued by this Commission for a Test
18 Administrator to conduct a comprehensive evaluation of Qwest's OSS in accordance with a
19 previously developed Master Test Plan ("MTP"). Cap Gemini Ernst & Young (CGE&Y) was
20 formally designated to serve as the Test Administrator for this Commission's investigation of
21 Qwest's OSS. Hewlett-Packard was selected to be the Test Transaction Generator, known as a
22 Pseudo-CLEC. In effect, the Commission set up an operating Competitive Local Exchange Carrier
23 (CLEC) in order to generate and process transactions which would proceed through the Qwest
24 interfaces to interact with its OSS, and report status back to the Pseudo-CLEC. For all practical
25 purposes it looked like, and acted like, a real telephone company with real customers and real
26 transactions. The Pseudo-CLEC allowed testing participants to go through the experience of a start-
27 up CLEC with Qwest.

1 21. In September, 1999, a series Workshops were convened by this Commission to review
2 and refine the initial MTP, with all interested parties to this proceeding. Attendees included the Test
3 Administrator, ACC Staff, Qwest and interested CLECs. The sessions produced many modifications
4 to the initial MTP and elicited agreement by all the parties on the content to be included in the OSS
5 test. The MTP was subsequently docketed in this proceeding.

6 22. The extensive use of Workshops starting in September, 1999 and continuing to July,
7 2002, was a major vehicle for implementing the collaborative process. Initially these workshops
8 focused on enhancing the MTP and reaching agreement on its content by all parties. Workshops then
9 focused on the development of Performance Indicator Definitions and Measurements (either parity or
10 benchmarks) which would be applied thereto. Another mechanism for implementing the
11 collaborative process was the establishment of a Test Advisory Group (TAG). This group included
12 all key CLECs, Qwest, CGE&Y, the ACC and DCI. The group has met at least twice each month
13 since its formation in late November, 1999, until April 10 2003. It continues the parties participation
14 and collaboration, and provides a mechanism for agreement (consensus) or escalation of disputes, and
15 their resolution by the ACC. A number of sub-committees assisted the TAG; principal among these
16 were the Statistics, Capacity, and Billing sub-committees.

17 23. Since November, 1999 the TAG has maintained a membership list; published agendas
18 and minutes to all interested parties; identified issues and resolved disputes among the parties. The
19 TAG meetings were facilitated by the Test Administrator. The TAG constituted the principal
20 governance body for the Section 271 OSS Test.

21 24. The MTP was augmented by a Test Standards Document ("TSD") developed by the
22 Test Administrator with consultation by the TAG. The TSD acts as the principal implementation
23 guide to the Test Administrator. The TSD provided detailed Test Cases within designated scenarios,
24 together with scripts and other exact specifications as to how the Arizona tests were to be conducted.

25 25. In the year 2000, planning and development and collaboration on the test continued.
26 In addition, the OSS Test process was enhanced by the development of a "Friendlies" process. Over
27 350 Friendlies became real customers of the Pseudo-CLEC. In addition to developing the Friendlies
28

1 the Pseudo-CLEC was certificated, developed and entered into an Interconnection Agreement with
2 Qwest, completed all setup requirements and conducted pre-operational testing.

3 26. The year 2000 also saw the resolution of a great number of issues through the open
4 collaborative process. One of the major issues which required resolution prior to the initiation of any
5 OSS Testing was that of Performance Measurements. In the fall of 1999 when the Workshops first
6 addressed this subject, it became apparent that Qwest's Performance Measures were completely
7 inadequate to serve as a basis for evaluating the results of the forthcoming tests. During the course of
8 the Year 2000, indeed, into 2001, additional performance measures were developed, existing
9 performance measures were adjusted, sub-measures were established to address project and service
10 subsets, and the definition of data against which to measure was refined. It was also necessary to
11 address changing requirements as defined by FCC rulings that were issued during this period, and to
12 address those new products and services that came online.

13 27. In addition to completing development of the range of subjects involved in the overall
14 FCC 271 program, several of the individual tests were started during the year 2000. The
15 Performance Measurement Evaluation of three months data was conducted, and an interim report
16 published in November, 2000. The Retail Parity and Relationship Management Evaluations were
17 also initiated in the fall of 2000. Initial transactions of the Functionality Test were transmitted from
18 the Pseudo-CLEC to Qwest on December 21, 2000, and a low level of transaction activity was
19 continued in the last week of the month. Transactions at the full level intended for the Functionality
20 Test were initially commenced in January 2001.

21 28. The OSS tests were performed in a live environment, but in such a fashion so as not to
22 disrupt existing customer services. This was done as an overlay to normal retail and CLEC activity.
23 By so doing, the Pseudo-CLEC and the Test Administrator were able to observe the same
24 performance characteristics that normal CLECs see in the conduct of their business. The Test
25 Administrator and Pseudo-CLEC maintained the greatest degree of "Blindness" practical. CGE&Y
26 and HP's test was very broad, examining all stages of the relationship between Qwest and competing
27 carriers, including the initial relationship, performing daily operations, and maintaining the

1 relationship.

2 29. Electronic gateways supported by Qwest serve as the means by which CLECs
3 accessed Qwest's OSS systems. The specific electronic gateways considered within the scope of this
4 testing were Interconnect Mediated Access (IMA) and Electronic Data Interchange (EDI) interface
5 for pre-order and order; Electronic Bonding - Trouble Administration (EB-TA) and Customer
6 Electronic Maintenance & Repair (CEMR) (supplanting EB-TA) for maintenance and repair and;
7 Exchange Message Interface (EMI) and EDI for billing.

8 30. Testing encompassed various order types associated with three primary modes of
9 CLEC entry; resale, unbundled network elements, and number portability. CGE&Y and HP
10 performed pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions to
11 evaluate the functional capabilities of Qwest's OSS and whether competing carriers receive a level of
12 service comparable to Qwest's retail service. Testing was performed for specific product types
13 including resale (with parity tests against the retail equivalents), UNE-P, number portability, and
14 UNE-L (with and without number portability). Testing included both residence and business orders
15 for the following situations: "new," "conversion as is," "conversion as specified," "partial
16 migrations," "change," "supplementals," "disconnect," "cancel," "suspend," and "restore" - each
17 relevant to specific product scenarios that were being tested.

18 31. Following the OSS Test, results were utilized in data reconciliation and validation
19 that contrasted Qwest and Pseudo-CLEC data. In addition, a separate data reconciliation effort by the
20 Liberty Consulting Group correlated information provided by the participating CLECs with Qwest's
21 reporting of performance results, under the measures defined in the Performance Indicator
22 Definitions (PIDs).

23 32. The Retail Parity Draft Final Report was issued by CGE&Y on July 5, 2001 and a
24 Workshop conducted on August 7-9, 2001.

25 33. The Relationship Management Draft Final Report was issued by CGE&Y on
26 September 27, 2001 and a Workshop conducted on October 9-11, 2001. A supplemental Workshop
27 was conducted on December 10-11, 2001 to address the subordinate issue of Change Management.

1 34. The Capacity Draft Final Report was issued by CGE&Y on October 1, 2001 and a
2 Workshop conducted on October 25-26, 2001.

3 35. The Functionality Draft Final Report was issued by CGE&Y on October 11, 2001 and
4 a Workshop conducted on November 27-29, 2001.

5 36. The Draft Final Report on all testing and retesting was issued by CGE&Y on
6 December 21, 2001 and a Workshop conducted during the period January 28 through January 31,
7 2002. CGE&Y released its Final Report on March 29, 2002.

8 37. In addition, Hewlett-Packard was directed to perform an evaluation of Qwest's Stand
9 Alone Test Environment ("SATE"). A Draft SATE Report was issued by Hewlett-Packard and a
10 Workshop was conducted on December 13 and 14, 2001. A supplemental investigation was
11 authorized and performed by Hewlett-Packard which concluded in an additional Report from
12 Hewlett-Packard and a Workshop conducted as part of the Final Report Workshop during the period
13 January 28 through 31, 2002.

14 38. CLECs and Qwest debated the results of each OSS Test in comments filed on each test
15 report and in the Workshops. CLECs generally challenged test results while Qwest supported them.
16 Certain challenges led to retests. All issues concerning test data and results were resolved. Since test
17 result and data issues are described in detail in the various test reports, they are not repeated here.
18 The interim workshop process allowed many of the CLECs' challenges to the test to be resolved
19 early through retesting or other means.

20 39. Commission Staff issued a Supplemental Checklist Item 2 Report containing its Final
21 OSS Test Report and Recommendation to the Commission on May 1, 2002. Staff subsequently
22 issued another Supplemental Checklist Item 2 Report containing its final Report and
23 Recommendation to the Commission on Qwest's Change Management Process and Stand-Alone Test
24 Environment on May 8, 2002.

25 40. On May 17, 2002, interested parties filed Comments on the Final Reports of CGE&Y
26 and HP, and on the Staff's Final Reports and Recommendations. Parties filing comments included
27 AT&T, WorldCom and Qwest. The concerns raised in the Parties' Comments can be generally
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1 grouped into the following six broad categories. 1) Qwest's Change Management Process and the
2 CLECs' claim that Qwest has failed to demonstrate a pattern of compliance, 2) Qwest's Stand-Alone
3 Test Environment and CLECs' claim that the most recent version of SATE has not been tested to
4 demonstrate that it mirrors production, 3) Qwest's preorder-to-order integration and the CLECs' lack
5 of transaction testing, 4) DUF Billing issues, 5) Retail parity issues including access to a CLEC's end
6 customer record following order completion, ability to reserve large blocks of telephone numbers,
7 and how changes to a CLEC customer can be initiated, and 6.) CGE&Y's Performance Measurement
8 Evaluation.

9 41. Each of the concerns raised by the parties in their May 17, 2002 comments will be
10 discussed in the context of the evaluation to which they pertain, i.e., Relationship Management,
11 Functionality, Retail Parity, Capacity or the Performance Measurement Evaluation. It should be
12 noted at the outset that this Order only addresses the remaining concerns of the parties as set forth in
13 their Comments filed on May 17, 2002. The interim Workshop process was very effective in
14 addressing many of the initial concerns of the parties.

15 III. DISCUSSION

16 A. Relationship Management Evaluation

17 42. CGE&Y concluded that: (a) Qwest's CLEC account establishment processes are
18 sufficient. During the course of the evaluation, Qwest continued its efforts to improve its processes
19 and the quality of information available; (b) Qwest's current account management processes are now
20 sufficient, although the original processes appeared to require reinforcement and/or improvement
21 based on the many negative comments received from CLECs on this subject; (c) Qwest's interface
22 development process is sufficient. Feedback from CLECs was positive regarding the knowledge of
23 the staff and the project management processes Qwest uses; (d) the on-line documentation available
24 to CLECs is sufficient and has been vastly improved over the course of the Arizona Section 271 Test;
25 and (e) complete redesign of CICMP to a new Qwest CMP is in progress. The new CMP is a
26 collaborative process that is addressing many of the previously identified deficiencies.

1 43. In its Report and Recommendation, Staff agreed with CGE&Y that Qwest had
2 undergone significant improvement in this area and that its processes were now such that Staff
3 believed it met all FCC requirements in this regard. Staff, however, offered several recommendations
4 to ensure Qwest's continued compliance in this area, and also recommended that all CGE&Y and HP
5 recommendations discussed herein be adopted by the Commission as well.

6 1. **Qwest's Change Management Process**

7 a. **CLEC's Position**

8 44. AT&T and WorldCom both argue that Qwest does not meet several of the FCC's
9 requirements for CMP compliance, namely, that 1) while all parties have agreed to conceptual
10 resolution of the issues on the priority list, Qwest and the CLECs must still complete drafting the
11 language and until that task is complete, Qwest cannot demonstrate that its CMP is contained in a
12 single document as required by the FCC, and, 2) Qwest cannot demonstrate a pattern of compliance
13 with its CMP over time. WorldCom Comments at pp. 4-10; AT&T Comments at p. 70. AT&T also
14 argues that Qwest should be required to respond to and resolve all outstanding exceptions and
15 observations that the ROC third-party testers have issued concerning Qwest's CMP and that Qwest
16 be required to demonstrate that its Product Catalog (PCAT) and Technical Publications are consistent
17 with its Statement of Generally Available Terms and conditions ("SGAT"). AT&T Comments at
18 p. 70.

19 45. WorldCom also relies upon several KPMG exceptions in the ROC test that remain
20 open. Exception 3110 noted that Qwest's CMP managers do not employ a centralized mechanism to
21 track and ensure that documentation release intervals are being followed for all upcoming software
22 releases. WorldCom Comments at p. 11. KPMG consulting was not able to observe adherence to the
23 documented process for notification interval management. *Id.* In addition, KPMG Exception 3111
24 noted that due to the schedule of the test, it would not be possible to determine if Qwest's
25 documented processes provide the ability to perform adequate tracking and adherence to the
26 documentation release intervals in the Master Redlined CLEC-Qwest CMP Redesign Framework.
27 WorldCom Comments at p. 11. WorldCom also takes note of KPMG Exception 3094 which

1 addresses product and process changes. WorldCom states that because the product and process
 2 aspect of CMP was a negotiated agreement between Qwest and the CLECs, Qwest was bound to
 3 implement the product and process aspect of CMP. WorldCom Comments at p. 12. WorldCom
 4 asserts that as a result it is premature to approve Qwest's CMP at this time and that Qwest should not
 5 be rewarded for its dilatory activities for change management; but rather should be ordered by the
 6 Commission to complete the job. WorldCom Comments at p. 13.

7 46. AT&T also argues that the FCC made clear to Qwest in September 1999 that an
 8 independent evaluator should assess the BOC's change management process and should include, but
 9 not be limited to, a review of the BOC's ability to implement at least one significant software release.
 10 AT&T Comments at p. 74. AT&T argues that this last requirement has not been met. Id.

11 **b. Qwest's Position**

12 47. Qwest, on the other hand, believes that it meets all of the FCC's criteria for an
 13 effective CMP. Qwest states that it has worked with the CLECs collaboratively for the last ten
 14 months and that it and the CLEC community have reached agreement on all material aspects of
 15 Qwest's CMP. Qwest Comments at p. 107. Qwest further stated that it has implemented the
 16 redesigned process as agreements were reached and that the core provisions of Qwest's redesigned
 17 CMP have now been in place for six months. Id.

18 48. Qwest states that both CGE&Y and Staff found it compliant in this regard, with the
 19 exception of having demonstrated a pattern of compliance with the plan over time. However, Qwest
 20 states that it recently submitted a Verification of Compliance with its Change Management Process,
 21 as requested by Staff, which Qwest claims establishes a five month pattern of strict adherence for the
 22 core provisions of the process. Qwest Comments at p. 109. Qwest states that its average compliance
 23 rate to-date is 98%. Qwest Comments at p. 113. It further reported the following compliance rates:

- 24 (a) In processing CRs, Qwest has met more than 99% of its
 25 commitments;
 26 (b) In introducing a new GUI, Qwest has met 100% of the milestones;
 27 (c) In changing an application -to-application interface, Qwest has met
 28 100% of the milestones reached thus far;
 (d) In changing a GUI, Qwest has met 100% of the milestones;
 (e) In processing escalations, Qwest has met 98% of its commitments.

1 Qwest's Comments at p. 113.

2 **c. Staff's Position**

3 49. Staff believes that Qwest's CMP meets the criteria set forth by the FCC, with one
4 exception. The exception is that Qwest could not at the time verify that it had established a pattern of
5 compliance and had adhered to this pattern over time. Staff required Qwest to submit a Verification
6 filing, which Qwest recently submitted, to demonstrate compliance with CMP processes and
7 procedures to-date. Staff also recommended, inter alia, several other reporting requirements aimed at
8 ensuring that Qwest complies on a going forward basis with agreed upon CMP processes and
9 procedures.

10 **2. Qwest's Stand-Alone Test Environment**

11 **a. CLEC's Position**

12
13 50. AT&T and WorldCom also argue that Qwest does not provide a stable testing
14 environment that mirrors production, and therefore, it cannot meet the FCC's fourth CMP criteria.
15 WorldCom Comments at p. 14; AT&T Comments at p. 77-104. AT&T and WorldCom argue that a
16 testing environment that is stable and mirrors production means that transactions will complete in the
17 test environment as they do in production, and that the test environment reflects production business
18 rules such that no additional coding beyond the published, production, business rules is required.
19 AT&T Comments at p. 77; WorldCom Comments at p. 15. WorldCom goes on to state that the test
20 environment should be separate from the production environment, but utilize replicates of all the
21 processes, databases, and hardware used in the production environment. Id. This allows CLECs to
22 test real transactions all the way through the process. Id. There must be a "test deck" that provides
23 scenarios that are run each time new software release/upgrade is loaded into the environment. Id.
24 This, according to WorldCom, will allow for regression testing to ensure that software changes being
25 implemented as part of the release do not negatively interfere with the existing processes and code.
26 WorldCom Comments at p. 15. WorldCom also argues that if SATE is not tested with real
27 transactions that are then submitted in the production environment, the Commission only has Qwest's

1 word that SATE is stable and mirrors production. WorldCom Comments at p. 16. AT&T also
2 argues that Qwest's SATE does not mirror production. AT&T Comments at p. 77. AT&T
3 recommends that the issue of whether Qwest made sufficient progress in achieving the production
4 mirror testing hallmark be decided based upon results following implementation of the new
5 measurement process and compliance with the requirements contained in the impasse resolution of
6 Phase IV testing on an existing or new release. Id.

7 51. WorldCom states that according to Qwest several CLECs and one service bureau have
8 successfully tested SATE and constructed EDI interfaces, but that Qwest fails to provide any detailed
9 evidence describing, for example, what version of SATE was tested, whether the CLECs and Qwest
10 participated in regression testing, or the extent of any testing done. Id. WorldCom also argues that
11 Qwest did not discuss whether those CLECs and the service bureau successfully implemented their
12 interfaces after using SATE version 9.0, which includes Virtual Interconnect Center Knowledge
13 Initiator ("VICKI"), a component of Qwest's test environment that influences order flow and
14 responses. WorldCom Comments at p. 16. WorldCom states that Staff is wrong in its statement that
15 "production mirror testing" also known as Phase 4 of the HPC retest is not necessary and the further
16 evaluation of Qwest's VICKI is not necessary prior to Qwest obtaining a favorable 271
17 recommendation. WorldCom Comments at p. 18. Both AT&T and WorldCom state that acceptance
18 of HP's SATE assessments to date is not warranted because of its primary failure to evaluate the
19 SATE's likeness to the production environment and the VICKI component. WorldCom Comments
20 p. 18; AT&T Comments at pp. 82-83; and 86.

21 52. WorldCom also states that the Staff improperly resolved the Impasse Issue on
22 Production Likeness Testing (Master Issue # 943) and improperly used as part of its justification the
23 production likeness testing that HP conducted in its first assessment of SATE. WorldCom
24 Comments at p. 19. In addition to message content differences, WorldCom refers to discrepancies
25 found by HP related to business rules consistency between the STATE and production systems.
26 WorldCom Comments at p. 19. WorldCom argues that the fact that Qwest resolved the discrepancies
27 that were uncovered does not equate to an overall finding that SATE mirrors production. WorldCom

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1 Comments at p. 19. WorldCom also argues that Staff did not give enough weight to the critical
2 aspect that VICKI plays in the effectiveness of SATE and that it performs a central role in SATE for
3 emulating production order flow-through procedures. WorldCom Comments at p. 19. WorldCom
4 also argues that HP's assessment is incomplete due to the lack of regression testing which is the
5 process of verifying that the upgrades associated with a new release do not adversely impact other,
6 existing critical functionality from previous releases. WorldCom Comments at p. 20. AT&T also
7 argues that HP had included Phase IV or production mirroring testing in its Test Plan, but that based
8 upon Qwest comments, unilaterally eliminated Phase IV testing without allowing any input from the
9 CLECs. AT&T Comments at pp. 82-83.

10 53. AT&T is also concerned with the limited negative testing done by HP and the fact that
11 the CLECs have been unable to get a listing from Qwest for error codes that are sent by the Legacy
12 Systems that reside behind the Business Process Layer ("BPL") and which the BPL simply passes
13 through to the CLEC. AT&T Comments at p. 85. Its other concerns relate to the fact that the VICKI
14 module which allows automated (rather than manual) processing of post order activity such as FOCs,
15 SOC's and other functions, was not subject to a comprehensive evaluation; HP's failure to test flow-
16 through or real time capability; HP's failure to do a volume capacity test; and the fact that AT&T
17 believes that the SATE functionality is not adequate in terms of process and support and the limited
18 range of products that are supported by SATE. AT&T Comments at pp. 85-88. Finally, AT&T
19 argues that Qwest's SATE failed both the new release and initial testing benchmarks and/or
20 standards. AT&T Comments at pp. 92-95.

21 54. Finally, both AT&T and WorldCom rely upon two outstanding ROC KPMG
22 Exceptions, 3077 and 3095, which were closed by KPMG as "unresolved." WorldCom Comments at
23 p. 20. Those Exceptions noted that: 1) SATE does not generate post-order responses in the same
24 manner as they are created in the production environment; 2) flow through orders are not supported
25 in SATE; 3) the volume of order responses supported in SATE is restricted due to manual response
26 handling, 4) the data contained within the order responses is not consistent, and may not mirror the
27 data that would be found in production responses.

1 55. AT&T and WorldCom took to impasse the issue of production mirroring and VICKI
 2 testing. Staff resolved the impasse by adopting a recommendation of AT&T at the last 271 workshop
 3 held in April, 2002. HP will be required to evaluate and provide a report on Qwest's execution of
 4 transactions in Release 9.0 and production. AT&T agrees with the impasse resolution but believes
 5 that the Commission should wait until it reviews the results of this analysis before reaching a
 6 conclusion that SATE mirrors production. AT&T Comments at p.84.

7 56. AT&T made the following recommendations that it stated should be implemented
 8 before the Commission makes its final decision regarding the adequacy of Qwest's SATE:

- 9
- 10 a. SATE should be tested against a much larger set of BPL error codes and a
 11 large set of legacy system error messages,
 - 12 b. SATE should be updated to simulate all common error situations of the legacy
 13 systems,
 - 14 c. SATE should be retested after new error messages have been programmed,
 - 15 d. VICKI enhancement for post-order processing should be completely tested,
 - 16 e. Additional commonly used products in SATE such as Line Splitting and Loop
 17 Splitting should be implemented and tested,
 - 18 f. Flow through capability for SATE should be completely tested;
 - 19 g. HP should correct calculation errors and remove all biased analysis from their
 20 final report, and
 - 21 h. SATE release 10.0 should be tested by a third party. Qwest should be required
 22 to have an independent third-party test SATE releases until the initial error rate
 23 for a new release is below 5%, as measured by an unbiased, third party.

24 AT&T Comments at pp. 104-105.

25 **b. Qwest's Position**

26 57. Qwest states that its SATE was developed in May, 2001 and implemented on July 31,
 27 2001 as an alternative test environment to the interoperability environment. Qwest Comments at
 28 p. 118. Qwest states that its SATE provides a CLEC with the ability to learn how Qwest's IMA-EDI
 functions work and the ability to test its interface in a test environment that returns pre-defined test

1 scenarios that mimic production responses. Qwest Comments at p. 118. Qwest states that it provides
2 the account data and scenario information to users through the IMA-EDI Data Document for SATE.
3 Qwest Comments at p. 118. Qwest states that by providing CLECs with a self-contained, production-
4 like environment for sending transactions, CLECs have the opportunity to experience an environment
5 that acts like production IMA-EDI without interfacing with the actual production environment. Id.
6 Qwest also states that SATE permits CLECs to perform regression testing, in which a CLEC
7 determines whether systems changes on its side of the EDI interface will affect its ability to execute
8 transactions with Qwest. Id. Qwest states that it makes the same support teams available in SATE to
9 CLECs to assist in testing and certifying CLEC interface software as it does in the interoperability
10 environment. Id. Qwest states that it provides CLECs with the IMA-EDI Implementation Guide and
11 other documentation to aid in the utilization of SATE. Qwest Comments at p. 119. Finally, Qwest
12 states that it built SATE to provide products and transactions that were being ordered by the CLECs
13 through IMA-EDI. Id. CLECs may also request through CMP that Qwest include additional
14 products and functionality in its suite of SATE transactions. Id.

15 58. Qwest states that its SATE meets all FCC requirements at this time, and that HP found
16 that its SATE was adequate in this regard. Qwest argues that the FCC does not require that the
17 testing environment be identical to the production environment, but only that it be adequate to allow
18 CLECs to test adequately OSS changes prior to their implementation as long as the testing and
19 production environments perform the same key functions. Qwest Comments at p. 122. Qwest states
20 that its SATE mirrors production because it allows CLECs to run transactions that generate the same
21 responses as in production without actually using production data or production systems. Id.

22 59. Qwest argues that HP conducted two thorough and comprehensive evaluations of its
23 SATE, providing the most extensive evaluation undertaking to-date. Qwest Comments at p. 124.
24 According to Qwest, HP conducted transactional testing against four SATE releases, evaluated Qwest
25 documentation for completeness and usability, and evaluated Qwest's SATE processes against the
26 documentation and transactional testing. Qwest Comments at p. 124. Qwest also argues that it is not
27 necessary to test new capabilities, which are constantly added, such as VICKI (the automation of
28

1 post-order processing) and flow-through which will be implemented in mid-May. Qwest Comments
2 at p. 127.

3 60. Qwest also states that the FCC has held that commercial usage demonstrating that
4 CLECs are able to achieve production status and test new releases indicates that a testing
5 environment is adequate. Qwest states that to-date, five individual CLECs, as well as five others
6 through a service bureau, have successfully completed testing using SATE and have been certified in
7 production for pre-order to ordering capabilities. Qwest Comments at pp. 123-124.

8 **c. Staff's Position**

9
10 61. Staff believes that Qwest has demonstrated that it provides a stable testing
11 environment which mirrors production. In order to ensure that the SATE remains adequate, Staff
12 recommends adoption of all of HP's recommendations relating to the SATE and adoption of Staff's
13 recommendations as well, as cited in paragraphs 146, 147 and 149 herein.

14 **3. TSD/MTP Compliance Issues**

15 **a. CLEC's Position**

16
17 62. AT&T raises a host of TSD and MTP compliance issues alleging that CGE&Y failed
18 to follow the MTP and TSD in many cases, raising issues about the overall credibility of the test.
19 AT&T claims that CGE&Y failed to produce an inventory of the Qwest documentation that it
20 reviewed in the course of the Relationship Management Evaluation. AT&T Comments at p. 11.
21 AT&T argues that CGE&Ys not making the inventory available denied the CLECs and the ACC an
22 opportunity to review the test documentation that CGE&Y used as a basis for closing IWOs. AT&T
23 Comments at p. 12.

24 63. AT&T also argues that CGE&Y failed to interview CLECs to obtain commercial
25 experiences for account establishment and account management. AT&T Comments at p. 21. AT&T
26 objects to the exclusive use of questionnaires by CGE&Y and that even when CGE&Y found that
27 CLEC responses were "lacking", it did not perform formal interviews with the CLECs. AT&T

1 Comments at p. 23. The lack of data gives the Commission no perspective on whether smaller, less
2 technically oriented CLECs have access to account management resources that are suitable for
3 entering and/or surviving in the market. AT&T Comments at p. 24.

4 64. AT&T also argues that CGE&Y failed to examine internal Qwest practices and
5 procedures to determine their adequacy for supporting CLEC relationships and day-to-day activities.
6 AT&T Comments at p. 29. AT&T argues that CGE&Y merely took the view that the internal Qwest
7 process would consistently and reliably function, according to the documented practices, processes,
8 and procedures followed by Qwest personnel, without question. AT&T Comments at p. 30. AT&T
9 argues that Staff fails to comprehend the nexus between documented procedures and the behavior of
10 Qwest organizations in performing the necessary functions. AT&T states that the process results are
11 not assured without documented M&Ps that are enforced through supervisory reviews and
12 accountability. AT&T Comments at p. 33. AT&T argues that the Commission should require a
13 verification that all of Qwest's internal processes that deliver support functions to CLECs for the OSS
14 functional areas are clearly documented and institutionalized within Qwest's service centers. AT&T
15 Comments at p. 34.

16 65. AT&T argues that CGE&Y failed to evaluate the Qwest Help Desk documentation.
17 AT&T states that Staff urged CGE&Y to include its review of the Help Desk documentation in its
18 Final Report, but that no such information was included by CGE&Y in its Final Report. AT&T
19 Comments at p. 35. Whether the Help Desk performs according to Qwest management design will
20 determine the extent to which the Help Desk is appropriately staffed, funded, and operated so that
21 CLEC questions can get answered. AT&T Comments at p. 36.

22 **b. Qwest's Position**

23 66. Qwest argues that CGE&Y followed the MTP and TSD in all instances and that
24 CGE&Y was allowed to apply its collective experience and judgment in determining how best to
25 carry out the TSD and MTP requirements and that is exactly what it did. Qwest Comments at p. 88.
26 With regard to the requirement to interview the CLECs, Qwest points out that both CGE&Y and Staff
27 proactively contacted CLECs to encourage them to provide input several times. Qwest Comments at
28

1 p. 89. CLECs were invited to call CGE&Y to provide further comment. Id. CGE&Y also contacted
2 CLECs to conduct informal interviews. Id. CGE&Y conferred with CLECs to clarify specific
3 answers on questionnaires. Id. In other instances CLECs approached CGE&Y requesting to discuss
4 specific issues. Id. With regard to CGE&Y's focus on Qwest's interaction with CLECs rather than
5 Qwest's internal processes, Qwest states that CGE&Y did what it was required to do, i.e., review the
6 external documentation Qwest provides to CLECs. Qwest Comments at p. 92. Nonetheless, Qwest
7 argues that through data requests, CGE&Y also obtained and reviewed specific information regarding
8 Qwest's internal processes, procedures, or flowcharts during the course of performing root cause
9 analysis in processing IWOs. Qwest Comments at p. 92.

10 67. With regard to training, Qwest states that CGE&Y's findings reflect the tremendous
11 progress Qwest has made in improving its CLEC training program. Qwest Comments at p. 93.
12 Qwest states that all TSD objectives were satisfied with one minor exception relating to a training
13 class that was attended by the Pseudo-CLEC prior to improvements made to the Qwest training
14 program. Qwest Comments at p. 94. With regard to the Help desk operations, Qwest stated that in
15 order to address a specific issue raised in the IWO regarding Qwest's failure to meet a two-hour
16 commitment for closure of escalation tickets, Qwest produced three months of commercial data
17 demonstrating that Qwest had met its two-hour commitment for 92.28 percent of calls during that
18 period. Qwest Comments at p. 95. Qwest also points out that AT&T's concerns regarding Help
19 Desk training deficiencies were resolved through retesting. Qwest Comments at p. 97.

20 c. Staff's Position

21 68. Staff believes that CGE&Y was entitled to some discretion to use its professional
22 judgment and experience to determine how best to carry out the TSD and MTP requirements. The
23 instances of noncompliance raised by the CLECs constitute either interpretational differences or
24 disagreements with how CGE&Y chose to exercise its professional judgment. Staff believes that
25 the CLECs have not demonstrated any concrete harm with the examples they cite that would rise to
26 the level sufficient to deny Qwest long distance market entry at this point in time.

1 **d. Commission Resolution**

2 **1. Change Management Process**

3 69. The following five criteria must be met in order for a BOC to demonstrate that it has
4 an effective change management process: 1) information relating to the change management process
5 is clearly organized and readily accessible to competing carriers; 2) competing carriers had
6 substantial input in the design and continued operation of the change management process; 3) the
7 change management plan defines a procedure for the timely resolution of change management
8 disputes; 4) the availability of a stable testing environment that mirrors production; and 5) the
9 efficacy of the documentation the BOC makes available for the purpose of building an electronic
10 gateway. In addition, Qwest must demonstrate a pattern of compliance or adherence to its plan over
11 time.⁸

12 70. The CLECs' arguments regarding the process itself are essentially three-fold. First,
13 they claim that there is no single document today which contains all of the agreed upon CMP
14 processes which Qwest is required to follow. Second, the CLECs claim that Qwest cannot establish a
15 pattern of compliance over time because its CMP has not been in effect long enough. Third, AT&T
16 claims that an independent third party review of Qwest's compliance with CMP documented
17 processes and procedures has not yet been undertaken for a major Release.

18 71. The Commission does not agree with the CLEC's arguments in all cases. First, the
19 reports of Staff and its Consultants clearly establish that Qwest and the CLECs have all come to
20 conceptual agreement on the major outstanding issues relating to Qwest's CMP. Qwest has since
21 reached agreement on specific language with the CLECs for incorporation into its Master Red-Lined
22 document. Qwest filed the final Master document with the Commission in November, 2002.

23 72. With respect to the requirement that Qwest demonstrate compliance over time,
24 Qwest's Verification filed with the Commission recently at Staff's request, demonstrates that Qwest
25

26 ⁸ In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company and
27 Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to
28 Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas,
Memorandum Opinion and Order, CC docket NO. 00-65, FCC 00-238 (Rel. June 30, 2000) at para. 108
(hereinafter "SWBT Texas 271 Order").

1 is consistently adhering to its processes since they have taken effect. The isolated instances of
2 noncompliance raised by WorldCom and AT&T appear to be the exception rather than the rule.
3 Some of the instances of noncompliance are more indicative of initial implementation glitches rather
4 than anything else and we are confident that Qwest has taken steps to rectify problems of this nature,
5 and if it has not, that it soon will. We thus believe that Qwest has demonstrated that it has met
6 Section 271 requirements for an effective Change Management Process, subject to Commission
7 resolution of the CMP issues raised in the supplemental July, 2002 workshop. Nonetheless, since the
8 Qwest CMP is relatively new, close oversight by the Commission should be ongoing for some period
9 of time and thus we adopt the recommendations of Staff and its consultants for continued reporting
10 by Qwest in this area. We also believe, as AT&T has suggested, that ongoing compliance is best
11 established by TA review of Qwest's compliance with its processes and procedures for its next major
12 Release 10.0. The TA has since conducted such a review and filed a written report with the
13 Commission. In its report, the TA found that once the IMA Release 10.0 changes were reviewed,
14 prioritized, and scheduled, the deployment and notification process worked satisfactorily.

15 **b. Qwest's Stand-Alone Test Environment**

16 73. The FCC requires that BOCs such as Qwest make available a stable testing
17 environment that mirrors production. See, SWBT Texas 271 Order at para. 108.

18 74. The CLECs do not believe that HP's evaluation was rigorous enough to demonstrate
19 either that the SATE Qwest offers is stable or mirrors production. The Commission does not agree.
20 First, HP evaluated SATE Releases 7.0, 8.0, and 8.1. After completing its evaluation, HP concluded
21 that "SATE is adequate to support Qwest CLEC Testing in the State of Arizona, given the current
22 level of CLEC usage." HP was subsequently asked by the Commission to also evaluate whether the
23 SATE was adequate for full release testing. As a result of HP's second evaluation, HP found that the
24 Qwest SATE is adequate to support New Release Testing by a CLEC.

25 75. We also do not accept the CLEC's arguments that HP was required to do a full scale
26 or comprehensive test of the VICKI and flow-through functionalities before the Qwest SATE could
27 be found to be adequate or to mirror production. First, HP did some limited testing of VICKI in its
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1 testing of the new release. However, to go beyond this, and require comprehensive testing of the
2 VICKI (implemented in SATE Release 9.0) and the flow-through (which is not even available yet)
3 enhancements implemented after the initial evaluation by HP, is something that the Commission
4 believes goes beyond current FCC requirements. To impose a requirement upon a BOC that it must
5 test all subsequent enhancements to its SATE would be unduly burdensome and onerous. While the
6 VICKI and flow-through enhancements are certainly important, we stop short of requiring HP to go
7 back and reperform its initial evaluation so that these two functionalities can be subject to a new
8 comprehensive test.

9 76. We also reject the CLEC's other argument that Qwest has not demonstrated that its
10 SATE adequately mirrors production. Here we rely upon passages from the FCC's Orders which
11 indicate that a BOC is not required to provide a testing environment that is exactly identical to its
12 production environment. Rather, the test environment must be adequate to allow CLECs to test
13 adequately OSS changes prior to their implementation as long as the testing and production
14 environments perform the same key functions. We acknowledge WorldCom's concern that HP in its
15 evaluation found discrepancies related to business rules consistency between the SATE and
16 production systems. However, we find important the fact that Qwest responded to such discrepancies
17 and corrected them quickly. The other discrepancies found by HP related not to the form or
18 functionality of the SATE but to its message content.

19 77. Moreover, it is important that Qwest and the parties have agreed to a new
20 interpretation of PO-19, an interpretation advanced by AT&T, which will run matched transactions in
21 SATE Release 10.0 against production and will do so on a going forward basis for all other SATE
22 Releases, thus ensuring that SATE mirrors production on an ongoing basis in the future. The PID
23 also incorporates regression testing, to ensure that old releases are not impacted by new release
24 implementation.

25 78. To the best of our knowledge, this is the first full scale evaluation of its kind. Most
26 other CLECs have relied upon commercial data to support the overall adequacy of their testing
27 environments. In the Qwest region, to date, five individual CLECs, as well as five others through a
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1 service bureau, have successfully completed testing using SATE and have been certified in
2 production for pre-ordering and ordering capabilities, according to Qwest. Qwest also notes that
3 the commercial data is stronger for Arizona than it was for Texas, with a total of ten carriers having
4 achieved production status after testing through SATE. This is a strong indication to the
5 Commission that Qwest's SATE is adequate and 271 compliant.

6 79. For the foregoing reasons, we reject the CLEC's arguments and find that Qwest's
7 SATE is adequate and provides a stable testing environment that mirrors production. To ensure the
8 continued adequacy of Qwest's SATE, we adopt all of HP's and Staff's recommendations
9 discussed later in this report.

10 c. TSD/MTP Compliance Issues

11 80. We have also carefully weighed the arguments of the CLECs regarding instances that
12 they believe CGE&Y sidestepped the requirements of the controlling documents, the MTP and
13 TSD thereby possibly impairing the integrity of the overall testing effort. Here again, we cannot
14 agree with the CLECs. While it was certainly important that CGE&Y carry out the test in
15 accordance with the requirements painstakingly agreed to by the parties, as Test Administrator,
16 CGE&Y was entitled to some discretion to use its professional judgment and experience in carrying
17 out the requirements contained in each of the controlling documents. Nothing in the Comments of
18 the parties, indicates that CGE&Y acted arbitrarily or capriciously in carrying out its
19 responsibilities. At times, it appears that CGE&Y may have been confronted with conflicting
20 requirements and/or objectives and had to choose what in its opinion as Test Administrator
21 constituted the most reasonable interpretation which appeared consistent with the intent of the
22 parties. This is not to say that the Commission agrees with all of CGE&Y's interpretations; but
23 even where disagreements may be present, the subjects at issue are not of such magnitude that they
24 would suggest that Qwest does not meet the underlying requirements for Section 271 approval.

25 81. For instance, we believe that the use of questionnaires was a matter that appropriately
26 fell within the discretion of the Test Administrator. While formal interviews may have been
27 desirable, any adverse consequences of not conducting a formal interview was mitigated by the
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1 following factors. The fact that CGE&Y and the Staff sought to obtain the input of additional
2 CLECs; that CGE&Y conducted informal interviews with CLECs, that CGE&Y was at times
3 contacted by CLECs with problems, and the fact that CGE&Y encouraged CLECs to contact it with
4 any problems they were encountering with Qwest, all suggest that the initial use of questionnaires did
5 not prejudice the outcome of CGE&Y's analysis in this case. Furthermore, the fact that CGE&Y did
6 not examine all of the internal Qwest practices and procedures to determine their adequacy for
7 supporting CLEC relationships is less important than CGE&Y having evaluated the results of those
8 internal practices and procedures upon the CLECs and their ability to compete with Qwest. It is also
9 important that GE&Y did review some of the internal Qwest practices and procedures and that if in
10 evaluating the results of those internal practices, negative findings were made, that this would
11 necessarily flow back to the internal documented practices and procedures of Qwest.

12 82. Overall, we believe that CGE&Y did not act arbitrarily or capriciously in carrying out
13 the requirements of the MTP and TSD. We are satisfied that CGE&Y exercised its professional
14 judgment and discretion in a reasoned and appropriate fashion, and that the instances of
15 noncompliance cited by the CLECs have not prejudiced the outcome of the testing effort or the
16 CLEC's ability to do business in Arizona. The CMP also assures that changes to Qwest's interfaces
17 and systems will be made in a collaborative fashion with appropriate weight given to the CLEC's
18 needs in the future.

19 **B. FUNCTIONALITY TEST**

20 83. CGE&Y concluded that Qwest provides sufficient electronic functions and manual
21 interfaces to allow competing carriers access to all of the necessary OSS functions in Arizona. This
22 conclusion is supported by test activity, observations; performance results; and system, procedural
23 and metric improvements that Qwest has made in response to IWO's generated during the
24 Functionality Test. CGE&Y also concluded that Qwest was providing the CLECs with parity
25 service, when a retail analog was present, or a meaningful opportunity to compete as measured by the
26 benchmarks adopted by the parties.

27

28

1 84. Staff agrees with CGE&Y's findings and conclusions with regard to Qwest's
 2 performance during the Functionality Test. The CLEC's concerns can be classified into three broad
 3 categories all of which Staff believes have now been resolved through retesting or additional testing
 4 by HP or CGE&Y and/or through additional measures recommended by Staff.

5 a. Preorder-to-Order Integration

6 1. CLEC's Position

7 85. Both WorldCom and AT&T argue that the FCC has consistently ruled that pre-order
 8 to order integration⁹ is essential for CLECs to be provided a meaningful opportunity to compete.
 9 WorldCom Comments at p. 23. WorldCom states that HP's evaluation was deficient in that HP only
 10 based its evaluation on Qwest's documented business rules surrounding Electronic Data Interchange
 11 ("EDI") interface preorder to order integration capabilities. WorldCom Comments at p. 25.
 12 WorldCom argues that as demonstrated many times, documented business rules when applied against
 13 Qwest's OSS do not always provide the same results. WorldCom Comments at p. 25. Therefore, the
 14 absence of transaction testing to validate Qwest's documented business rules associated with EDI
 15 preorder to order capabilities is a significant flaw in HP's evaluation of Qwest's preorder to order
 16 integration capabilities. Id.

17 86. AT&T agrees and states that HP conducted a theoretical integration exercise. AT&T
 18 Comments at p. 9. AT&T states that it did not integrate Qwest pre-order query responses into orders
 19 that were submitted to the Qwest OSS for this integration evaluation test, nor did it integrate the data
 20 while it performed testing as the Pseudo-CLEC during the third-party test. AT&T Comments at p. 9.

21 87. Both AT&T and WorldCom also state that insufficient documentation and the need for
 22 meetings with Qwest to understand interface integration requirements only prolong the CLEC's
 23 timeline for establishing working interfaces. WorldCom Comments at p. 26; AT&T Comments at
 24 pp. 8-10. AT&T argues that Qwest makes no documentation available to a CLEC that desires to
 25 determine whether integrating through its systems is a good idea. AT&T Comments at p. 8. AT&T
 26 states that Qwest should make available documentation to CLECs that describe the ways in which

27 ⁹ Preorder to order integration is a term which describes the ability of the CLEC to transfer electronically,
 28 information returned on preorder responses to an order without manipulation.

1 pre-order and order integration can be achieved and the ways in which integration for specific
2 products and ordering scenarios can best be deployed. Id. AT&T also argues that HP found no
3 support from Qwest documentation of business rules that explain what reformatting is required for
4 shortening or lengthening data structures to comport with ordering data specifications. Qwest
5 Comments at p. 9.

6 88. Finally, AT&T argues that HP's analysis was conducted and its conclusions rest on a
7 very limited set of nine transactions. AT&T Comments at p. 8. AT&T argues that the MTP specifies
8 more than 170 ordering scenarios that were to be tested against as many as ten product groups to
9 determine the ability of Qwest's systems to process the transactions, and these scenarios represent the
10 ordering basics only. AT&T Comments at p. 8.

11 89. Both AT&T and WorldCom argue that the Staff has ignored the CLECs' concerns
12 with HP's analysis approach, and findings of insufficient Qwest documentation and discrepancies
13 between Preorder and Order data specifications, such as the fields' lengths, which directly impact the
14 integratability of Preorder and Order data. WorldCom Comments at p. 26.

15 2. Qwest's Position

16 90. Qwest states that the IMA-EDI interface supports integration; however, the degree to
17 which a CLEC chooses to take advantage of pre-order-to-order integration is up to the CLEC itself.
18 Id. Qwest further states that with access to Qwest's documentation and knowledgeable resources
19 CLECs can accomplish a high degree of integration. Qwest Comments at p. 99. Qwest also notes
20 that at Staff's request, HP conducted two separate evaluations of preorder-to-order integration.
21 Qwest Comments at p. 99. Qwest argues that it passed both evaluations. Id. Qwest also states that it
22 meets all FCC requirements in this regard.

23 3. Staff's Position

24 91. Staff relies upon HP's two evaluations which find that pre-order to order integration
25 can be done with the information supplied by Qwest. Staff has requested, however, that Qwest
26 supplement the record with commercial data to demonstrate successful application of pre-order to
27 order integration and parsing by CLECs and for information relating to vendor availability of
28

1 interface components which will allow for the successful application of both pre-order to order
2 integration and parsing by CLECs. Qwest since supplemented the record on April 10, 2003.

3 **b. The Daily Usage Feed**

4 **1. CLEC's Position**

5 92. Both AT&T and WorldCom still have concerns with Qwest's Daily Usage Feed
6 (DUF) records. WorldCom Comments at p. 27; AT&T Comments at pp. 63-69. WorldCom states
7 that the accuracy of Qwest's DUF files is critical to the accuracy of billing – an important OSS
8 component. WorldCom Comments at p. 27. WorldCom argues that Qwest cannot be found to have
9 satisfactorily met its OSS requirements when concerns still exist surrounding the DUF. WorldCom
10 Comments at p.27.

11 93. AT&T argues that CGE&Y's testing of DUF was inadequate. AT&T Comments at
12 p. 63. AT&T notes that while the Functionality Test was conducted from December 2000 to June
13 2001, the Pseudo-CLEC only received the first ADUF records from Qwest in August 2001. AT&T
14 Comments at p. 63. AT&T argues that CGE&Y initially found Qwest's billing systems adequate
15 without verifying any ADUF records. AT&T Comments at p. 64. AT&T further states that
16 thereafter at the direction of Staff CGE&Y conducted limited testing of ADUF which AT&T
17 believes provides no basis for any conclusion that finds that Qwest's provision of ADUF is adequate.
18 AT&T Comments at p. 64.

19 94. The first two supplemental tests conducted by CGE&Y showed serious problems in
20 Qwest's provision of ADUF records. AT&T Comments at pp. 66-67. AT&T further states that
21 because the problems found in the Supplemental DUF tests were so significant and widespread, it is
22 obvious that the Billing Functionality tests were incomplete and the correlation between Friendly
23 User call logs, DUF records and wholesale bills was woefully incomplete. AT&T Comments at
24 p. 68. AT&T states that there has never been an evaluation that an end user local call for the variety
25 of local services and call types, can be verified to appear on a DUF and a wholesale bill consistently
26 and repeatedly. AT&T Comments at p. 68. AT&T states that the test calls must verify two billing
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1 situations: that the calls that are made are recorded and provided to the test CLEC via DUF files,
2 and that they appear appropriately on the bills. Id.

3 **2. Qwest's Position**

4 95. Qwest argues that CGE&Y conducted three DUF tests and that the first two tests
5 uncovered errors that required Qwest to implement system fixes. Qwest Comments at p. 51. Qwest
6 also argues that after performing its third test, CGE&Y documented Qwest returned 100% of the
7 expected DUF messages. Qwest Comments at p. 51. Qwest also relies on its commercial results
8 related to DUF to demonstrate that its performance is satisfactory. Qwest Comments at p. 55. Qwest
9 states that the BI-1A (measures timeliness with which Qwest provides recorded daily usage records
10 for UNEs and Resale) results for the last twelve months show that Qwest provided parity service for
11 ten out of twelve months. Qwest Comments at p. 55. The BI-1B (measures the percent of recorded
12 daily usage for jointly provided switched access provided within four days) results for the same
13 twelve month period show that Qwest has actually surpassed the 95% benchmark every month. Id.

14 **3. Staff's Position**

15 96. Staff believes that Qwest has satisfied this requirement, and that the third evaluation
16 done by CGE&Y demonstrates that Qwest has implemented the necessary system fixes to remedy the
17 original problems encountered with its provision of timely DUF records. Staff has offered a
18 recommendation (in paragraph 148) aimed at ensuring continued compliance by Qwest.

19 **c. Performance Measurement Evaluation**

20 97. Data accuracy assurance was a primary OSS Test objective. This objective was
21 accomplished through a three-stage process: the conduct of a Performance Measurement Evaluation,
22 Functionality Data Reconciliation, and Functionality Test Results Comparison. This three-stage
23 process represents a complete cradle to grave review and validation of Qwest's performance
24 measurement data collection and processing.

25 **1. CLEC's Position**

26 98. Both WorldCom and AT&T argue that it was a fundamental oversight by CGE&Y and
27 the Pseudo-CLEC in failing to appropriately establish the required data elements needed to be
28

1 captured prior to beginning the Functionality Test in order satisfy the TSD Section 7.3.4. WorldCom
2 Comments at p. 35; AT&T Comments at p 39. WorldCom states that as a result, the evaluation falls
3 short of producing the results that would have been obtained if they appropriately applied the
4 requirements contained in the TSD. Comments at p. 35.

5 99. AT&T states that the failure of CGE&Y to verify the Pseudo-CLEC was collecting or
6 obtaining the data demonstrates noncompliance with an exit criteria for the OSS Test. AT&T
7 Comments at p. 39.

8 2. Qwest's Position

9 100. Qwest responds to the CLEC's arguments by stating that because calculating
10 performance results consistent with the PIDs requires more data than what is provided to CLECs,
11 CGE&Y determined that using Qwest ad hoc data was the most appropriate data source for
12 performing this test. Qwest Comments at p. 37. In order to verify that all the data provided by Qwest
13 matched that captured by the Pseudo-CLEC, CGE&Y undertook an extensive Data Reconciliation
14 effort to compare the Qwest and Pseudo-CLEC data. Qwest Comments at p. 37. CGE&Y then
15 produced what it termed a Data Reconciliation Report. CGE&Y also produced a report entitled the
16 Arizona 271 Performance Indicator Definition (PID) Data Element Summary Report version 6.0
17 which documented why Pseudo-CLEC data could not be used alone to perform the calculations.
18 Qwest Comments at p. 39. Moreover, in addition to calculating the Functionality results using Qwest
19 ad hoc data, CGE&Y recalculated the measures presented in Section 2.5 using Pseudo-CLEC data as
20 available. Qwest Comments at p. 39. This effort produced the Functionality Test Results
21 Comparison Report. Id.

22 101. The MTP and TSD required CGE&Y to produce nothing more than the Functionality
23 Performance Measures Test and the Data Reconciliation. However, in order to address the CLEC's
24 concerns, CGE&Y undertook two additional extensive analyses thereby going far beyond what was
25 required.

1 **3. Staff's Position**

2 102. Staff's position is that the approach used by CGE&Y is adequate and the extensive
3 follow-up work done by CGE&Y to ensure data accuracy, should address any concerns that the
4 CLECs may have. While the use of Pseudo-CLEC data would have been preferable in all cases,
5 Qwest did not provide all of the required data elements as a matter of course, and had CGE&Y or HP
6 requested the information, blindness would have been sacrificed, which could have impaired the
7 integrity of the testing effort.

8 **d. The Daily Log Dispute**

9 **1. CLEC's Position**

10 103. AT&T also argues that CGE&Y failed to maintain the Functionality Test daily logs.
11 AT&T Comments at p. 43. AT&T argues that CGE&Y's failure to provide these reports denied the
12 CLECs the requisite information to track the life cycle of an LSR, as the intervening transactions,
13 including supplements, rejection notices, confirmation notices, and status changes, were not
14 provided. AT&T Comments at p. 45.

15 **2. Qwest's Position**

16 104. Qwest argues that the crux of the CLECs' complaints appears to be the form in which
17 the information was provided – a compilation report rather than individual daily reports. Qwest
18 Comments at p. 44. Qwest also states that there was no requirement for CGE&Y to provide any
19 particular content or format. Id.

20
21 **3. Staff's Position**

22 105. Staff believes that CGE&Y supplied all of the necessary information to the CLECs,
23 albeit not as timely or quickly as anticipated. Staff also believes that this test has been one of the
24 most open tests in the country to-date and that information has been shared with the test's participants
25 to an unprecedented degree. Therefore, while the CLECs may not have received the information in
26 the exact form requested or as quickly as desired, the CLECs participating in the Arizona test

1 received much more underlying data and information earlier on in the test than other CLECs in
2 similar 271 testing engagements.

3 **d. Commission Resolution**

4 **1. Preorder to Order Integration**

5
6 106. The record establishes that two reviews of the pre-order to order integration were
7 conducted by HP at the Staff's request. The reviews were apparently done after it was discovered at
8 an interim workshop, that there was a deficiency in this regard and that the Test Administrator had
9 made no findings on the preorder to order integration capabilities of Qwest's interface.¹⁰ HP's later
10 review, at Staff's request, was thus limited to a documentation review. The CLECs have objected to
11 HP's findings given the scope and nature of the underlying review.

12 107. In an attempt to bolster its position, Qwest recently filed the testing results and
13 analysis done by KPMG and HP in the ROC. The ROC test was more transaction based and used
14 more pre-order to order integration than the Arizona test, and utilizes the same Qwest systems.
15 Thus, it unquestionably has relevance and application to Arizona. In addition, Qwest supplied
16 letters from both Telcordia Technologies and NightFire which indicate that the preorder to order
17 integration and parsing capabilities exist and are available to CLECs for use with Qwest's interfaces.

18 108. We find that the additional supplementation of the record by Qwest, corroborates
19 HP's findings that Qwest's application-to-application interfaces allow competing carriers to integrate
20 pre-ordering information into Qwest's ordering interface, and that based upon the letter by
21 NightFire, the capability to parse pre-ordering information into identifiable fields exists.

22 109. As Staff has recommended, we also request Qwest to file any commercial data
23 available to it which would provide further corroboration to HP's findings that Qwest
24 application-to-application interfaces allow competing carriers to integrate pre-ordering information
25 into Qwest's ordering interfaces, and that CLECs have successfully utilized the parsing functionality.

26
27
28 ¹⁰ The interface constructed by HP did not contain the functionality to analyze preorder to order capabilities.

1 110. As for the need for additional documentation, the Commission believes that the CLECs
2 now have the ability to request such documentation through the CMP process.

3 **2. Daily Usage Feed**

4 111. We agree with Staff that sufficient retesting has been done by CGE&Y to demonstrate
5 that Qwest has overcome its initial problems in this area, and through various system fixes is now
6 generating accurate DUF records on a timely basis.

7 112. The CLECs also argue that there has never been an evaluation that addresses all types
8 of end user calls which have been verified to appear on a DUF and a wholesale bill consistently and
9 repeatedly. While Staff had instructed CGE&Y to undertake this type of billing verification, Qwest
10 does not currently offer a detailed billing option for UNE-P. Qwest has represented to Staff that
11 other BOCs, which have obtained Section 271 authority, do not provide this type of detailed billing
12 option either. We note that to the extent this is important to the CLECs, they can again request such
13 an option through the CMP in the future.

14 **c. Performance Measurement Evaluation**

15 113. The Commission agrees with Staff that while ideally Qwest's performance relative to
16 the Pseudo-CLEC would have been determined through direct calculation from Pseudo-CLEC data,
17 not all of the required data elements were being collected by the Pseudo CLEC at the time, thus
18 necessitating CGE&Y's reliance upon Qwest's ad hoc data in some instances. While we agree with
19 the CLECs that CGE&Y should have discussed this with the parties before it apparently did, we do
20 believe that the underlying documents may have been subject to varying interpretations on this point,
21 and that CGE&Y's desire to maintain blindness to preserve the overall integrity of the test was a
22 valid concern.

23 114. We also believe that there are three other important factors present that mitigate any
24 adverse impact on the test findings. First, CGE&Y has since undertaken an extensive effort to verify
25 the data it did use to ensure the integrity of its findings. Second, Liberty Consultants conducted a
26 data verification for the ROC and for Arizona which substantiated CGE&Y's findings. Third,
27

1 commercial data are available in many cases which demonstrates that Qwest is providing parity
2 service or is meeting its benchmarks.

3 **d. The Daily Log Dispute**

4 115. We have difficulty finding that the CLECs have been prejudiced by not receiving the
5 information as soon as expected in some cases, or because it was not in the exact format requested.
6 The record demonstrates that the CLECs had access to underlying information and test data at levels
7 unprecedented in any prior 271 engagement. In addition, the CLECs had access to this information
8 prior to each interim workshop, which was well before conclusion of the test, the time when such
9 information is generally distributed in other 271 testing engagements.

10 **C. RETAIL PARITY**

11 116. In analyzing the results of Phases 1 and 2 of the RPE as well as the results of the
12 reevaluation, CGE&Y concluded that the experience of a CLEC service representative using the
13 various available OSS interfaces is substantially the same as that of a Qwest service representative
14 performing similar activities using internal OSS interfaces. CGE&Y also concluded that Qwest
15 provides CLECs with substantially the same access to its OSS for the purposes of initiating service
16 requests and M&R trouble transactions.

17 117. Staff agrees with CGE&Y's overall conclusion that the RPE shows that the experience
18 of a CLEC service representative using various available OSS interfaces is substantially the same as
19 that of a Qwest service representative performing similar activities using internal OSS interfaces.

20 **1. CLEC's Position**

21 118. WorldCom argues that CGE&Y found disparity in the number of fields and steps
22 required for CLECs using IMA-GUI to complete an order (including pre-order steps) versus Qwest.
23 WorldCom Comments at p. 27. Additionally, the re-evaluation determined that 15% of the fields
24 required for Plain Old Telephone Service were manual entry for CLECs. WorldCom Comments at
25 p. 28. WorldCom disagrees with CGE&Y's conclusion that the Order and Billing Forum (OBF) has
26 set guidelines for resale transaction processing that do not apply to the retail model, and that those
27 guidelines result in additional fields and steps that are not applied to the retail transactions.

1 WorldCom Comments at p. 28. WorldCom believes that CGE&Y should have gone further in its
2 analysis and provided more detail and identified the relevant OBF requirements, described them and
3 determined the number of fields and steps that required by the OBF.

4 119. AT&T and WorldCom also complain about the disparity in response times.
5 WorldCom Comments at p. 29; AT&T Comments at pp. 60-61. WorldCom states that CGE&Y
6 found that there was a statistically significant disparity in response times which it stated was not
7 significant. Id. CGE&Y should be required to explain this finding. WorldCom goes on to argue that
8 CGE&Y excuses deviation in performance due to outside factors such as security infrastructure and
9 back-end systems yet CGE&Y did not quantify, identify and separately test the outside factors.
10 WorldCom Comments at p. 30.

11 120. AT&T states that the average EDI response times exceed GUI response times by
12 almost as much as five minutes, but in no case, less than ten seconds. AT&T comments at p. 60.
13 AT&T also points out that there is a cumulative affect of the increased EDI response time because
14 several pre-order queries are required for any given order, and thus, the delays mount up. AT&T
15 Comments at p. 60. AT&T further states that slower EDI response time discriminates against CLECs
16 processing larger order volumes. AT&T Comments at p. 62. It also argues that the impact of this is
17 that the efficiencies and quicker response times that a large CLEC should gain from using the EDI
18 interface instead of the web-based GUI interface are all but eliminated. AT&T Comments at p. 62.
19 AT&T believes that Qwest has designed its OSS interfaces so that mass market CLECs will face
20 additional discriminatory processes. AT&T Comments at p. 59.

21 121. Finally, WorldCom argues that while CGE&Y performed quantitative, qualitative and
22 timeliness evaluations, it did not explain how it weighted the test results. WorldCom Comments at
23 p. 30. AT&T agrees that a CLEC representative who interacts with a residential end-user for
24 placement of an order to establish new UNE-P service cannot perform the Qwest mandated steps for
25 GUI order placement as quickly or as efficiently as a Qwest retail representative establishing basic
26 residential service via the Qwest retail systems. Id. at p. 51. AT&T states that pre-order queries,
27 which are benchmarked for response time, are part of the overall process, but the order preparation

1 processes are the source of the excessive amounts of time CLEC representatives have to spend in
2 scrolling through order forms, entering the data according to Qwest specifications, paging forward to
3 subsequent screens and more, are burdensome and discriminatory. Comments at p. 53. The result,
4 according to AT&T, is that Qwest has designed its OSS interface and GUI procedures to be more
5 onerous for CLECs than the procedures necessary for its own representatives to effect orders for local
6 services. AT&T Comments at p. 51.

7 122. WorldCom's remaining concerns relate to timely updating of the customer service
8 records, CLECs ability to reserve large blocks of telephone numbers at parity; and Qwest initiated
9 changes to CLECs accounts.

10 123. AT&T also argues that CGE&Y failed to compare the edit and error checking
11 processes required by Section 4.1 of the TSD which provides that CGE&Y is to answer the following
12 question: "Are the edit and error checking capabilities available to CLECs using the IMA-GUI and
13 EDI interfaces to create orders substantially the same to the capabilities of a Qwest customer service
14 representative using the retail interfaces?" CGE&Y only noted that both sides had error checking
15 capabilities but did not evaluate whether the relative edit and error checking capabilities were the
16 same. AT&T Comments at p. 15. AT&T also used an example where Qwest's system generated
17 fifty-three lines of single-spaced error messages, none of which identify the reason that the order was
18 rejected. AT&T Comments at p. 16. AT&T states that the Qwest error messages are confusing and
19 fail to indicate exactly what problem Qwest's systems encountered in processing the order. Id.
20 AT&T states that the Commission should direct an evaluation of the comparability of the retail versus
21 CLEC edit and error checking processes, since there is no basis upon which to rely on CGE&Y's
22 declarations. AT&T Comments at p. 17.

23 124. AT&T argues that CGE&Y failed to determine whether equivalent capabilities exist
24 for determining order status. AT&T Comments at p. 17. In its retesting activities, CGE&Y
25 requested the status of five orders via IMA GUI, and to obtain the retail experience, received from
26 Qwest an order status report for one order in its system. AT&T Comments at p. 18. The testing is
27 supposed to determine whether the service representatives have substantially the same abilities to

1 query the Qwest systems using the separate interfaces. CGE&Y looked only at the results and did
2 not observe and monitor the Pseudo-CLEC and Qwest representatives using their respective GUI
3 systems to determine whether the processes are equivalent in methods, interactive steps, and results.

4 AT&T Comments at p. 18.

5 125. AT&T argues that CGE&Y failed to determine whether CLECs can expedite due
6 dates in manners equivalent to Qwest retail. AT&T Comments at p. 19. CGE&Y only determined
7 that a telephone call was required for both CLEC and Qwest customer service representatives in order
8 to obtain expedited due dates. AT&T Comments at p. 19. CGE&Y made no findings or conclusions
9 on the relative abilities to expedite a due date once a telephone call is made to the respective centers.
10 AT&T Comments at p. 19. Except for one retail request for a quicker due date that was honored, all
11 of the retail requests were not accepted. AT&T Comments at p. 20.

12 126. AT&T argues that CGE&Y's findings of retail parity for maintenance and repair
13 functions are based on an OSS interface that has not existed for more than a year. AT&T Comments
14 at p. 47. Since no CLEC can use the IMA GUI M&R interface, the continued claim that Qwest
15 provides equivalent access for purposes of entering, tracking, and closing trouble tickets is
16 misleading, at best. AT&T Comments at p. 48.

17 **2. Qwest's Position**

18 127. Qwest states that the RPE is the only test of its kind in the country. Qwest Comments
19 at p. 56. Qwest also states that from its inception, the RPE was intended to be an order of magnitude
20 comparison to determine whether the necessary and acknowledged differences between Qwest's
21 internal systems and the interfaces by which it provides CLECs access to those interfaces result in
22 any practical difference to a customer calling in for service. Qwest Comments at p. 56. The RPE
23 was to be accomplished through qualitative and quantitative analyses, with an emphasis on the
24 qualitative aspects. Id.

25 128. Qwest argues that the overarching focus of the RPE is on the experience which the
26 customer has while on the line with a CLEC representative, in comparison to the experience of a
27 customer while on the line with a Qwest representative. Qwest Comments at p. 58. The RPE was

1 always intended to be a high level comparison, as contrasted with the very detailed mathematical and
2 statistical methodology employed in other portions of the OSS Test, such as the Functionality Test
3 and the Performance Measurement Audit. Qwest Comments at pp. 58-59.

4 129. Qwest argues that the Retail Parity re-evaluation test scripts contain screen prints from
5 the Retail Parity reevaluation of the edit or error messages received in the IMA-GUI. Qwest
6 Comments at p. 63. The Functionality scripts that were evaluated as part of the re-test and in support
7 of the RPE contain screen prints of the edit or error messages received in IMA. Id. These documents
8 were used by CGE&Y to conclude that the edit and error checking capabilities of IMA-GUI are
9 sufficient for the resale representative to identify and correct any errors on a LSR.

10 130. During the Retail Parity re-evaluation, CGE&Y determined that resale representatives
11 do not call the same telephone number to reserve large blocks of TNs as the retail representatives.
12 The resale representatives receive the requested TNs via FAX, while the retail representatives receive
13 the TNS during the call. The times ranged from 23 minutes to 1 hour and 10 minutes from the time
14 the call was placed to the ISC until the fax was received. Id. As a result of CGE&Y's evaluation,
15 Qwest improved the CLEC process for obtaining large blocks of telephone numbers. The CLEC is
16 now given the option of holding while the Qwest Wholesale Interconnection Service Center contacts
17 the Qwest Network Software Assignment Center to obtain the telephone numbers. After the numbers
18 have been obtained from the NSAC, the CLEC is then given the option of receiving the telephone
19 numbers via fax, via e-mail or verbally on the same call. Id.

20 131. With regard to the ability to query the status of a pending service order, Qwest states
21 that the Retail Parity re-evaluation test scripts contained detailed instructions, results and screen
22 prints from the Retail Parity re-evaluation. Qwest Comments at p. 65. The RPE test scripts contain a
23 description of the events supporting the query to status a pending order. Id. As a result of the
24 Functionality re-test and the Retail Parity re-evaluation, CGE&Y found that the statuses returned
25 were clear concise messages to inform the Pseudo-CLEC what stage the order was in. Qwest
26 Comments at p. 65.

1 132. Qwest also argues that the ability to expedite due dates is substantially the same
2 opportunity provided to the Pseudo-CLEC Service Representative and the Qwest Service
3 Representative to expedite due dates. Qwest Comments at p. 65. CGE&Y evaluated the ability to
4 expedite due dates in the Retail Parity re-evaluation. The Retail Parity re-evaluation test scripts
5 contain detailed instructions, results and screen prints. Id. The test scripts contain a description of
6 the events supporting the process to expedite due dates. The results of CGE&Y's Functionality re-
7 test and the Retail Parity re-evaluation, was a conclusion by CGE&Y that the process to request an
8 expedited due date is substantially the same for the resale representative and the retail representative.
9 Qwest Comments at p. 66.

10 133. With regard to response times, it was agreed to use the results of the Capacity Test
11 determine whether Qwest's pre-order response times are meeting the negotiated benchmarks in PO-1.
12 Qwest Comments at p. 68. Qwest states that it is meeting the benchmarks even under the heavy
13 volumes in the Capacity Test. Id.

14 134. Finally, as to AT&T's claim that the Retail Parity test evaluated Qwest's obsolete,
15 GUI maintenance and repair system, Qwest noted that while CEMR replaced the IMA-GUI
16 maintenance and repair system in December 2000, the TAG agreed that CEMR would be tested as
17 part of the Functionality Test, but would not be evaluated as part of the Retail Parity Test. CEMR
18 was tested by CGE&Y in the Functionality test. Qwest Comments at p. 71.

19 **3. Staff's Position**

20 135. Staff supports CGE&Y's findings relative to the Retail Parity Test. Staff also
21 recommends adoption by the Commission of all related recommendations by Staff and its
22 consultants.

23 **4. Commission Resolution**

24 136. The record demonstrates that the Retail Parity Evaluation is unique to Arizona and that
25 it was a more subjective evaluation than many of the other evaluations undertaken which perhaps
26 explains why disagreements with the Test Administrator's findings and conclusions are prevalent
27 with this test than any other.

1 137. We believe that it is important to underscore a point made by both the Staff and
2 Qwest. The RPE was always intended to be an "order of magnitude" comparison to determine
3 whether the necessary and acknowledged differences between Qwest's internal systems and the
4 interfaces by which it provides CLECs access to those interfaces result in any practical difference to a
5 customer calling in for service. We believe that some of the CLEC's arguments attempt to place
6 more weight on one side of the equation than the other, depending upon the result which is not
7 appropriate. Overall, however, the Commission agrees with Staff that CGE&Y appropriately
8 balanced both qualitative and quantitative factors in concluding that the experience of a CLEC
9 representative's customer is not substantially different than that of a Qwest representative's customer.

10 138. Some of the complaints lodged by the CLECs appear to have been remedied in the
11 retesting process or with additional testing. The relative edit and error checking capabilities of
12 CLECs versus Qwest was the subject of additional testing by CGE&Y. The ability to query the
13 status of a pending service order, was the subject of additional testing by CGE&Y during the
14 Functionality Re-Test and the Retail Parity Re-evaluation. The ability to expedite due dates was the
15 subject of additional evaluation in the Retail Parity re-test. The process for CLECs to reserve large
16 blocks of TNs was improved by Qwest when CGE&Y determined that resale representatives do not
17 call the same telephone number to reserve large blocks of TNS as the retail representatives.

18 139. Other concerns of the CLECs regarding response times and Qwest's maintenance and
19 repair system, CEMR, were evaluated in other portions of the test, including the Capacity Test and
20 Functionality respectively.

21 **D. CAPACITY TEST**

22 140. CGE&Y concluded that Qwest's OSS are capable of processing forecasted volumes
23 up to 12 months in the future while maintaining a level of performance well within the established
24 benchmarks. CGE&Y also concluded that for System Scalability, Qwest has well documented
25 processes and procedures in place to maintain system capacity sufficient to meet projected future
26 loads. CGE&Y also concluded that for Staff Scalability, Qwest maintains adequate forecasting
27 procedures to identify the need for additional work force within a sufficient time frame to allow for
28

1 appropriate training and placement.

2 **1. CLEC's Position**

3 141. AT&T argues that CGE&Y failed to properly evaluate CLEC actual experience in
4 receiving EDI Pre-Order Responses in contrast to Qwest reported IRTM results. AT&T Comments
5 at p. 37. AT&T states that the EDI preorder response time results reflect a significant disparity
6 between actual usage and IRTM-reported usage, with a general pattern of actual usage being
7 considerably and consistently slower than reported by IRTM. AT&T Comments at p. 37. AT&T
8 also argues that CGE&Y failed to account for missing and lengthy EDI preorder responses. AT&T
9 Comments at p. 42.

10 **2. Qwest's Position**

11 142. Qwest notes that CGE&Y's conclusion that IRTM is an adequate tool for gauging pre-
12 order response times is supported by the evidence presented during the analysis of the Capacity Test.
13 Qwest Comments at p. 81. Despite this, the CLECs continued to complain that Qwest should be
14 forced to replace IRTM with a system that captures EDI response time information at the Qwest
15 Interactive Agent. Id. Staff ultimately ruled that, in line with industry trends, Qwest should be
16 required to capture results at the Interactive Agent. Qwest Comments at p. 82. Qwest states that
17 Staff's ruling did not impugn the use of IRTM, but rather set up an interim system of dual reporting
18 for a period of 18 months during which time the differences between these sources of data will be
19 examined, and a decision made regarding which data will be used going forward. Id.

20 **3. Staff's Position**

21 143. Staff believes that with the Staff's recent impasse resolution on the use of IRTM, the
22 CLEC's concerns are resolved regarding the accuracy of IRTM as a measurement tool.

23 **d. Commission Resolution**

24 144. The Commission concurs with Staff on this issue.

25 **E. CGE&Y/HP AND STAFF RECOMMENDATIONS**

26 145. The following recommendations by Staff and its consultants will ensure continued
27 compliance by Qwest in the future with its 271 obligations and therefore shall be adopted:

1 **1. CGE&Y Recommendations**

2 (a) CGE&Y Recommendation No. 2: CGE&Y recommends
3 that Qwest should develop a process to seek and receive
4 approval from a CLEC before performing any changes to a
5 CLEC-owned account. Currently, Qwest-initiated
6 activities are shown as "Completions" on a Loss and
7 Completion Report, but little detail is provided, causing
8 undue confusion. Implementation of this recommendation
9 may provide an opportunity for Qwest to improve the
10 quality and value of the Loss and Completion Report that
11 Qwest provides to CLECs. Notification to a CLEC
12 indicating that Qwest-initiated changes have been made
13 would potentially facilitate the reconciliation of the Loss
14 and Completion Report. This recommendation was
15 developed to address the issue of late notification of order
16 completion on the loss and Completion Report, and is
17 discussed further in AZIWO2115. This issue is an
18 appropriate candidate for review by the CMP.

19 (b) CGE&Y Recommendation No. 3: CGE&Y recommends
20 that Qwest explore the inclusion of additional edits of
21 CLEC LSRs, within the Business Process Layer (BPL) of
22 the gateway systems, prior to issuance of a FOC. This
23 recommendation suggests that increased edits in Qwest
24 gateway OSS would likely result in lowered initial LSR
25 rejection rates, improved CLEC order processing, and the
26 reduction of rejects after a FOC. This issue was initially
27 discussed in AZIWO2116, and Qwest has implemented
28 improvements.

29 (c) CGE&Y Recommendation No. 4: CGE&Y recommends
30 that when Qwest introduces a new product or service that
31 could impact a CLEC account, the appropriate OSS and
32 process changes are communicated to the appropriate
33 Qwest departments or workcenters. This recommendation
34 suggests that Qwest implement process improvements that
35 would result in a more efficient update of system tables and
36 better communication to work centers which would help
37 ensure efficient processing of CLEC orders. This issue is
38 discussed in AZIWO1134, which allows CLECs to take
39 advantage of new and revised product offerings more
40 expeditiously. It is also discussed in AZIWO1127, which
41 refers to software changes that were made outside of a
42 scheduled IMA release that were not communicated to the
43 CLECs.

44 (d) CGE&Y Recommendation No. 5: CGE&Y recommends
45 that, through the CMP, Qwest improve the timeliness of
46 record updates from Qwest's provisioning systems to the
47 various downstream OSS in regard to customer conversions
48 wherever such improvements have not already been put in
49 place. Delays in downstream record updates can

1 potentially add additional setups to CLECs' business
 2 processes. This recommendation is based on AZIWO2060,
 which is discussed on page 77 of this report.

3 (e) CGE&Y Recommendation No. 6: CGE&Y recommends
 4 that, through the CMP, Qwest consider the following
 process improvements:

5 (1) Provide the CLECs with a complete listing of the
 6 services and features on any CLEC-initiated order, as
 7 entered in Qwest's Service Order Processor (SOP). This
 8 recommendation should apply for any CLEC order type,
 9 whether flow-through or non-flow-through. This recap
 10 should include information such as Universal Service Order
 Codes (USOCs), Field Identifiers (FIDS), Hunting
 Sequence, etc. This suggestion calls for the Service and
 Equipment (S&E) section of the Service Order to be
 returned to the CLEC as entered in the Qwest SOP. This is
 currently under evaluation by the CMP forum. _

11 (2) Explore and develop an automated process that
 12 would allow CLECs to view the status of service orders
 13 initiated by Qwest on CLEC-owned accounts. This
 14 recommendation suggests that CLECs be provided with the
 opportunity to view orders, determine the status of orders,
 and monitor the progress of those orders through the Qwest
 OSS so that CLECs can more effectively support the needs
 of their end users.

15 (3) Continue to improve the Service Interval Guide
 16 (SIG) to provide clearer and more detailed information for
 17 CLECs on disconnect intervals, and to make the
 information easier to locate on the Qwest wholesale
 website.

18 (f) CGE&Y Recommendation No. 7: CGE&Y recommends
 19 that Qwest provide CLECs a 45-claendar day advance
 20 notice of final EDI design documentation. This
 21 recommendation simply suggests that Qwest conform to
 the timelines for issuance of EDI design documents, as
 22 presented by the CMP Redesign Team. The basis for this
 recommendation can be found in Section 5.6.4 of the
 Relationship Management Evaluation section of CGE&Y's
 Report.

23 (g) CGE&Y Recommendation No. 8: CGE&Y recommends
 24 that Qwest update their wholesale website with clear
 25 standards and business rules pertaining to CLECs' use of
 the FOC. These standards/business rules should clearly
 26 articulate how a CLEC is to differentiate between FOC,
 Jeopardy notice, Reject notices, and any/all other notifiers.
 27 CGE&Y also recommends that Qwest publish standard
 error-handling information and provide it to CLECs on the
 28 wholesale website in a table format. This would include
 more detailed information on Non-Fatal and Fatal errors,

1 making the wholesale website a more detailed and
 2 complete reference point for CLECs. Although the Qwest
 3 White Paper, "Firm Order Confirmation Evaluation
 4 Results," dated August 6, 2001 provides guidance, the
 5 continued development of reference material to assist the
 6 CLECs in distinguishing and preventing errors would
 7 benefit all parties. The issue of distinguishing error
 8 messages is also discussed in the Arizona Section 271
 9 Performance Indicator Definitions (PID) Data Elements
 10 Summary Report (see Appendix R of CGE&Y's Final
 11 Report), specifically in the HP Missing Functionality Data
 12 Elements Spreadsheet.

- 7 (h) CGE&Y Recommendation No. 9: CGE&Y recommends
 8 that Qwest improve the process for CLECs to reserve large
 9 blocks of NTs. The reservation of large blocks of TNs is
 10 currently a manual process for CLECs. A process
 11 improvement, through mechanization or other means,
 12 would be most beneficial to CLECs when servicing
 13 Business customers. The basis for this recommendation is
 14 discussed in Section 3.1.4.3 of the Retail Parity Evaluation
 15 section of CGE&Y's report (see No. 6 in the table) and in
 16 Data Request 192.

13 **2. HP Recommendations**

14 146. HP's recommendations from its initial SATE Summary Evaluation Report are as
 15 follows:

- 16 (a) Qwest submit a plan to ensure that it meets CLEC needs for
 17 testing of all products available in Arizona, including new
 18 technologies.
- 19 (b) Qwest implement a quality assurance process and a release
 20 management practice specifically for the SATE documentation.
 21 At a minimum, this should specifically address the Data
 22 Documents and the Production Errors List.
- 23 (c) To ensure continued adequacy of the SATE, HP recommended:
 24 (1) That Qwest clearly and specifically identify the roles
 25 and responsibilities of each individual and organization
 26 involved in the SATE. This definition of roles and
 27 responsibilities should include goals and objectives and
 28 mission statements for each organization and for all
 personnel. In addition, the job description for each
 employee should be clearly defined.
- (2) That Qwest develop a system of internal controls to
 ensure accountability for organizations and individuals
 involved in the SATE process. These controls should
 use clearly defined goals and objectives and should tie
 specifically to functional responsibility, such as quality

1 of documentation, accuracy of test account data, mirror
 2 image of production, etc. Employees involved in the
 3 SATE should be encouraged to accomplish these goals
 and objectives.

4 (3) That Qwest develop process flow documentation that
 5 accurately reflects actual SATE processes and is a
 reliable guide to CLECs using the SATE.

6 (d) Qwest publish a list of variances between SATE and
 7 production business edits to ensure that CLECs are fully aware
 8 of any such discrepancies so that a CLEC may effectively
 9 develop their business processes in this 'simulated'
 environment. This list should be concentrated into a single
 document, and become a permanent part of the SATE
 documentation library.

10 (e) Qwest formally incorporate the SATE into the CMP process,
 11 and future changes and modifications should be subject to that
 12 process and that Qwest develop a permanent, formalized
 13 method of obtaining CLEC input and identifying current and
 14 future SATE requirements in connection with the CMP
 process. This process should proactively seek CLEC
 evaluation of the SATE process, suggestions for improvement,
 and forecasts for testing requirement's. HP also recommends
 that Qwest obtain input from the CLECs to determine the full
 suite of products that shall be included in the SATE.

15 (f) Qwest develop a formal process by which the SATE will be
 16 available for new release testing on an ongoing basis.

17 (g) To ensure that the SATE is adequate for full release testing, HP
 18 recommends that IMA SATE release 9.0 be tested. This
 release is expected to take place February 2002.

19 (h) A SATE performance standard be developed for Arizona that
 20 addresses the need for Qwest to demonstrate that the SATE
 21 remains an adequate mirror image of production as OSS
 22 systems evolve. In reviewing this standard, the ACC may wish
 to consider the nature and volume of transactions that are
 executed in production. HP did submit a recommendation for
 PO-19 to the TAG for consideration on 12/18/2001.

23 (i) Qwest file with the ACC an implementation plan for the above
 24 recommendations, which includes specific deliverables,
 25 milestones, and dates, no later than December 31, 2001.

26 147. HP's recommendations from the SATE New Release Test
 Summary report (9.0) are as follows:

27 (a) All issues that have a status of "Closed-Unresolved" or
 28 "Open" as of the distribution of HP's Report are

1 incorporated into the SATE User Group and CMP process.

- 2 (b) Supporting documentation be provided to more clearly
3 clarify the calculations and measurement process of PID
4 PO-19.
- 5 (c) Qwest should consider asking CLECs to submit data
6 requests for negative scenarios and BPL edits for key
7 transactions. Qwest provide a clearly defined process to
8 ensure timely resolution of production mirror issues
9 encountered by CLECs during post SATE certification.
- 10 (d) Qwest include scenarios in data document reflecting all
11 business rule changes identified in the New Release change
12 summary documentation.

13 **3. Staff Recommendations**

14 148. Staff's recommendations are as follows:

- 15 (a) Qwest should assess system improvements for reducing the
16 IMA-GUI input steps required by CLEC's. This effort
17 should be conducted in conjunction with other system
18 changes.
- 19 (b) Qwest should agree to provide CLECs the ability to request
20 ad-hoc data for performance measurement calculations for
21 PIDs contained in the PAP. This would provide the most
22 effective method for auditing the performance results
23 provided by Qwest.
- 24 (c) Qwest should test its Daily Usage File (DUF) provisioning
25 to CLECs to ensure accurate and timely delivery of these
26 records. This test should be conducted within 12 months
27 and be conducted with Staff oversight.
- 28 (d) The ACC should initiate a proceeding to develop and
implement Wholesale Service Standards for Qwest.

149. Staff's additional SATE recommendations are as follows:

- 22 (e) Qwest should immediately enhance the range of
23 capabilities available in SATE to provide for negative
24 testing by CLECs.
- 25 (f) Qwest should file a report on a quarterly basis which
26 indicates the extent of progress made on implementing
27 HP's and Staff's recommendations.
- 28 (g) Qwest should immediately implement HP's
recommendation that it publish a single document that is
maintained throughout the life of SATE as the IMA-EDI
production and SATE environments are updated. HP

1 recommended that this single document be inclusive of
 2 SATE Legacy and BPL Error Codes and Production vs.
 3 SATE differences. This document will provide a CLEC
 4 with a single location to review the details regarding all
 error codes and variances that exist between SATE
 according to the schedule suggested by Qwest of twice per
 EDI Release at a minimum.

5 150. Staff supports the findings and conclusions reached by its Test
 6 Administrator, CGE&Y, in its Qwest CMP Re-Design Evaluation dated March 25, 2002,
 7 and recommends that the Commission adopt it.

8 151. Staff also recommends the following:

- 9 a. Qwest should continue to submit a monthly report on the status of
 10 its change management process Re-Design.
- 11 b. Qwest should develop a report on the effectiveness of the Re-
 12 Designed Change Management Process. This report should include
 13 but not be limited to: a listing of CRs submitted and the submitting
 14 party, a listing of Qwest v. CLEC CRs submitted; a listing of the
 15 issues escalated and those taken to dispute resolution and the
 16 resolution reached, summary of the disposition of all system,
 17 product and process changes, status report on CLEC requested
 18 changes, and the proportion of CLEC changes to ILEC changes to
 OSS systems, products and process ultimately reflected in each
 release. It will report on the effectiveness of the interim processes
 for each Qwest release and whether the processes are working as
 anticipated. This report should be furnished to the ACC on a
 quarterly basis.
- 19 c. Qwest should immediately submit a verification filing which more
 20 fully demonstrates its compliance with all of the processes and
 21 procedures set forth in its Master Red-Lined CLEC-Qwest CMP
 22 Re-Design Framework since implementation of the various
 processes and procedures. Any variances should be accompanied
 with an explanation for the discrepancy.
- 23 d. Qwest should be required to submit verification that it has updated
 24 its PCAT and Technical Publications so that they are all consistent
 25 with the Statement of Generally Available Terms and Conditions
 (SGAT). To the extent there is no timeframe for such updates in
 26 the SGAT, Staff recommends that Qwest include a timeframe for
 changes in the future.
- 27 e. Qwest and the CLECs should incorporate into the Master Red-
 28 Lined Agreement express provision for participation by State

1 Commissions in the process which gives the Commission Staffs an
2 opportunity to offer input into the process, without any binding
3 effect on the respective Commission should a dispute later arise
4 which is taken to the Commission for resolution.

5 152. Staff deems the OSS Test portion of Qwest's Section 271 initiative to be complete
6 conditioned upon Qwest's agreement to implement the recommendations of Staff and its consultants
7 set forth above and subject to the Commission's resolution of the OSS issues raised in the July, 2002
8 supplemental workshop. While none of these recommendations must be implemented prior to
9 approval of Qwest's application, we do believe they are important to ensure the continued adequacy
10 of Qwest's systems and that it continue to be Section 271 compliant. In Staff's opinion, all the
11 objectives of implementing a comprehensive independent Third Party administered OSS Test have
12 been fulfilled. Staff's believes the record compiled during the course of the OSS Test program will
13 demonstrate to the ACC, the DOJ and the FCC, an appropriate degree of Qwest's operational
14 readiness, performance, and capacity to provide access to preordering, ordering, provisioning, repair
15 and maintenance, and billing OSS functionality to CLECs in Arizona. The Commission anticipates
16 that process improvements will continue, and that follow-up requirements on selected issues (e.g.,
17 CMP, SATE and emerging services) can be suitably monitored and addressed through supplemental
18 filings and the recommendations set forth above.

19 153. Commercial data, reported by Qwest on a monthly basis, reinforces Staff's opinion as
20 to Qwest's compliance. This type of data reflects Qwest's actual performance in providing service to
21 CLECs. Based on the "Results" data for the last twelve months through February 2002, Qwest is
22 providing parity service to CLECs when there is a retail analog and is meeting agreed upon
23 benchmarks in other instances, thereby affording the CLECs a meaningful opportunity to compete.
24 Staff acknowledges the significant improvement that Qwest has made in service delivery to CLECs,
25 and recommends that the Commission find that Qwest satisfies §271 requirements relative to its OSS.

26 154. In addition to enhancements that have been demonstrated through quantitative
27 measure, significant qualitative changes have been realized as well. Qwest's relationship with the
28 CLECs at the outset of the OSS test was unresponsive, with decisions being made unilaterally by

1 Qwest, and CLEC interests marginalized. Now, as demonstrated through the Relationship
2 Management Evaluation, Qwest works well with CLECs and is responsive to their needs.

3 155. Therefore, Staff recommends that the Commission consider that Qwest's OSS Test
4 results meet FCC requirements and that Qwest's Section 271 relief application be granted favorable
5 consideration, relative to the OSS Test, provided Qwest agrees to implement the recommendations
6 listed above and subject to the Commission's resolution of the OSS issues raised in the July, 2002
7 supplemental workshop. In Staff's opinion, Qwest has made comprehensive OSS and process
8 enhancements to the benefit of the CLECs during the OSS Test. Collectively, resolution of problems
9 encountered at the inception of the program and incorporation of wide-ranging improvements during
10 the course of the three-year program have transformed Qwest's processes from many that were
11 problematic and were inadequate for Section 271 compliance, into a consistent set of processes which
12 now fulfills criteria for Section 271 relief.

13 CONCLUSIONS OF LAW

14 1. Qwest is a public service corporation within the meaning of Article XV of the
15 Arizona Constitution and A.R.S. Sections 40-281 and 40-282 and the Arizona Corporation
16 Commission has jurisdiction over Qwest.

17 2. Qwest is a Bell Operating Company as defined in 47 U.S.C. §153(a)(35)(B) and
18 subject to the prohibitions and permissions contained in 47 U.S.C. §271 that expressly pertain to Bell
19 Operating Companies.

20 3. Qwest has sufficiently demonstrated before this Commission that it satisfies all
21 requirements, relative to OSS Testing, and results thereof, specified by the Federal Communications
22 Commission for Section 271 applicants in CC Docket No. T-00000A-97-0238, subject to
23 Commission resolution of the OSS issues raised in the supplemental July, 2002 workshop.

24 4. Therefore, this Commission recommends that the FCC give considerable weight to
25 this Commission's findings that Qwest meets existing OSS Test requirements, subject to Commission
26 resolution of the OSS issues raised in the supplemental July, 2002 workshop.

ORDER

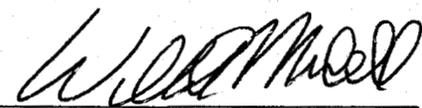
IT IS THEREFORE ORDERED that the Checklist Item 2 Supplemental Report on Qwest's Compliance with OSS requirements dated May 1, 2002, is hereby adopted.

IT IS FURTHER ORDERED that the Supplemental Report on Qwest's Change Management Process and Stand-Alone Test environment dated May 7, 2002, is hereby adopted.

IT IS FURTHER ORDERED that Qwest shall immediately implement the recommendations contained in Findings of Fact 145, 146, 147, 148, 149, 150 and 151 and provide the Commission with quarterly status reports on its progress.

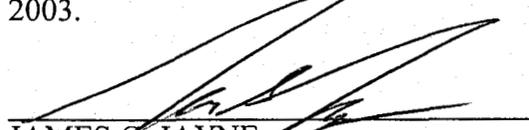
IT IS FURTHER ORDERED that this Decision shall become effective immediately.

BY ORDER OF THE ARIZONA CORPORATION COMMISSION.

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| CHAIRMAN | COMMISSIONER | COMMISSIONER |

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IN WITNESS WHEREOF, I, JAMES G. JAYNE, Interim Executive Secretary of the Arizona Corporation Commission, have hereunto set my hand and caused the official seal of the Commission to be affixed at the Capitol, in the city of Phoenix, this 28th day of August, 2003.



JAMES G. JAYNE
INTERIM EXECUTIVE SECRETARY

DISSENT _____
MAS:vrk