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JUL 17 9 53 AM '97

DOCUMENT CONTROL

July 16, 1997

U-0000-97-069

Cox Arizona Telcom, Inc.:
Local Number Portability Implementation

Dear Del:

In response to the Commission's June 26, 1997 Memorandum concerning "Local Number Portability Implementation," Cox Arizona Telcom, Inc. submits the enclosed information.

If you have any questions, please contact Richard Smith at 510/923-6220 or me.

Sincerely,

Michael W. Patten

Del Smith, Utilities Consultant
Arizona Corporation Commission
Utilities Division
1200 West Washington
Phoenix, Arizona 85007

MWP:djj
Enclosure

Original and ten (10) copies
hand-delivered to:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Arizona Corporation Commission
DOCKETED

JUL 17 1997

DOCKETED BY

Del Smith

-2-

July 16, 1997

Copy with enclosure to:

Mr. Richard Smith
Director, Regulatory Affairs
Cox Arizona Telcom, Inc.
2200 Powell Street, Suite 865
Emeryville, California 94608

Intraoffice copy with enclosure
to Mr. Smith

PHOENIX MSA U S West Communications, Inc.			
WIRE CENTER NAME	CLLI	HOST CLLI	LNP BY 5/15/98
SUNRISE	AGFIAZSRDSO	AGFIAZSRDSO	MEDIUM
BEARDSLEY	BRDSAZMADSO	BRDSAZMADSO	HIGH
CIRCLE CITY	CRCYAZMARS1	BRDSAZMADSO	MEDIUM
CHANDLER MAIN	CHNDAZMADSO	CHNDAZMADSO	HIGH
OCOTILLO	CHNDAZRSRS1	CHNDAZMADSO	HIGH
GALVESTON	CHNDAZSLRS2	CHNDAZSODSO	HIGH
CHANDLER SOUTH	CHNDAZSODSO	CHNDAZSODSO	HIGH
CHANDLER WEST	CHNDAZWEDSO	CHNDAZWEDSO	HIGH
ARIZONA CITY	AZCYAZ03RS1	CSGRAZMADSO	LOW
COOLIDGE	CLDGAZMARS1	CSGRAZMADSO	LOW
ELOY	ELOYAZ01RS1	CSGRAZMADSO	LOW
FLORANCE	FLRNAZMARS1	CSGRAZMADSO	LOW
MARICOPA	MRCPAZMARS1	CSGRAZMADSO	LOW
STANDFIELD	STFDAZMARS1	CSGRAZMADSO	LOW
CASA GRANDE	CSGRAZMADS1	CSGRAZMADS1	LOW
DEER VALLEY	DRVYAZNODSO	DRVYAZNODSO	HIGH
NEW RIVER	NWRVAZMARS1	DRVYAZNODSO	HIGH
WICKENBURG	WCBGAZMARS1	DRVYAZNODSO	HIGH
FORT MCDOWELL	FTMDAZMADSO	FTMDAZMADSO	LOW
GDYR-COLDWATER	GDYRAZCWDSO	GDYRAZCWDSO	MEDIUM
BUCKEYE	BCKYAZMARS1	GDYRAZCWDSO	MEDIUM
WINTERSBURG	WNBGAZ01RS1	GDYRAZCWDSO	MEDIUM
GLENDALE	GLDLAZMACG0	GLDLAZMACG0	MEDIUM
HIGLEY	HGLYAZMADSO	HGLYAZMADSO	HIGH
HIGLEY QUEEN CREEK	HGLYAZQCDSO	HGLYAZQCDSO	HIGH
MESA GILBERT	MESAAZ0IDS0	MESAAZGIDS0	HIGH
MESA MAIN	MESAAZMADSO	MESAAZMADSO	HIGH
PHNX FOOTHILL	PHNXAZ81DS0	PHNXAZ81DS0	MEDIUM

WIRE CENTER NAME	CLLI	HOST CLLI	LNP BY 5/15/98
BETHANY WEST	PHNXAZBWDS0	PHNXAZBWDS0	HIGH
LITCHFIELD PARK	LTPKAZMARS1	PHNXAZBWDS0	HIGH
TOLLESON	TLSNAZMARS1	PHNXAZBWDS0	HIGH
WHITE TANKS	WHTKAZMARS2	PHNXAZBWDS0	MEDIUM
PHNX CACTUS	PHNXAZCADS0	PHNXAZCADS0	HIGH
PHOENIX EAST	PHNXAZEACG0	PHNXAZEACG0	HIGH
PHOENIX GREENWAY	PHNXAZGRCG0	PHNXAZGRDS0	HIGH
PHNX GREENWAY	PHNXAZGRDS0	PHNXAZGRCG0	HIGH
PHNX LAVEEN	PHNXAZLVDS0	PHNXAZLVDS0	HIGH
PHNX MA LATA TDM	PHNXAZMA01T	PHNXAZMA01T	HIGH
PHNX MA LATA TDM	PHNXAZMA04T	PHNXAZMA04T	HIGH
PINNACLE PEAK	PRVYAZPPDS0	PRVYAZPPDS0	HIGH
PHNX MAIN DSI	PHNXAZMADS1	PHNXAZMADS1	HIGH
PHNX NORTH ISDN	PHNXAZNORS0	PHNXAZMADS1	HIGH
PHNX MAIN	PHNXAZMADS4	PHNXAZMADS4	HIGH
PHOENIX MIDRIVERS	PHNXAZMRCG0	PHNXAZMRCG0	MEDIUM
PHOENIX MARYVALE	PHNXAZMYCG0	PHNXAZMYCG0	MEDIUM
PHNX NORTHEAST	PHNXAZNEDS0	PHNXAZNEDS0	HIGH
PHNX NORTH	PHNXAZNODS1	PHNXAZNODS1	HIGH
PHOENIX EAST	PHNXAZEARS1	PHNXAZNODS1	HIGH
PHNX NORTHWEST ISDN	PHNXAZNWRS1	PHNXAZNODS1	HIGH
PHNX WEST ISDN	PHNXAZWERS1	PHNXAZNODS1	HIGH
SUNNYSLOPE DUNLAP	PHNXAZ93RS1	PHNXAZNODS1	HIGH
PHNX NORTH ACD	PHNXAZNODS2	PHNXAZNODS2	HIGH
PHNX NORTH	PHNXAZNODS3	PHNXAZNODS3	HIGH
PHOENIX NORTHWEST	PHNXAZNWCG0	PHNXAZNWCG0	HIGH
PHNX FECOS	PHNXAZPPDS0	PHNXAZPPDS0	HIGH
PHOENIX PEORIA	PHNXAZPRCG0	PHNXAZPRCG0	HIGH
PHOENIX SOUTHEAST	PHNXAZSECG0	PHNXAZSECG0	HIGH
PHOENIX SOUTH	PHNXAZSOCG0	PHNXAZSOCG0	HIGH

WIRE CENTER NAME	CLLI	HOST CLLI	LNP BY 5/15/98
PHOENIX SUNNYSLOPE	PHNXAZSYCGO	PHNXAZSYCGO	HIGH
PHOENIX WEST	PHNXAZWECGO	PHNXAZWECGO	HIGH
SCOTTSDALE MAIN	SCDLAZMADSO	SCDLAZMADSO	HIGH
SCOTTSDALE SHEA	SCDLAZSHDSO	SCDLAZSHDSO	HIGH
CAVE CREEK	CVCKAZMARS1	SCDLAZSHDSO	HIGH
RIO VERDE	FTMDAZNORS1	SCDLAZSHDSO	HIGH
SCOTTSDALE THUNDERBIRD	SCDLAZTHDSO	SCDLAZTHDSO	HIGH
SAN MANUEL DSO	SNMNAZMADSO	SNMNAZMADSO	LOW
DUDLEVILLE	DDVLAZMARS1	SNMNAZMADSO	LOW
HAYDEN	HYDNAZMARS1	SNMNAZMADSO	LOW
KEARNY	KRNYAZMARS1	SNMNAZMADSO	LOW
MAMMOTH	MMTHAZMARS1	SNMNAZMADSO	LOW
ORACLE	ORCLAZMARS1	SNMNAZMADSO	LOW
SUPERSTITION EAST	SPRSAZEADSO	SPRSAZEADSO	MEDIUM
SUPERIOR	SPRRAZMARS1	SPRSAZEADSO	MEDIUM
SUPERSTITION MAIN	SPRSAZMACGO	SPRSAZMACGO	HIGH
SUPERSTITION WEST	SPRSAZWECGO	SPRSAZWECGO	HIGH
TEMPE MAIN	TEMPAZMADSO	TEMPAMADSO	HIGH
TEMPE MCCLINTOCK	TEMPAZMCCGO	TEMPAZMCCGO	HIGH
TEMPE MCCLINTOCK	TEMPAZMCDSO	TEMPAZMCDSO	HIGH
WHITLOW	WHTLAZMADSO	WHTLAZMADSO	LOW
WHITLOW	WHTLAZMADSO	WHTLAZMADSO	LOW
CORONADO	CRNDAZMADS1	CRNDAZMADS1	LOW
<u>Accipiter Communications, Inc.</u>			
LAKE PLEASANT	PEORAZZFIKD	PEORAZZFIKD	LOW
<u>Arizona Telephone Company</u>			
HARQUAHALA	HRVYAZXCDSO	HRVYAZXCDSO	LOW
HYDER	HYDRAZCXDSO	HYDRAZCXDSO	LOW
ROOSEVELT LAKE	RSVTAZXCDSO	RSVTAZXCDSO	LOW

WIRE CENTER NAME	CLLI	HOST CLLI	LNP 3rd Qtr 1998
MARANA WEST	MARNAZ02RS1	TCSNAZFWDS0	LOW
MARANA SOUTH	MARNAZ03RS1	TCSNAZFWDS0	LOW
MARANA MAIN	MARNAZMARS1	TCSNAZFWDS0	LOW
TCSN WEST	TCSNAZWERS1	TCSNAZFWDS0	LOW
TCSN MAIN	TCSNAZMA04T	TCSNAZMA04T	LOW
TUCSON MAIN	TCSNAZMADS1	TCSNAZMADS1	LOW
TUCSON MOUNT LEMMON	TCSNAZMLRS2	TCSNAZMADS1	LOW
TUCSON NORTH	TCSNAZNOCG0	TCSNAZNOCG0	LOW
TUCSON RINCON	TCSNAZRNCG0	TCSNAZRNCG0	LOW
TUCSON SOUTH	TCSNAZSOCG0	TCSNAZSOCG0	LOW
TCSN SOUTHWEST	TCSNAZSWDS0	TCSNAZSWDS0	LOW
TCSN SHERIDAN	TCSNAZRMRS1	TCSNAZSWDS0	LOW
TCSN CARDINAL	TCSNAZRURS1	TCSNAZSWDS0	LOW
TCSN SOUTHEAST	TCSNAZSERS3	TCSNAZSWDS0	LOW
TCSN SOUTHEAST	TCSNAZSERS4	TCSNAZSWDS0	LOW
VAIL NORTH	VAILAZNORS1	TCSNAZSWDS0	LOW
WILCOX	WLCKAZMARS1	TCSNAZSWDS0	LOW
TUCSON TANQUE VERDE	TCSNAZTVDS0	TCSNAZTVDS0	LOW
VAIL SOUTH	VAILAZSODS0	VAILAZSODS0	LOW
TUCSON NORTH	TCSNAZNODS0	TCSNAZNODS0	LOW
TUCSON RINCON	TCSNAZRNRS1	TCSNAZMADS1	LOW
TUCSON EAST	TCSNAZEARS1	TCSNAZMADS1	LOW
TUCSON SOUTH	TCSNAZSORO0	TCSNAZFWDS0	LOW
<u>Arizona Telephone Company</u>			
SASABE	SASBAZXCD00	SASBAZXCD00	LOW
<u>Midvale Telephone Exchange, Inc.</u>			
CASCABEL	CSELAZXCD00	CSELAZXCD00	LOW
<u>Table Top Telephone Company</u>			
AJO	AJOAZXCDS0	AJOAZXCDS0	LOW

Jasmin T. Espy
Director
MCI Account Team
Carrier Market

USWEST

November 30, 1997

Via Facsimile and U S Postal Service

Dale P. Tucker
Senior Manager - Carrier Agreements
707 17th Street, Suite 4200
Denver, Colorado 80202

RE: Assertion of U S WEST (USWC) Failure to Provision Interim Number Portability (INP) Services in Arizona.

Dear Mr. Tucker:

This letter is in response to your letter of November 10, 1997, regarding specific issues associated with INP. I concur with your position that failure to implement INP properly can negatively impact our mutual customers. However, the facts do not support your position that USWC is completely responsible for the issues you are referencing. The following is a factual representation of the issues associated with the examples you presented, according to USWC source documentation:

- Sierra Sonoma - The first issue you allege is that USWC did not respond to MCI's request of an INP cut for 10/10/97. USWC has documentation from MCI that on 10/6/97, an order was rejected for inaccurate information. On the morning of 10/9/97, a corrected order was submitted to USWC and a Firm Order Confirmation (FOC) was provided to MCI the following day at 2:41PM with a due date of 10/13/97 at 5:00AM. As a result of the time frames associated with the receipt of a correct order and the respective FOC, it is unreasonable to expect a cut on the same date of the FOC, without at minimum, a notification and request of an expedited due date. The facts do not support this position. Your next assertion is that USWC did not FOC the order until "...approximately 5:00PM on the 10th", therefore implying MCI did not have an opportunity to respond to the FOC date/time until "MCI discovered the FOC on Saturday, Oct. 11th". USWC has documentation that supports a facsimile was distributed to MCI at 2:41PM on 10/10/97. It would appear MCI had an appropriate opportunity to work through any issue with the date/time of cut before close of business of the same day.

As for the call to USWC on Saturday, 10/11/97, the management team, (see escalation list provided to William Pitcher on 9/2/97, pursuant to contractual requirements), associated with the INP provisioning process was **not** notified of this issue. Therefore, it is difficult to manage a provisioning order/issue if MCI contacts a department or management representative that is not associated with the provisioning process of the order in question. In addition to the above, you failed to highlight MCI's failure to specify four(4) additional lines for this customer that were not originally ordered. USWC accepted a call from Mark Kruger, MCI, on 10/13/97 and worked diligently to ensure the four(4) numbers in question were ported on the same date as the primary cut - 10/13/97. It would appear our people worked together as a team to ensure the customer needs were addressed.

- Domino's Franchise - USWC received a request from MCI to cancel the order on 10/24/97. Due to human error, an inadvertent mistake resulted in the original order implemented on the requested date of 10/30/97. USWC was notified at 11:00AM on 10/30/97 by Sue Walsh, MCI, of the service issue. At 12:26PM of the same day, service was physically restored, with voice mail confirmation to Sue Walsh at 12:50PM. It appears there was an unfortunate service interruption, however, pursuant to Part A, Section 42.3.2 - USWC cooperated with MCI, upon notification, to "limit the service outage for the ported subscriber". While not downplaying the significance of the service outage, it should be highlighted that MCI and USWC personnel worked collectively to minimize the service issue in an effective and timely manner, on behalf of our mutual customer.
- Domino's Franchise - This particular scenario was unique. Our records indicate that "Jeff", identifying himself as the end-user, called repair requesting a transfer of calls be implemented in lieu of the RCF function. It appears there may have been confusion with this customer as to what service process was implemented by MCI. As a result of the customer confusion and complaint, USWC attempted in good faith to meet the needs of our confused mutual customer, **as is done when MCI customer representatives escalate through our repair process today.** In addition to the confusion associated with the end-user's call to repair, there appeared to be negotiations between this customer and another service provider, which may have added to the confusion of what service the customer perceived they should have had during this period of time. It would appear a lack of communications existed between MCI and this end-user.
- Yee Desmond Schroeder - Your assessment is correct. Human error allowed the 15 paths to be implemented as 1, therefore creating a traffic restriction.
- Oiland Safety - This migration required two(2) physical orders through our system to perform the work required. One order failed as a result of human error, therefore allowing the service to be inadvertently disconnected.
- RCP dba Oasis - On 10/27/97, USWC completed the order as requested. The service was ordered incorrectly by MCI and was subsequently resubmitted by MCI on 10/28/97 for redesign. USWC reissued the orders as requested. However, as a result of a problem in the order issuance process, the order was distributed incorrectly. It appears USWC attempted to mitigate the issue by implementing an internal "verbal" correction for the FOC date of 10/31/97 on the redesign order, with appropriate internal paper to follow on 11/3/97. However, the subsequent orders impacted the customer's service. Repair received a call on 11/3/97 at approximately 2:00PM, with the customer subsequently notified at 4:30PM of resolution.

I disagree with your attempt to position the above referenced examples as a consistent pattern of USWC failures in providing INP service. As the facts represent here, as well as in previous letters between our two(2) companies, the issues are not always completely one-sided, as you represent them. The issues identified as internal to this corporation appear isolated, at best, and have been addressed with the appropriate management representatives for corrective action, where required.

The reference you cite regarding Section 42.3.2 specific to cooperation between MCI and USWC in limiting service outages is sound. To that point, I believe our teams have worked closely with MCI when a problem is identified to remedy the issue as expeditiously as possible. In response to your reference of Section 3.2.2.5.3 limiting the service interruption to 20 minutes, when the process works correctly, USWC does not perceive the 20 minutes as a concern. When a problem develops, either through human or mechanical error, the issue becomes a recovery process which may not be completed within the timelines of this section. And finally, as for the average duration of service interruptions not to exceed 10 minutes, I must ask for clarification. Are you suggesting the above referenced issues are averaged for contractual compliance measurements, or have you specific data, not represented in your letter, that portrays the overall INP process for Arizona at greater than 10 minutes?

USWC does not accept your position that a consistent pattern is represented here that would support an allegation of material contract breach. This corporation is committed to working collectively with MCI to identify and resolve potential issues as they are presented. I would submit that if MCI placed a greater emphasis on working together in the process and operation forums, rather than in a negative letter writing campaign, we could potentially serve our mutual customers more effectively and efficiently, while working towards a common goal of MCI's successful entry into the competitive local market.

Regards,

Steve Gilday *Per*

Jasmin Espy

cc: Jack Rose, Arizona Corporation Commission
Michael Beach, MCI Telecommunication
Oz Osborn, U S WEST Communications