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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF U S WEST)	DOCKET NO.
COMMUNICATIONS, INC.'S)	T-00000A-97-0238
COMPLIANCE WITH SECTION 271)	
OF THE TELECOMMUNICATIONS)	
ACT OF 1996.)	OSS WORKSHOP
_____)	

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Phoenix, Arizona
September 20, 1999

ARIZONA REPORTING SERVICE, INC.
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By: CAROLYN T. SULLIVAN, RPR

Prepared for:

CORPORATION COMMISSION

ORIGINAL



1 BE IT REMEMBERED that the above-entitled and
2 numbered matter came on regularly to be heard before
3 the Arizona Corporation Commission in Hearing Room 1
4 of said Commission, 1200 West Washington Street,
5 Phoenix, Arizona, commencing at 9:10 a.m., on the 20th
6 day of September, 1999.

7

8 BEFORE: DAVID MOTYCKA, Assistant Director
Utilities Division

9

ATTENDEES:

10

For the Commission Staff:

11

Maureen Scott
12 Mark DiNunzio
Phil Doherty
13 Hagood Bellinger
Del Smith
14 Matt Rowell

15

For U S WEST:

16

Andrew D. Crain
Chuck Steese
17 Dean Buhler
Nancy Lubamersky
18 Lori Simpson
Jane Smith
19 Lynn Notarianni
Paul McDaniel
20 Kelly Newland
Tom Freeberg
21 Michael Williams
Pamela Hedlin

22

23

24

25

1 ATTENDEES:
2 For AT&T:
3 Joan Burke
4 John Finnegan
5 Rick Wolters
6 Mary Tribby
7 Pat van Midde
8 For MCI WorldCom:
9 Carol Beaupre
10 Tom Priday
11 For OnePoint Communications:
12 Jeff Crockett
13 Scott Martin
14 Dick Kolb
15 Kevin Cassidy
16 For Rhythms Links, Inc.:
17 Douglas Hsiao
18 For Telcordia Technologies:
19 John Drager
20 For Residential Utility Consumer Office:
21 Steve Gibelli
22 For GE Information Services:
23 Greg Horodeck
24 For Electric Lightwave, Inc.:
25 Kenneth Wilson
For Colorado PUC:
Gary Klug
Bruce Smith

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ATTENDEES:

For Hewlett Packard:

Loring Brown
Bill Koerner

For SBCN:

Randall Lynch

For Cox Arizona Telcom and e·spire™ Communications:

Michael Patten

For Cox Communications:

Yvonne Gamble

For Salt River Project:

David Daer

CAROLYN T. SULLIVAN
Court Reporter

1 MR. MOTYCKA: Good morning, everybody.

2 Again, my name is David Motycka. I'm with the
3 Utilities Division of the Corporation Commission.

4 Let me go over a couple items. Rather than
5 going around the room as we did last time to introduce
6 ourselves, it will be apparent as we go and discuss
7 some of these topics. For the record, when you are
8 getting up to speak, if you could state your name and
9 the company you're with for the court reporter every
10 time you get up and speak so the court reporter has an
11 exact document so that there is no question about who
12 it is that's speaking. That would be either on an
13 issue that you're asking questions of another party or
14 on an issue that you're presenting.

15 In addition, please feel free to get up if
16 you need to. The restrooms are right out here. I had
17 passed out a few extra agendas for you that may not
18 have seen them. And if there is a need to take
19 additional breaks, let me know.

20 First, what I want to do before I turn this
21 over to one of the DCI consultants is to go through
22 some collaborative test expectations. The purpose of
23 this meeting is predominantly to discuss the draft
24 test plan to gather everyone's input.

25 We have received written comments. They were

1 docketed sometime during the day on Friday.
2 Hopefully, everyone has their copies. If need be, if
3 someone needs additional copies, we will do our best
4 to furnish them.

5 In addition, we will be putting up the Master
6 Test Plan on the screen for reference if you want to
7 refer to a specific page or topic as we go along the
8 discussion. I think they're labeled 1 through 12 or
9 something like that. But they all have bulleted
10 items.

11 The Commission order established three
12 workshops over the next 90 days, and that was an order
13 that was rendered back in July to facilitate a
14 collaborative process to determine OSS standards to
15 satisfy 271 requirements. This collaborative process
16 includes third-party testing. Other jurisdictions
17 have initiated third-party OSS tests. New York, which
18 was not a collaborative process; Texas was
19 collaborative. Other states are under way in varying
20 approaches.

21 Arizona will be collaborative. Steps have
22 been taken to demonstrate that intent. The Master
23 Test Plan was distributed for everyone to read and to
24 submit both written comments and the filed comments
25 which were filed on Friday. It includes test

1 scenarios and performance measures. In addition, we
2 have issued -- Commission Staff has issued a request
3 for proposal to get bids on the outside consultant.
4 If there is somebody here that would like a copy of
5 the RFP, they are on the left-hand corner of the
6 commissioners' desk over here for those of you who
7 would like to see one.

8 Collaborative basically means to work
9 together toward a common goal and to be cooperative
10 and constructive in the process.

11 Both the CLECs and U S WEST have a congruent
12 goal. The CLECs want to serve customers in Arizona --
13 I'm sorry -- in U S WEST's service territory
14 effectively and efficiently. U S WEST wants to offer
15 long distance in the marketplace. To do so, U S WEST
16 must satisfy 14 requirements and pass the OSS test.
17 It is their burden to prove their case.

18 What we want to do is conduct a prudent test
19 that is reasonable, fair, unbiased; set the bar high,
20 raise the bar when appropriate, lower the bar when
21 appropriate. That all hinges on everyone's
22 participation. We need to utilize all of our skills
23 collaboratively to ensure a prudent test.

24 The Commission Staff will set a proper
25 environment and make clearly just decisions. This

1 will be talked about later, but we would like to
2 establish a Test Oversight Committee, which was
3 brought up in quite a few comments. Some of you
4 referred to them as a Test Advisory Group. That will
5 be discussed later on in the day relative to how
6 that's going to work. We would hope that the CLECs
7 apply some of the lessons learned in other
8 jurisdictions. We would anticipate for U S WEST to
9 resolve all the issues promptly and accurately.

10 DCI, Doherty & Company, we have Phil Doherty
11 and Hagood Bellinger here. They are Staff's
12 consultants. They have worked on OSS before, OSS and
13 performance measures, competitive and technical
14 expertise. Staff has been using them in preparation
15 of these meetings as well as in preparation of the
16 Master Test Plan.

17 Today's objectives are to get all the OSS
18 issues on the table, resolve them and reach agreement,
19 if possible, or document them for Commission Staff to
20 review and see if they need to be incorporated in the
21 Master Test Plan.

22 In the third workshop scheduled for September
23 30th and October 1st, the objectives would be to
24 determine performance measures and assign values,
25 reach agreement on them, if possible, or document them

1 for Commission decision.

2 With the achievement of the workshop goals,
3 we can initiate OSS testing on a solid, single-minded
4 basis.

5 The overall OSS test objectives include:
6 Determine if U S WEST's OSS offer parity to CLECs'
7 where there is a basis for comparison. Otherwise,
8 determine if U S WEST's OSS offer reasonable access to
9 information and a fair chance to compete.

10 If the answer is no to either of the
11 questions that I just mentioned, they have to identify
12 the problem. We need to identify the problem and have
13 U S WEST establish corrective action. Once U S WEST
14 has established corrective action and achieved the yes
15 answers, they may or may not pass the test.

16 With that, I'd like to turn this over to
17 Mr. Bellinger for a few moments. He was going to
18 speak about some of the comments that were brought up.
19 After Mr. Bellinger is done, we will lead into that
20 part of the agenda. The first item is functionality
21 test discussion.

22 What I would ask the parties to do is for
23 those companies that would like to present any changes
24 that they have or recommendations to the test plan to
25 please speak. Again, state your name. If there is

1 not a microphone near you or one that can be passed to
2 you, you will need to use the podium. The reason for
3 that is people are calling in on the listen line.
4 They want to hear what's going on. They cannot hear
5 unless you use the microphone. Any questions?

6 (No response.)

7 MR. MOTYCKA: If you have any written
8 statements that are prepared in advance, if you could
9 give the court reporter those written statements so
10 she can incorporate those in the file, that would be
11 appreciated.

12 One other thing. There is a sign-up sheet
13 outside. That will be delivered to the court reporter
14 as well. We will make copies for those individuals
15 that would like a copy. I would ask that you include
16 your electronic mail address or Web site. Once we
17 gather data and we've come to some closure on some of
18 the issues, it is much easier for us to e-mail them
19 out to folks versus fax or mail.

20 MR. BELLINGER: As indicated, we will on the
21 agenda go through and discuss each of the tests
22 individually and hopefully have the companies present
23 which changes they would like to make as we go through
24 each of the tests. But there were several issues that
25 you raised in your comments that we thought we would

1 need to clarify and get out of the way first.

2 The first one actually came up at the last
3 workshop. And so we thought we'd get that one and
4 discuss it first and get it out of the way. It has to
5 do with retesting or issue resolution.

6 That particular one, AT&T recommended on page
7 19 and 20 of their comments that maybe the California
8 Master Test Plan would be one to follow. And I'll
9 read through those. It looked like a more reasonable
10 one to start with.

11 Item No. 1, an interface, system, or process
12 tested by the pseudo-CLEC does not meet objective
13 criteria, standards or expectations.

14 Two, the pseudo-CLEC creates a written
15 exception report describing the issue raised.

16 Three, the exception report is delivered to
17 the third-party consultant, as required.

18 If the exception report affects business
19 rules or interface, it is brought to the advisory
20 board. And as they've indicated, we'll discuss the
21 advisory board later.

22 U S WEST prepares a written response to the
23 exception describing any intended fixes.

24 U S WEST advises the third-party consultant
25 that the fix is complete. The third-party consultant

1 gives the results to the pseudo-CLEC.

2 If the results meet the criteria -- this is
3 No. 7 -- standards, or expectations, then the process
4 is considered complete.

5 If results affect business rules or
6 interface, the third-party consultant informs the
7 technical advisory board.

8 If the applicable criteria have not been met,
9 the process is repeated until the criteria is met.

10 And so we thought we would include that in
11 terms of issue resolution. So any comments on those
12 suggestions and that particular procedure?

13 MR. CRAIN: Andrew Crain from U S WEST. We
14 don't have an objection to having a section like this
15 included in the test plan to discuss or to handle
16 retesting, and the California language looks
17 reasonably close to what I think we need.

18 I would make two suggestions, however. I
19 would suggest that after sentence No. 3, we add a No.
20 4, and everything else becomes 5, 6, 7, that indicates
21 that the ACC and the third-party consultant will
22 decide if the exception is of sufficient importance to
23 merit retesting.

24 I think there are going to be many different
25 flavors and kinds of exceptions -- hopefully none, but

1 in other states, there have been many different favors
2 and kinds of exceptions. Some of them, I think the
3 third-party and the ACC should have the discretion to
4 determine whether or not they are of sufficient
5 importance to merit retesting. If they don't merit
6 retesting, the sentence that's currently No. 5 would
7 still be in place, which says U S WEST prepares a
8 written response to the exception describing any
9 intended fixes. And in the current sentence 6, I
10 would include a clause that starts the sentence to
11 say, if the exception is of sufficient importance to
12 merit retesting.

13 Basically, it would be a two-level way of
14 handling exceptions. For those exceptions that are
15 not deemed important enough to merit retesting, U S
16 WEST will provide a written report and include any
17 intended fixes. The third-party consultant can
18 evaluate that and make any suggestions or determine if
19 it is sufficient.

20 If the exceptions aren't of sufficient nature
21 to merit retesting, then the procedure would follow
22 exactly as the California Master Test Plan sets forth.

23 MR. BELLINGER: Those sound like reasonable
24 additions. I think they should be incorporated to
25 this list.

1 Any objections to those changes?

2 MR. FINNEGAN: This is John Finnegan of AT&T.
3 I might have one suggestion. We had talked -- and
4 maybe this will come up later on about the technical
5 advisory group or technical advisory board. In terms
6 of who would determine whether the test exception was
7 of significance to warrant retesting, I think whatever
8 group, if there is a group formed, should also be
9 involved in that decision, eliminating the decision of
10 the third-party consultant. And the ACC does not have
11 a formal mechanism to getting the input of the CLECs
12 as well as U S WEST, who would also be part of that
13 technical advisory board.

14 So we don't necessarily object to the notion
15 of levels of testing and some exceptions not requiring
16 retesting, but we think in terms of deciding what
17 should be retested or not should have more formalized
18 CLEC and U S WEST input through the technical advisory
19 board.

20 MR. CRAIN: In response to that, U S WEST
21 would -- I think that's a reasonable proposal to the
22 extent it is designed to have the technical advisory
23 board be a formal process for everybody to have input.
24 If we want to have an extra sentence in here talking
25 about input from all members of the -- whatever we

1 call it, technical advisory board, that would be fine,
2 but I think the ultimate decision needs to be made by
3 the third-party consultant and the ACC.

4 MR. FINNEGAN: I don't know if I necessarily
5 agree with that. My understanding of kind of the
6 charter of the technical advisory board would be
7 they're unable to make a decision. The ACC is going
8 to be the ultimate adjudicator. But I think we should
9 give the technical advisory board the shot first at
10 trying to resolve the issue.

11 MR. CRAIN: Obviously, if we can resolve the
12 issue, it wouldn't be going to the ACC.

13 MR. FINNEGAN: I was just responding to your
14 comment that the ACC is ultimately going to decide the
15 issue. That may not be the case if the technical
16 advisory board would resolve the issue.

17 MR. CRAIN: If we want to have a sentence, I
18 think we can draft something that talks about the
19 technical advisory board taking a first crack at it
20 trying to resolve the issue. And then if the issue is
21 not resolved, it goes to the third-party consultant
22 and the ACC. I think we'd be fine with that.

23 MR. BELLINGER: Any other comments on this
24 issue?

25 (No response.)

1 MR. BELLINGER: We'll draft some -- a
2 proposal and maybe bring it up to the next workshop as
3 a final. Or we could distribute it, as well. So
4 we'll do that.

5 Two other issues I wanted to clarify. These
6 are just mostly clarifying issues from some of the
7 companies. There was some confusion about reports
8 that the third-party consultant would prepare. The
9 comment indicated that they would be specifically
10 required reports for the functionality test and the
11 measurement specifically.

12 (An off-the-record discussion ensued.)

13 MR. BELLINGER: Our intent is that the
14 third-party consultant would write a report on all
15 tests and would not be excluding the change
16 management, retail parity, and performance test. All
17 those tests would be included in their final report.
18 And their final report would have write-ups on that
19 test. So there would be no tests excluded in terms of
20 their write-up and findings.

21 Another issue that there seemed to be some
22 confusion about that was raised was about the role of
23 the third-party consultant and the test transaction
24 generator of the pseudo-CLEC. Those are two
25 independent functions. The third-party consultant is

1 to perform the test, evaluate the test, be in charge
2 of running the test, and writing the report. The
3 pseudo-CLEC is a separate function. It could be the
4 same third-party consultant, depending on how the RFP
5 is handled and responded to. And the pseudo-CLEC
6 function is to input orders and to do the capacity
7 test and build an EDI interface and to build a test
8 transaction generator and run those tests.

9 Is there any confusion between these two
10 functions?

11 (No response.)

12 MR. BELLINGER: Anyone have a comment on
13 that?

14 MR. DRAGER: John Drager from Telcordia. At
15 the last meeting, I asked a question and I got
16 answered, but I'd like to ask it again. The
17 pseudo-CLEC test transaction generator is separate
18 from the third-party administrator?

19 MR. BELLINGER: Separate function.

20 MR. DRAGER: The role of the pseudo-CLEC is
21 to execute all of the test cases, including the
22 maintenance test cases. And the tool by which that is
23 done is not -- this is the question: Is the tool
24 developed by -- to implement the maintenance and
25 repair test cases provided by anybody in this room?

1 MR. BELLINGER: No. The pseudo-CLEC would
2 also -- on the repair and maintenance specifically?

3 MR. DRAGER: I'm asking who develops the tool
4 by which the pseudo-CLECs implement it? Is it the
5 BOCs?

6 MR. BELLINGER: The tool, meaning interface.

7 MR. DRAGER: Yes.

8 MR. BELLINGER: The electronic interface
9 would be developed by the pseudo-CLEC.

10 MR. BUHLER: Dean Buhler with U S WEST. IMA
11 supports maintenance and repair. For the EB-TA
12 interface, that, too, has been developed, but U S WEST
13 would suggest that if there's not sufficient CLEC
14 participation with the EB-TA interface, then the
15 third-party would build to that interface using a CMIP
16 protocol.

17 MR. DRAGER: And then my response to that is
18 that's not what was done in California. You're
19 asking, then, the pseudo-CLEC to develop yet another
20 interface. You understand that, and now I understand
21 that. That's not what I understood at the last
22 meeting. In particular, I had thought that one of the
23 CLECs, MCI in particular, could be called upon to
24 execute -- under the auspices of the pseudo-CLEC could
25 be called upon to generate the ticket repair that will

1 be done through the EB-TA interface because I believe
2 they have that interface.

3 MR. BELLINGER: We did not include anything
4 in the test plan assuming that would happen.

5 MR. DRAGER: Yes, that's right, you did not.

6 MR. BELLINGER: And so we don't have -- MCI's
7 not agreed to do that, and I'm not sure that we would
8 -- at this point could do all the testing that would
9 need to be done through their interface. So to make
10 sure, we at this point would like -- the pseudo-CLEC
11 would have to build that interface to complete all
12 testing.

13 To clarify one other point, the pseudo-CLEC
14 would not necessarily input all of the tests if we do
15 get CLEC participation. And perhaps MCI also
16 participating, since they have built an EB-TA
17 interface, that they would do some of the testing as
18 well as the pseudo-CLEC. The pseudo-CLEC would do
19 sufficient testing to complete the overall testing of
20 the master test.

21 MR. DRAGER: It's not clear to me that that
22 is closed in terms of the master test fund. The folks
23 in this room may want to really clear that off. It
24 sounds like it's not quite closed.

25 MS. LUBAMERSKY: Nancy Lubamersky from U S

1 WEST. This is an area that we could work through
2 because the cost and time of rebuilding EB-TA is very,
3 very significant. And obviously, the number of test
4 transactions is not in the tens of thousands or
5 millions. Perhaps there should be consideration of
6 using MCI's interface via some arrangement of payment
7 for that use, some alternative way. If obviously the
8 ACC decides it needs to be done, that can be done, but
9 it's extremely timely.

10 MS. BEAUPRE: Yes, MCI is willing to offer up
11 its EB-TA interface for this testing. However, I'd
12 also like to have documentation added that the
13 third-party consultant will, in fact, evaluate the
14 documentation U S WEST provides for a CLEC to build
15 to.

16 And I'd also like to ask a follow-up question
17 to your statements on the third-party role. I believe
18 MCI WorldCom did have some questions on these areas
19 where it wasn't clear to us who did the actual
20 execution of the test orders. It appears as though
21 the third-party consultant, the pseudo-CLEC, and the
22 CLECs were going to submit the actual orders. And I
23 think MCI WorldCom felt that there would be more
24 documentation, more clarification as to who was
25 actually going to submit the orders and who was going

1 to process the submittal.

2 MR. BELLINGER: To comment on that quickly,
3 the orders will be issued by any participating CLEC
4 and the pseudo-CLEC. They would actually issue the
5 orders. The result of those, the third-party
6 consultant would ask for separate reports and evaluate
7 those results and perhaps monitor some of the inputs
8 as required to make sure that the information was
9 gathered that needed to be gathered for computing the
10 test results and documenting it. But the actual
11 inputting of the orders would be by the CLEC or the
12 pseudo-CLEC. Third-party consultant wouldn't actually
13 input the orders, but they would prepare test
14 documentation and require test reports.

15 MS. BEAUPRE: So it is a fact the
16 anticipation to have two separate companies, one being
17 the third-party consultant, and a separate company
18 being a pseudo-CLEC?

19 MR. BELLINGER: Two separate functions.
20 Could be two separate functions, depending on if the
21 RFP is written that you could respond to both. They
22 are two independent functions, but one company could
23 respond to both. It might be two companies, depending
24 on how the RFP is responded to and how it's awarded.

25 MS. LUBAMERSKY: One other piece of

1 information. It is likely that another or multiple
2 CLECs would be in a position with EB-TA at the time
3 that the testing is due. So in addition to MCI, it is
4 possible that there would be other CLEC or CLECs able
5 to participate in this repair and maintenance effort.

6 MR. BELLINGER: Okay. And I think that the
7 final decision would have to be made at the time the
8 tests are being presented and proposed by the third-
9 party consultant. Can all of the tests be
10 sufficiently run using the MCI and any other CLEC that
11 would participate with their EB-TA interface? If so,
12 then we would not require that to be built. But then
13 I agree with the other comment made by MCI that the
14 documentation should be evaluated by the third-party
15 consultant, a pseudo-CLEC in this case, since we're
16 doing the preparation of the interface for the EDI.
17 They would also be responsible for evaluating the
18 documentation for the EB-TA interface.

19 MS. LUBAMERSKY: We agree.

20 MR. BELLINGER: Any other discussion on this
21 item?

22 (No response.)

23 MR. BELLINGER: We're going to cover two of
24 the items after we go through the test discussion. As
25 indicated by David, we'll talk about the Test Advisory

1 Group after we go through the discussion of the
2 individual test. And also, there was an overall
3 comment about reporting of the progress of the test,
4 and we'll discuss that after we go through test
5 discussions themselves.

6 With that, let's move on to a discussion of
7 the functionality test and ask that anyone that wants
8 to suggest changes to the functionality test that
9 they -- we need a volunteer to start.

10 MR. FINNEGAN: This is John Finnegan, AT&T.
11 I'll start.

12 One of the notions I think we need to get
13 agreement on or at least address is the functionality
14 test need not be limited to only those functions that
15 are performed electronically. Electronic function
16 should, of course, be part of the functionality test.
17 But for those services and processes that are also
18 supported through manual processes, we believe that
19 should also be part of the functionality test and that
20 the absence of electronic support should not
21 disqualify a product or service from consideration in
22 the functionality test and some of the other tests for
23 that matter. I'm wondering if there's any reaction to
24 that notion.

25 MR. BELLINGER: Do you have any specific --

1 MR. FINNEGAN: Well, specific in terms of the
2 services?

3 MR. BELLINGER: Yes.

4 MR. FINNEGAN: Yes, the interconnection --
5 the collocation ordering process, provisioning process
6 is a manual process. We believe that that should be
7 part of the functionality test to evaluate the
8 processes U S WEST has in place to allow CLECs to
9 order collocation.

10 Some of the processes for ordering unbundled
11 network elements and certainly resale services are
12 also supported all or in part by manual processes. We
13 think those services -- the functions or processes
14 that support those services should also be evaluated.

15 MR. BELLINGER: The test plan is a test plan
16 of operation and support systems. And collocation and
17 provisioning, for example, I think is a checklist item
18 that would be looked at under the checklist item.

19 MR. FINNEGAN: In paragraph 133 of the
20 Ameritech Michigan order, the FCC said that they're
21 going to look at how that OSS supports the three modes
22 of entry: interconnection, unbundled network
23 elements, and resale.

24 To the extent that operation support
25 systems -- and I might add that the FCC does not limit

1 the definition of OSS only to the hardware and
2 software. They don't limit it to the bits and bytes
3 that are exchanged. It also includes the personnel
4 and processes, both electronic and manual that are
5 needed to support those three items, interconnection,
6 UNEs, and resale. So we think the guidance the FCC
7 has already provided and shown the manual processes
8 and interconnection should also be part of the OSS
9 framework.

10 MR. BELLINGER: Andy Crain, U S WEST.

11 MR. CRAIN: U S WEST doesn't have a problem
12 with the evaluation of certain manual processes; for
13 example, if an order falls out and it needs to be
14 retyped, how that works. This test needs to be
15 limited to OSS as OSS is traditionally understood.

16 What A T AT&T is suggesting is a huge
17 expansion of the scope of this test. And to have the
18 third-party consultant go in and evaluate everything
19 under collocation and everything under interconnection
20 is not appropriate here. We were hiring the experts
21 on OSS, systems experts come in and determine if our
22 OSS is adequate. To have that third-party consultant
23 also go in and evaluate entire checklist items I think
24 is inappropriate.

25 The Commission will be determining those

1 issues in a hearing. There's no reason to add every
2 issue in a 271 case into this OSS testing.

3 MR. FINNEGAN: This is not an evaluation of
4 the checklist items. There are OSS -- OSS is used to
5 support many of the checklist items. And the test for
6 interconnection as an example would only and should
7 only be limited to the extent that the OSS is used to
8 support those processes. This is not unprecedented.
9 They evaluated the OSS support for collocation in the
10 New York test plan. And I believe we cited some test
11 cases in that New York test plan where there were test
12 cases for collocation that were provided through Bell
13 Atlantic's OSS.

14 So I think if you want to have a complete
15 evaluation and if the ACC is interested in providing
16 as complete a recommendation as possible to the FCC,
17 the FCC is going to be interested in how the OSS that
18 U S WEST provides supports collocation.

19 MR. BELLINGER: Any other comments on this
20 particular issue?

21 MR. CRAIN: It's my understanding that those
22 issues were added to the New York test as a result of
23 the merger terms and conditions of Bell Atlantic with
24 the FCC.

25 I really think and U S WEST firmly believes

1 that the scope of this test should not be drastically
2 increased in the way that AT&T is suggesting. The
3 test is a reasonable test as it currently stands, and
4 it should be limited to basic OSS evaluation.

5 MS. TRIBBY: This is Mary Tribby for AT&T.
6 To just expand on what Mr. Finnegan said a little bit,
7 AT&T is not recommending that a particular checklist
8 item like collocation or interconnection be checked in
9 its entirety. What AT&T is recommending is that the
10 functions that the FCC has clearly identified as OSS
11 functions, preordering/ordering, provisioning,
12 maintenance, repair, and billing, be evaluated for all
13 of the services and elements that U S WEST is required
14 to provide.

15 Now, whether those are provided through
16 manual processes, electronic processes, or partially
17 through both, those should be evaluated. And in the
18 other states, where, as I understand, it the processes
19 were probably less manual for those RBOCs for some
20 things, there may not have been as much manual
21 testing, but I think the ultimate outcome of this test
22 should be looking at the CLEC's experience in
23 preordering/ordering, provisioning, maintenance and
24 repair, and billing, all of these functions,
25 regardless of whether that is done through a manual

1 process, an electronic process, or both. And I think
2 in order to have a complete report, that's just
3 something the test has to take into account.

4 MR. BELLINGER: We would agree with that, and
5 we think the test does that in terms of it identifies
6 the particular scenarios of all of the orders to be
7 input. And those that are to be input if they require
8 manual action, they would be evaluated on that basis.
9 If they require electronic, if they're electronically
10 completed, they're evaluated on that basis. So the
11 manual processes would be evaluated for all of the
12 scenarios included. And we think that list of
13 scenarios covers the services to be provided.

14 MR. FINNEGAN: But I don't think those
15 scenarios cover interconnection or collocation.

16 MR. BELLINGER: No, they do not cover
17 interconnection or collocation.

18 MR. FINNEGAN: And CLECs currently use OSS
19 processes to order those items. U S WEST uses
20 processes, primarily manual, to provision those items.
21 The FCC is interested in the OSS support that's
22 provided to support those items. So I think it's
23 reasonable and if the ACC wants to have a complete
24 record before the FCC, it's a good idea to evaluate
25 those. From what I could tell, it wasn't time

1 consuming and extensive amount of activity to do those
2 test cases. Those test cases seemed fairly routine
3 and fairly basic. It's not talking about massive
4 development of test transaction generators. It's
5 testing of the existing processes U S WEST has in
6 place to see how good they are at allowing CLECs to
7 order collocation and then provision collocation and
8 interconnection, other interconnection activities once
9 that's been done.

10 MR. CRAIN: To add one more legal
11 technicality here, if you read the first report and
12 order on competition of the FCC, the RBOCs are -- all
13 incumbent telephone companies are required to provide
14 access to OSS for preorder/order, maintenance, repair,
15 and billing for unbundled elements and resale.
16 There's no discussion of collocation, no discussion of
17 interconnection in that order. I think I agree with
18 Mr. Bellinger that the list of scenarios here is
19 reasonable. There are certain things that U S WEST
20 will suggest be added, including things like ordering
21 and preorder of DS0-capable loops. This, however,
22 would be such an expansion of the test plan that we
23 cannot support this.

24 MR. FINNEGAN: Let me respond to Mr. Crain.
25 "In determining whether a BOC has met its OSS

1 obligation under section 271, the Commission generally
2 must determine whether the access to OSS functions
3 provided by the BOC to competing carriers sufficiently
4 supports each of the three modes of competitive entry
5 strategies established by the Act: interconnection,
6 unbundled network elements, and services offered for
7 resale."

8 And skipping down, "The OSS functionalities
9 to which Ameritech provides access, as part of its OSS
10 obligations, must support each of the three modes of
11 entry and must not favor one strategy over another."

12 So the FCC recognizes that there are OSS
13 functions that support interconnection in addition to
14 UNEs and retail, and that in determining whether the
15 BOC has met its OSS obligations that an evaluation of
16 the adequacy of that support should be included. So
17 what we're saying is we think it should be included.
18 The FCC appears to be saying that, as well, in the
19 Ameritech Michigan case.

20 From the activities involved in the Master
21 Test Plan in New York, it doesn't look like it's as
22 large a task as Mr. Crain would lead one to believe.
23 I think for the amount of effort involved to do the
24 evaluation, it provides great benefit for the record
25 that would be developed and would allow the ACC to

1 make a better recommendation to the FCC.

2 MR. CRAIN: As one further point, there's no
3 requirement here, no necessity to test absolutely
4 everything. The Commission and Staff needs to
5 determine what's reasonable, what's not reasonable to
6 add to the test. Interconnection is ordered through
7 the exact interface which has been used for years and
8 years on the access side. There's no reason to retest
9 that. There's been huge commercial volume through
10 that interface. And I guess we'd reiterate one more
11 time that we firmly believe that the extent and number
12 of scenarios in the test plan is a reasonable
13 scenario -- or is a reasonable number. They were
14 developed in the Texas workshops in a collaborative
15 process. AT&T is trying to add once again something
16 that they didn't have added down in Texas. Now
17 they're trying to do it here.

18 We just feel that the testing doesn't need to
19 cover everything. Basically the Commission needs to
20 determine what is appropriate for third-party testing
21 and what's appropriate for their decision at a
22 hearing. And we feel that the DCI and the Staff have
23 made a very reasonable determination what that should
24 be.

25 MS. BEAUPRE: Carol Beaupre, MCI WorldCom. A

1 couple comments. I get the sense that there's a
2 couple issues being discussed here.

3 One is to the extent of the automation of the
4 interface. And while I think we're in agreement, I
5 hope that the testing should not be limited to just
6 what is automated. I raise the point to I guess it's
7 my page 20 of the proposed test plan that it
8 identifies those orders that have both complete and
9 partial flow-through. I'd like to make a notation
10 here that this probably ought to be changed to
11 identify these orders that do not flow through. Even
12 though they may come through an automated interface or
13 process manually, I feel this wording should be
14 changed to reflect the manual processing.

15 And secondly, the scope of the services
16 included, MCI WorldCom does agree with AT&T that it's
17 extremely limited. And yes, by virtue of the fact
18 that Texas was limited to two basic services because
19 it was a CLEC and ILEC test where AT&T offered its
20 productive interfaces. So MCI submitted unbundled
21 loop orders with directory listings, while AT&T
22 submitted unbundled network element platform orders.
23 And that was because our interfaces supported just
24 those types of services. In reading this test plan, I
25 find that the directory services are not included

1 here. MCI WorldCom would not propose that additional
2 services like xDSL, directory services, the frame
3 relay be included in this test plan since it is not
4 limited to what the participating CLECs might have as
5 an automated interface.

6 MR. BELLINGER: I think directory services
7 are included in the -- that's part of -- will be
8 evaluated in terms of the services tested. And those
9 various services you're discussing are included except
10 they've already said xDSL will be included. Directory
11 services for unbundled loops would be.

12 MR. FINNEGAN: I think that while there were
13 considerations of directory listings as part of other
14 orders, there were not considerations of stand-alone
15 directory lists. I think Cox brought this out, as
16 well, and it's going to be an issue for FCC whether
17 there are going to be stand-alone orders for directory
18 listings not associated with any other type of
19 service, whether it's retail service or unbundled
20 loop.

21 The test does include considerations of
22 directory listings, but the directory listings
23 considerations are included as other services. There
24 are going to be situations where stand-alone directory
25 listings where an order is just placed only for

1 directory listings for carriers like Cox who are going
2 through a cable, an HFC-type of service. So to echo
3 MCI's comments, I think it would be appropriate to
4 include stand-alone directory listings as part of the
5 test cases to be evaluated.

6 MR. BELLINGER: I would agree that -- I've
7 read the comments, and we hadn't gotten to those, but
8 they had comments concerning LNP, and we would agree
9 to add those particular scenarios for LNP, which I
10 think would take care of that, but we'll check that
11 particular scenario.

12 MR. PATTEN: Michael Patten on behalf of Cox.
13 I think the LNP may address the directory assistance
14 in some instances, but in those instances where it's
15 purely Cox' facilities, we're not transitioning a
16 customer from Cox to U S WEST, the directory
17 assistance stand-alone needs to be covered.

18 MR. CRAIN: From U S WEST's perspective, we
19 have no objective to adding stand-alone directory
20 listings.

21 MR. BELLINGER: We would agree with that.

22 MR. FINNEGAN: I've got another comment.
23 That goes along the lines of the manual processes
24 discussion we had earlier. It appears that current
25 Master Test Plan excludes private line, ISDN, PBX and

1 Centrex services from the scope of the test plan
2 because they're supported through manual processes.
3 Back to my earlier comments, I don't think that in and
4 of itself should be a reason to exclude those services
5 from consideration. If they are provided by manual
6 processes, those manual processes in their entirety
7 should be evaluated as part of the test plan.

8 MS. SCOTT: This is Maureen Scott with the
9 Commission Staff. I just wanted to indicate that
10 where we do not come to closure on a particular issue
11 today, what Staff will do is take into consideration
12 the comments of all parties on that issue, attempt to
13 draft a proposal, and then submit it for discussion at
14 the next workshop. And hopefully we'll be able to
15 come to closure then on all the issues.

16 MR. BELLINGER: Any other comments on these
17 issues?

18 MR. FINNEGAN: Let me ask a procedural
19 question. We had addressed some of these issues in
20 our written comments. Are you just looking for
21 incremental new issues that are not included in the
22 comments or do you want us to talk about what's in our
23 comments, as well?

24 MR. BELLINGER: We would like for you to talk
25 about what's in your comments so we could discuss it

1 openly in the workshop.

2 MR. FINNEGAN: Let me go through a couple of
3 the others on the functionality test. Maintenance and
4 repair for design services was excluded from the
5 Arizona Master Test Plan for the reason that there was
6 no Arizona demand. That doesn't appear to be the
7 case. There has been demand for design services in
8 Arizona and there have been some maintenance and
9 repair activity for design services in Arizona. So we
10 think design services should be included in the
11 maintenance and repair functionality test.

12 MR. BELLINGER: Okay. I think that is a
13 manual process, though. I don't know.

14 MR. FINNEGAN: The maintenance and repair U S
15 WEST alleges can be done for design services through
16 IMA as well as EB-TA. I don't believe U S WEST limits
17 the type of services that can be supported through IMA
18 or their EB-TA interface. I believe they advertise
19 those interfaces to support all services. And if I'm
20 incorrect, help me out.

21 MR. BUHLER: Dean Buhler with U S WEST. IMA
22 supports the creation of trouble tickets and the other
23 maintenance and repair functionality for design
24 services, resale, and unbundled network elements.

25 On the provisioning side, IMA supports ISDN,

1 Centrex, and private line with the capability of
2 transmitting electronically an LSR to U S WEST.
3 Currently we take those and create orders from them.
4 And with the upcoming release that we're targeting, we
5 will have partial order creation for those products as
6 well for some order types.

7 MR. BELLINGER: So are you proposing, then,
8 that you would like to include those in the test?

9 MR. BUHLER: I don't think it's U S WEST's
10 position that we're advocating that. Based on the
11 fact that the Arizona test is a Texas-style test, and
12 those products weren't part of the Texas test, I don't
13 believe that we're advocating that.

14 MR. BELLINGER: Do you have an objection to
15 including them in?

16 MR. CRAIN: We would object to certain things
17 being added to the test that have no current Arizona
18 demand. For example, frame relay. That has been
19 suggested. I believe there were no orders for frame
20 relay in 1998 in Arizona. I don't know what the
21 status is in 1999, but it's my understanding that it's
22 very little or virtually none or none in terms of
23 ordering frame relay. Same thing would go with switch
24 port, analog and digital.

25 It's my understanding that there's very

1 limited demand for design services other than loops.
2 And obviously, loops are being tested, including
3 maintenance and repair of loops in this test plan.

4 There's less than a hundred total circuits or --

5 MS. LUBAMERSKY: Just about a hundred.

6 MR. CRAIN: Just about a hundred total
7 circuits in Arizona for any kind of design services
8 other than loops. We don't feel that it's necessary
9 to add those to the test plan. There are some design
10 services that are already included in the test plan,
11 including loops, and those are being included in
12 maintenance and repair, and that would include DSL-
13 capable loops after it's amended to include that.

14 MR. FINNEGAN: The comments that private
15 line, ISDN, PBX and Centrex should not be excluded, is
16 U S WEST opposing that recommendation or opposing the
17 inclusion of those services in the test?

18 MR. CRAIN: It's our position that the test
19 currently as listed is sufficient for -- the number of
20 scenarios is sufficient. We don't see any reason to
21 expand it to include those issues or these additional
22 items.

23 MS. TRIBBY: This is Mary Tribby with AT&T.
24 I would just recommend that the Commission and the
25 testers consider in putting this test together looking

1 at what CLECs have expressed an interest in going
2 forward, even if those have not currently been
3 ordered, even if this test will probably only be
4 conducted once over a period of months in Arizona.
5 U S WEST's 271 obligations obviously are ongoing and
6 will continue to exist in the future. And I don't
7 think that it makes a whole lot of sense to take a
8 snapshot in time like today and say, because we
9 haven't had any orders for these particular types of
10 services, there's no good reason to include those in
11 the test. I think to the extent that it's reasonably
12 anticipated that CLECs may order particularly the
13 popular types of service, it makes sense for the
14 Commission to include those.

15 MR. BELLINGER: Do you have any specific ones
16 you're most interested in?

17 MR. FINNEGAN: I can bring one up, and I've
18 heard recently unbundled dedicated interoffice
19 transport has been alleged by U S WEST as a service
20 that there's no demand. And hearing from some of the
21 DSL providers, Rhythms, for one, they have attempted
22 to obtain unbundled dedicated interoffice transport as
23 a means of connecting their collocation facilities
24 between one U S WEST end office and a second U S WEST
25 end office.

1 When they attempted to order unbundled
2 dedicated interoffice transport, they found the
3 processes so cumbersome and so inferior to the
4 existing processes for special access circuits that
5 rather than go through the nosebleed of attempting to
6 order through the unbundled dedicated interoffice
7 transport processes, they chose to buy the special
8 access facilities through the -- I don't know if it
9 would be the interstate or the intrastate access
10 tariff, even though the unbundled dedicated
11 interoffice transport was one-third the price.

12 So while there may not be demand for some
13 services, I think we need to look at the underlying
14 reasons for that demand. And I'll be talking about
15 that later in the retail parity test when you compare
16 what's available to customers through the unbundled
17 processes with what's available in the retail
18 processes.

19 MR. BELLINGER: Okay.

20 MS. BEAUPRE: I will also comment on Mr.
21 Crain's comment. In section 2.2, DCI did make a
22 notation here, "Although this is an Arizona test, a
23 mix of customers and volumes representative of the U S
24 WEST 14 state region will be used to test" and so on
25 and so forth of the OSS. And in U S WEST's own

1 testimonies in their 271 application, they do say that
2 their OSS is regional. So therefore, testing all of
3 the services that it offers is reasonable for this
4 type of testing.

5 MR. FINNEGAN: One other service that we talk
6 about in our comments is something called enhanced
7 extended loops, with the attractive acronym EEL. This
8 is a combination of unbundled loop, multiplexing and
9 unbundled dedicated interoffice transport.

10 The FCC in its recent press release on the
11 unbundled network element remand proceeding had talked
12 about a BOC's obligation to provide this service.
13 CLECs are essentially today obtaining these facilities
14 through another name. They're getting them out of the
15 specific access tariff that pretty much does the same
16 thing.

17 Going forward with the FCC's direction, this
18 is going to be a service that CLECs are going to be
19 more and more interested in. It's going to be a
20 larger and larger part of their strategies for serving
21 large business customers. And we think an evaluation
22 of enhanced extended loops should also be included in
23 the Master Test Plan.

24 MR. CRAIN: I guess I have a very strong
25 reaction to this. The FCC, in their press release

1 last week, specifically declined to order the RBOCs
2 and incumbents to provide extended loop. They are
3 issuing that for more comments. They have not made a
4 decision on that. And to say that they have indicated
5 that they're going to order that I think is wrong.

6 The other issue -- or I believe people were
7 bringing up the issue of UDIT, unbundled dedicated
8 interoffice transport, in replacement for access
9 trunks. That is another issue that the FCC
10 specifically declined to address in their 319 order.
11 And they will be issuing a ruling on that in the
12 future, as well.

13 MS. TRIBBY: I would recommend that you folks
14 take a look at that press release. That's not my
15 understanding of the EEL. There were some things that
16 were left open for consideration, but it was my
17 understanding that the EEL was specifically required.

18 Also, Mr. Bellinger, in response to your
19 question, the services that Mr. Finnegan identified,
20 private line, ISDN, PBX, and Centrex, those are
21 services that we think there's a demand for and that
22 those should be included, as well.

23 MR. FINNEGAN: And I've had some press
24 release put in front of me. This is -- it's on my
25 page 5. It's in the summary. Network elements that

1 must be unbundled. Included in that list of network
2 elements that must be unbundled is "An enhanced
3 extended link (EEL) consists of a combination of an
4 unbundled loop, multiplexing/concentrating equipment,
5 and dedicated transport. The EEL allows new entrants
6 to serve customers without having to collocate in
7 every central office in the incumbent's territory."

8 MR. HSIAO: This is Doug Hsiao from Rhythms
9 Links. I think Mr. Crain was mistaken when saying
10 that EEL was not unbundled. In fact, the FCC said
11 that if ILECs want to refuse to provide unbundled
12 switching, they have to provide EEL on a
13 nondiscriminatory basis.

14 MR. CRAIN: There was no order to provide
15 extended link. The FCC specifically put out for
16 comments. "The order does not address whether an
17 incumbent LEC must combine network elements that are
18 not already combined in the network, because that
19 issue is pending before the Eighth Circuit Court of
20 Appeals." That is exactly what we're talking about
21 here, is combining loop and transport that are not
22 combined in the network element.

23 MS. TRIBBY: The paragraph before says,
24 "Pursuant to section 51.315(b) of the Commission's
25 rules, incumbent LECs are required to provide access

1 to combinations of loops, multiplexing/concentrating
2 equipment and dedicated transport if they are
3 currently combined."

4 MR. FINNEGAN: There are a lot of those
5 presently out there. There are a lot of those
6 combinations presently out there, customers being
7 served by that combination. So what we're
8 recommending is that they're being included as test
9 cases, and we've cited to some examples of New York
10 test cases where there's conversion of a special
11 access circuit to a combination of the unbundled loop,
12 multiplexing and dedicated interoffice transport.

13 MR. PATTEN: Mike Patten, this time on behalf
14 of e·spireTM Communications. With regard to no demand
15 for certain services, e·spireTM has arbitrated
16 interconnection agreement for frame relay service with
17 U S WEST. It intends to start providing those
18 services in the immediate future. Even though we may
19 be the first, I doubt that we're the only one. I
20 suspect that other folks will be coming along quickly.

21 MR. BELLINGER: Any other discussion on
22 additional services?

23 MR. STEESE: This is Chuck Steese from U S
24 WEST. And I don't think we should proceed without
25 being devoid of any context here. Just for the

1 purpose of the individuals that were retained to
2 advise the Staff, U S WEST specifically asked every
3 single CLEC in this proceeding for what they needed
4 systemswise in this case, and they objected. And
5 their reaction was, no, we don't have to provide you
6 with any information. And we asked them for details
7 and documents underlying those needs. And for them to
8 now come to the table and tell us, we need all of
9 these items, when we've attempted dutifully to learn
10 what they are, is exactly the concern that we had.

11 We need to make sure that we look at what the
12 CLECs' needs really are and to ignore the past where
13 they've refused to provide this information. And at
14 the same time allow them to just tick off items to try
15 and expand the test plan is what we're concerned
16 about. We don't want this test plan to be expanded
17 beyond that which is really used and necessary here in
18 the state. And that's exactly why the test plan was
19 devised the way it was, we thought.

20 MR. FINNEGAN: One other item. This is a
21 little bit different than the services to be added,
22 but we think the functionality test should include a
23 test of U S WEST's ability to flow through orders.
24 Order flow-through, the ability of a CLEC to send an
25 order to U S WEST and have that order accepted into

1 U S WEST's service order processors without manual
2 intervention, has been difficult to determine what U S
3 WEST means when they say flow-through. They've had
4 various definitions of it. Right now in their
5 upcoming release of IMA, they're alleging that certain
6 types of orders will flow through. I was at an OSS
7 demonstration last week in Minnesota where it sounded
8 like there were orders that will require less manual
9 intervention, not completely devoid of manual
10 intervention. That there may not be retyping of
11 information, but there is a necessary step of typing
12 in additional information in order to have the service
13 orders and the associated service orders be able to be
14 processed successfully through U S WEST's service
15 order processor.

16 So I'll be happy if U S WEST has true FCC-
17 designed flow-through in their next release of IMA.
18 But to be prudent, the functionality test should
19 include a test of whether or not that flow-through
20 actually does happen. And we cited to some sections
21 of the New York test plan where they did do an
22 evaluation of the capability of the orders to flow
23 through.

24 • MR. BELLINGER: It is intended to test that
25 completely.

1 MR. FINNEGAN: That's good.

2 MR. CRAIN: And to clarify one point, U S
3 WEST is having complete flow-through in terms of no
4 person touching the order and manual conversion of the
5 order. There obviously will be some orders that drop
6 out and need some manual assistance just like there
7 are for every incumbent in the country. But there
8 will be -- we are having complete flow-through for
9 loops for most retail and number portability.

10 MR. BELLINGER: But that will be tested
11 thoroughly in the test. What flows through, what
12 doesn't, that will be covered.

13 Why don't we take a break. 15 minutes.

14 (A recess ensued.)

15 MR. MOTYCKA: As you may or may not have
16 noticed, we've moved the podium to over a little bit
17 more in the middle of the room. In addition, during
18 break, we received copies of the sign-in sheets, which
19 are also at the front corner of this desk, for those
20 of you who would like to pick them up. I think the
21 majority of them have addresses and e-mails on them,
22 as well.

23 Why don't we pick up where we left off.

24 MR. FINNEGAN: Just two more comments, and
25 hopefully they'll go more quickly. One thing we think

1 should be part of the test is evaluation of the due
2 date assignment process. There is included in the
3 Master Test Plan as part of the preorder functions the
4 functionality of appointment assignment -- or I forget
5 the exact term, but it has to do with appointment. An
6 appointment is different than a due date. In the U S
7 WEST vernacular, an appointment would be established
8 when a dispatch is required. That's different than a
9 due date. The due date you could have orders where a
10 dispatch is required or not required. It doesn't
11 appear the due date assignment functionality is part
12 of the Master Test Plan. We think it should be
13 included. It looked like from the comments they had
14 made at one point that they believed there would be
15 problems with getting equivalent due date information
16 when the due date is actually provided.

17 MR. BUHLER: Let me just clarify. The Master
18 Test Plan calls for the preorder transactions to be
19 executed, and one of those transactions is for the due
20 date reservation when the dispatch is needed. When
21 the dispatch is not required, it's the standard
22 provisioning interval that then applies. And for
23 those scenarios that would require the standard
24 interval or I suppose if the customer wanted a due
25 date beyond that, that those two would be included in

1 the request and then the firm order confirm that is
2 returned will allow the test to measure whether that
3 standard interval is sufficient. So I believe that
4 philosophically, both pieces are included in the test.

5 MR. BELLINGER: I think it determines whether
6 you need to dispatch it or not. If you don't, you'd
7 have due dates you'd use. If you do, you set the due
8 date according to this appointment.

9 MR. FINNEGAN: That's how the process is
10 supposed to work. It should be the standard
11 installation. Our suspicions, and it seems OnePoint
12 also has that suspicion, is that that's not how the
13 process truly works. Even if there were no dispatch
14 required and the CLEC wanted the standard installation
15 interval, they may not get it.

16 So our recommendation is yes, we understand
17 how the process is supposed to work. It may not work
18 as advertised. And the Master Test Plan, to be
19 prudent, should evaluate how that process works and
20 put to bed the issue of whether CLECs are receiving
21 nondiscriminatory treatment with assignment of these
22 actual due dates. The actual due date is not assigned
23 until the firm order confirmation is assigned by U S
24 WEST. There is no guarantee that that is going to be
25 the standard installation interval, even if that was

1 requested. So let's get it evaluated and find out if
2 the process works as advertised.

3 MR. BELLINGER: The intent would be to
4 evaluate that.

5 MR. FINNEGAN: The other part of the
6 functionality test is U S WEST's ability to send
7 jeopardy notices. When an order is in danger of not
8 being met on the committed-to due date, evaluate the
9 process U S WEST has in place for informing the CLEC
10 of that fact and also to figure out how often U S WEST
11 is going to miss a due date. So we think that should
12 be part of the Master Test Plan, and we've provided
13 some recommendations of the New York Master Test Plan
14 where they've included that test case as part of the
15 evaluation.

16 MS. BEAUPRE: I'd like to add a little
17 footnote to that point. As per jeopardy notification,
18 the draft Master Test Plan does identify that the
19 jeopardy notification is a manual process. It is
20 claimed to be an electronic process in U S WEST's
21 documentation. So I would like to propose that the
22 documentation be changed that this jeopardy
23 notification be included as part of the outbound
24 transactions as an electronic notification.

25 MR. BUHLER: If I could clarify. For both

1 the IMA interface and the EDI interface, the
2 particular information about the jeopardy notice on a
3 single LSR can be transmitted electronically to the
4 CLECs of those interfaces. There is, however, a
5 manual component of that process. It requires a
6 person who is managing that particular LSR to have
7 knowledge of the jeopardy situation and to compose the
8 information and then to trigger the transmittal. So
9 there is an electronic piece and there is a manual
10 piece.

11 U S WEST does not have a jeopardy
12 notification process itself beyond that that I just
13 described. And if so, to included it in the test plan
14 as a process that is -- appears more formal than what
15 exists, I don't think would be a good idea.

16 MS. BEAUPRE: I don't think anybody's
17 disputing the formality or process by which it's
18 generated. I think we've all concluded that the
19 manual processing of orders is included, and I'm
20 assuming that's part of the provisioning OSS function,
21 whether it's manually developed and electronically
22 issued. I think the documentation leads us to believe
23 that is a manually submitted document, i.e., a fax of
24 some sort. And while it was a manual process in
25 Texas, which was the basis for this testing, I think

1 it's different with U S WEST, that it does have an EDI
2 interface for the jeopardy notification.

3 MR. BUHLER: And if I could just add a
4 clarification. If we're talking about the IMA
5 interface, we do have the possibility of e-mailing or
6 faxing through the capability of IMA. So there are
7 CLECs who choose to receive those notices via fax.
8 With EDI, the information is sent back to an EDI
9 transaction, but it's triggered by a human being.

10 MR. FINNEGAN: I'd like to respond to the
11 notion that U S WEST doesn't provide jeopardy notices
12 to its own customers. They may not call it a jeopardy
13 notice, but they provide what is for all intents and
14 purposes a jeopardy notice to their customers quite
15 often. Customers, if they call you and they're asking
16 for the standard interval, they'll be given a due date
17 of the standard interval due date with U S WEST while
18 still on the phone. Probably more often than
19 customers like, through the provisioning process, U S
20 WEST may ultimately find out that there's no
21 facilities available in part of the loop plan, so they
22 will have to call the customer back. And they don't
23 do this in every instance, but quite often, they will
24 call the customer back and say, whoops, we told you
25 it's going to be ready next Thursday. The order's

1 gone held. That's essentially a jeopardy notice. U S
2 WEST is calling to inform them of the fact that they
3 are not going to be able to make good on that due
4 date. It may be an ad hoc process. That notice may
5 not be provided as much as customers would like. But
6 to say that U S WEST never provides jeopardy notices
7 to its customers, I would take exception to that.

8 MR. BUHLER: Dean Buhler with U S WEST. The
9 use of -- whether facilities exist or not, the
10 information is in the Master Test Plan both for CLEC
11 scenarios and retail scenarios. So the use of that
12 information is already part of the test plan.
13 Whatever sort of jeopardy kinds of information that
14 are known to people who are involved in the process
15 are done equally for the CLECs as well as for U S
16 WEST. My point is that there is not a well-defined
17 formalized jeopardy notification process that U S WEST
18 uses for its own customers.

19 MR. CRAIN: This is Andy Crain from U S WEST.
20 I'm really not sure where we are in terms of arguing
21 this issue. On page 16, it indicates that the
22 "systems will generate acknowledgments, error
23 rejections, FOC's, service order completions and
24 manual jeopardy notifications."

25 I guess the only issue right now I believe is

1 whether the term manual should be eliminated. I don't
2 understand how and if the test plan needs to be
3 amended beyond that.

4 MS. BEAUPRE: There's also another section on
5 section 4.3.2 under provisioning the outbound
6 transactions. Order acknowledgments, service order
7 completion reports. But yet jeopardy notification is
8 missing from that list. And so I propose that that
9 jeopardy notification be added to that and that
10 whether it is a manual process or an automated process
11 that jeopardy notifications be included.

12 MS. LUBAMERSKY: What was the reference?

13 MS. BEAUPRE: 4.3.2 under provisioning.

14 MR. BELLINGER: Do you have any comment on
15 that?

16 MR. CRAIN: We don't have any problem with
17 adding jeopardy notification as one of the outbound
18 transactions.

19 MR. BELLINGER: On outbound transactions.
20 Good.

21 MS. VAN MIDDE: I do have a comment in
22 response to a comment made by Mr. Crain. My name is
23 Pat vanMidde. I'm with AT&T. What I'd like to do is
24 have the Commission reference back to its Decision No.
25 59421, which has to do with U S WEST's quality of

1 service tariff. And on December 4th, 1995, U S WEST
2 signed a settlement agreement with this Commission,
3 and included in that was a formal process for customer
4 notification for jeopardies. It's included in section
5 in their tariff 5.2.2. And instead of -- and let me
6 read from this. It says, "Instead of mandating that
7 customers be notified in writing that service will not
8 be supplied within the time frames outlined in its
9 section 12.2, the amended tariff will allow verbal
10 verification and notification. However, if verbal
11 notification is used, U S WEST must ensure that all
12 information required in section 5.2.2 is supplied and
13 that written confirmation is given to the customer as
14 soon as possible."

15 If what it is that U S WEST is doing is
16 providing their customers with notification, isn't
17 that what the CLECs want?

18 MR. CRAIN: I think we've resolved the issue.
19 Jeopardy notices will be included as one of the
20 outbound transactions. I don't know whether or not
21 we're fighting now about the definition of formal and
22 informal. We do have a process to notify people of
23 held orders. I think we've resolved what needs to be
24 in the test plan here. And unless there's a further
25 issue to be addressed, I guess U S WEST is comfortable

1 with the way this is now addressed in the test plan.

2 MR. BELLINGER: Any other comments on -- I
3 think they've addressed this.

4 MR. HSIAO: This is Doug Hsiao from Rhythms.
5 In our comments we addressed the fact that we don't
6 think that the test plan addresses whether the time
7 interval when you receive the jeopardy notification is
8 measured by the test plan. If it's in there, great.
9 But we would like to have some notification of when
10 prior to the due date is the jeopardy notification
11 actually given to the CLEC.

12 MR. BELLINGER: Would you clarify that
13 slightly. You said the time --

14 MR. HSIAO: What's important to us is that
15 when we roll the truck that we get the jeopardy
16 notification several days in front of the anticipated
17 due date. And I think at this point all we're trying
18 to measure is whether the jeopardy notification is
19 given or not. And we would like to clarify at what
20 point the jeopardy notification is given to the CLEC.

21 MR. CRAIN: I guess from U S WEST's
22 standpoint, I would imagine that in the functionality
23 test, that would be provided. Obviously, we don't
24 know that a jeopardy exists on the day, that's when we
25 would give the order. Otherwise, I would anticipate

1 that that information would be included in what is
2 being analyzed in the functionality test.

3 MR. MARTIN: Scott Martin, OnePoint
4 Communications. Just two points to amplify on this
5 topic or potentially be more appropriate under the
6 parity section. With respect to jeopardy notices, two
7 key components that I think need to be looked at is --
8 one is when are those jeopardy notices provided? It's
9 been our experience that those are provided at the
10 issuance of an LSR. And if for some reason there's a
11 later point through the provisioning cycle when the
12 jeopardy is realized, we don't get notification at
13 that time. And secondly, there needs to be
14 equivalency of information with respect to the
15 jeopardy between U S WEST retail and what the CLEC is
16 being presented with.

17 MR. BELLINGER: That would be covered in the
18 retail parity test. And we would be looking for
19 equivalency, yes.

20 MR. FINNEGAN: I've got a clarifying question
21 on the maintenance and repair functionality. Whether
22 or not review of a customer's trouble history and the
23 MLT test capability, is that intended to be included
24 in the maintenance functionality test with specific
25 test cases associated with those transactions?

1 MR. BELLINGER: Yes, that's intended to be
2 included. We can provide MLT test, and trouble
3 history could be obtained. That would be actually in
4 the functionality test on maintenance and repair.

5 MS. BEAUPRE: Will the document be updated to
6 reflect that? I don't believe that it was very clear
7 that the MLT was part of the maintenance and repair.

8 MR. BELLINGER: It's specifically in there on
9 MLT testing.

10 MR. FINNEGAN: There's a reference to it on
11 page 19 of the Master Test Plan, paragraph 4.2.2.

12 MR. BELLINGER: So that's specifically in
13 there and planned to be tested.

14 MS. BEAUPRE: Thank you.

15 MR. BUHLER: Excuse me. Before we go
16 forward, if you look at the scenarios, I think
17 scenario 164 and 165, it speaks to MLT.

18 MS. BEAUPRE: Good. Are they identified as
19 both manual and electronic?

20 MR. CRAIN: I guess I don't understand what
21 manual MLT means.

22 MR. BELLINGER: It would have to be
23 electronic.

24 MS. BEAUPRE: The EB-TA.

25 MR. CRAIN: It would be EB-TA and IMA.

1 MS. BEAUPRE: Also in section 4.3.5, it
2 identifies that the test scenarios will contain
3 planned M&R, maintenance and repair, activities. I
4 would like to ask that this be expanded to include all
5 unplanned troubles that are identified during the
6 testing. In previous testing that MCI WorldCom has
7 been involved with, most of the unplanned troubles are
8 the ones that became most visible as to identifying
9 the types of problems. It is very difficult to create
10 a test plan for planned troubles, so it was the
11 unplanned ones that created most of the visibility and
12 tested the capabilities of the system.

13 MR. BUHLER: When I read the last sentence of
14 the paragraph under 4.2.2, I thought that it was
15 speaking to the fact that if accounts that make up the
16 test experience troubles, that those unplanned
17 troubles would then be considered in that the sentence
18 says, "Any trouble that is related to the test
19 scenarios and occurs within the test interval would be
20 considered part of the test."

21 MS. BEAUPRE: And I think that's great. It
22 just leads to a little bit of confusion since section
23 4.3.5 simply says it will contain planned. So I think
24 it leads the reader to misinterpret.

25 MR. BELLINGER: In other words, we plan to

1 plan some repair tests to make sure we have those.
2 But anything that happens unplanned, we would be
3 recording that.

4 MS. BEAUPRE: Excellent. Thank you.

5 MR. MARTIN: Scott Martin with OnePoint
6 Communications again. Just an additional point of
7 clarification back on MLT testing. Scenarios 164 and
8 165 appear to be for business -- exclusively limited
9 to business customers. We would like to see that
10 expanded to residential customers, as well. And as an
11 additional point of clarification, through the IMA
12 platform, we're not currently aware of any capability
13 that we have to perform that electronically today, if
14 that exists. And I'm just not sure if that's intended
15 to be part of the 4.2 releases coming out October 1st
16 and therefore would be covered by the scope of the
17 testing or if that's maybe some capability of the
18 system that we don't know exists.

19 MR. BUHLER: That is part of the next
20 release.

21 MR. MARTIN: Just to kind of clarify that
22 issue, then, is it the position of the third-party
23 here that we will be testing under the guise of 4.2?
24 I'm not sure that's been --

25 MR. BELLINGER: I'm sorry. I didn't hear the

1 first part of that.

2 MR. MARTIN: Is it the position of the third-
3 party and the ACC that we're going to be testing using
4 the 4.2 version of the IMA software?

5 MR. BELLINGER: Yes. The latest version that
6 will be out --

7 MR. CRAIN: End of October. And if you look
8 at our current testing plan, functionality testing
9 will be posted the end of October.

10 MR. BELLINGER: And if we miss scenarios for
11 residential MLT, we'll get that.

12 MR. FINNEGAN: Just clarifying, is there a
13 test case for pulling a trouble history? If not, we'd
14 recommend that that be included as a test case, as
15 well.

16 MR. BELLINGER: Okay. We'll make sure that
17 that's included.

18 MR. PATTEN: Mike Patten on behalf of Cox.
19 Just two issues. It sounds like we're wrapping up the
20 ones we were just talking about.

21 I understood from earlier comments that you
22 do intend to expand the stand-alone LNP testing to
23 include single-line and multi-line residential.

24 MR. BELLINGER: I think one- and two-line
25 residence and one- and two-line business on LNP.

1 Where no loop is required for Cox, you're talking
2 about?

3 MR. PATTEN: Right.

4 Second, and this is somewhat wrapped up in
5 the directory listing issue, but a stand-alone 9-1-1
6 database update test I think is critical both for
7 single-line residential and multi-line residential.
8 Cox has experienced significant problems in delays in
9 other jurisdictions in which they have this, and we've
10 had problems here, as well. So we urge you to put
11 that in. I think among all the testing, that may be
12 the single most important public safety factor.

13 MR. BELLINGER: That's a good point. We'll
14 make sure 9-1-1 is included. And you mentioned
15 directory listing, also.

16 MR. PATTEN: Right.

17 MR. BELLINGER: Okay.

18 MR. HSIAO: This is Doug Hsiao from Rhythms.
19 It seems there's been some discussion about adding
20 xDSL-capable loops in the test plan. And I just
21 wanted to understand whether that would be testing the
22 electronic processes that U S WEST is developing right
23 now or whether we're going to also test the manual
24 processes that cover 100 percent of the orders right
25 now.

1 MR. BELLINGER: We would do xDSL scenarios.
2 Those that were electronic would be done electronic.
3 Those that would require manual processes would be
4 completed that way.

5 MR. HSIAO: Thank you. That's what I was
6 hoping was the case. I wasn't sure at this point if
7 we were holding off the test plan to wait for their
8 electronic interface to be developed.

9 MR. BELLINGER: That should be available at
10 their October release.

11 MR. CRAIN: I guess I'm confused about one
12 issue. We talked about adding a scenario for pulling
13 trouble history. I would think that that would be
14 part of the maintenance and repair tests.

15 MR. BELLINGER: Yes, it would be.

16 MR. CRAIN: Do we need to add an additional
17 scenario to handle that?

18 MR. BELLINGER: We would make sure a trouble
19 history would be looked at --

20 MR. CRAIN: Okay.

21 MR. BELLINGER: -- sufficiently for those
22 trouble cases. I would make sure the scenario
23 included trouble history look-up.

24 Do you have any comment on xDSL?

25 MR. CRAIN: I think that you've decided to

1 handle it in an appropriate way. It ought to be
2 handled just like any other scenario in the
3 functionality test. We just need to add some
4 scenarios to cover that.

5 MR. HSIAO: This is Doug Hsiao from Rhythms.
6 I'd like to emphasize that there should be a number of
7 different test scenarios that are created for this
8 since right now, xDSL-capable loop orders make up the
9 majority of orders in U S WEST's territory right now.

10 MR. BELLINGER: What makes up the majority?

11 MR. HSIAO: Since the majority of loop orders
12 -- UNE loop orders in U S WEST's territory now are
13 xDSL-capable loops, I think it's important that we
14 have a number of these orders tested rather than just
15 as a throw-in into the test scenarios.

16 MR. BELLINGER: Yeah, I had asked at the last
17 workshop that Rhythms -- would you please furnish us
18 what you would like to see in the test.

19 MR. HSIAO: I could talk to the technical
20 person, and I'd be happy to put that together.

21 MR. BELLINGER: Okay. And we'll run that by
22 U S WEST and see if we can't come to an agreement
23 between us about what all would be included there.

24 MS. LUBAMERSKY: Just a point of
25 clarification. It is not the case that the majority

1 of loops in U S WEST's territory are xDSL-capable
2 loops. It is, in fact, a very small minority at this
3 point. Nonetheless, we are committed to running
4 scenarios to include that type, and we welcome the
5 opportunity to add that scenario.

6 MR. HSIAO: That wasn't the point. I was
7 saying that the number of CLEC orders of loops, I
8 believe the majority of them are xDSL-capable loop
9 orders.

10 MS. LUBAMERSKY: That is not the case.

11 MR. BELLINGER: I wouldn't think so.

12 MS. LUBAMERSKY: Nonetheless, we are
13 committed to and welcome the opportunity. I did spend
14 some time with some Rhythms representatives, but I did
15 not have an opportunity to create with them a
16 scenario. I'm confident we can very shortly.

17 MR. BELLINGER: Good. I'd like to get both
18 of you to look at that and give us what you would
19 like, and then we could furnish that for further
20 comment.

21 MS. LUBAMERSKY: We'll do so.

22 MS. BEAUPRE: I'd like to shift a little bit
23 here and address section 4.3.4, billing. MCI WorldCom
24 would request that there be three billing cycles
25 rather than two. The reason for such request is that

1 in other testing that MCI WorldCom has participated
2 in, the error correction cycle is very critical. MCI
3 WorldCom, in auditing its bills, finds that the bills
4 need to be audited. Errors are found, reported back
5 to the ILEC, and the ILEC must correct it. So we
6 request that there be a cycle for correction of bills,
7 along with a disconnect bill. So inherent over that
8 process is that the installs, the changes, the
9 corrections and the disconnects would probably contain
10 three cycles.

11 MR. BUHLER: The billing correction process
12 and the analysis that goes along with that would be
13 provided. Even with the two billing cycles, that will
14 handle those errors. In other words, if you have two
15 billing cycles, the errors that are generated within
16 those two billing cycles would be documented and
17 provided with regards to the time frame. So I don't
18 quite understand the need for having yet a third month
19 to test out the billing error correction cycle because
20 that would be addressed in the first two.

21 MS. BEAUPRE: In the first two, that's
22 correct. And the first cycle would be the issuance of
23 the bill, the second cycle is the verification of the
24 correction. I think we've adopted the military style
25 testing of retesting with correction of errors. And

1 the third cycle would contain the bill for the
2 disconnects.

3 MR. BELLINGER: Why would it be the bill for
4 the disconnects?

5 MS. BEAUPRE: I would assume that we're --
6 and I guess this document really doesn't contain the
7 information for when this testing is complete. The
8 services for the friendlies, the service will be
9 disconnected, and that process of backing out of the
10 services will also be tested. And so that the
11 verification of the disconnect bills will be included.
12 It's another comment that we don't have the take-down
13 of the testing, if you will, incorporated in terms of
14 once the service is disconnected and the friendlies
15 have migrated back to U S WEST, do we get the
16 appropriate notifications and the disconnect billing?

17 MR. BELLINGER: I understand that.

18 MR. CRAIN: I would suggest that those
19 scenarios that involve disconnects would be
20 appropriate in terms of looking at the billing cycle
21 for the disconnects. I don't see a reason to analyze
22 the disconnects of all of the friendlies. It's going
23 to be a special project. I thought that part of the
24 scenarios listed are some disconnects, and those
25 billings will show up in the first two billing cycles.

1 MS. BEAUPRE: I guess I leave it to the
2 third-party consultant to evaluate the process by
3 which you have the scenarios that -- the test cases
4 that are issued against the scenarios that when you
5 have the install and that the consultant realizes
6 there are errors, U S WEST would issue a second bill
7 in that second cycle. Then when the service is
8 disconnected, you then would have the third billing
9 cycle. To accommodate the evaluation of all of the
10 bills of all of the activity that is occurring on
11 these test scenarios, three cycles seems reasonable.

12 MR. CRAIN: But for disconnects, there are
13 specific scenarios that involve disconnects. Those
14 will show up in the first two billing cycles. Whether
15 or not you have the install scenarios, whether or not
16 you need to go all the way through to the actual
17 disconnect of friendlies for the sake of just
18 disconnecting friendlies and ending the task, the
19 ability of U S WEST to bill for disconnects is already
20 incorporated in the scenarios in the test, and there's
21 no reason to do a special analysis of our closing out
22 of the test accounts.

23 MR. BELLINGER: Okay.

24 MS. BEAUPRE: Point/counterpoint.

25 MR. BELLINGER: I think what we'll do with

1 that one is let the third-party fully evaluate the
2 process and any additions that we need in terms of a
3 third billing cycle, we can have them review that.

4 Any more comments on the functionality test?

5 MS. BEAUPRE: In terms of the -- I believe
6 that there are some sections on the set-up of the
7 testing, and there's documentation on the management
8 of the friendlies. Since we're all aware that
9 unbundled loops will also be tested that perhaps there
10 may be some documentation included on the set-up of
11 the facilities for the unbundled loop, the
12 identification of the collocation addresses. There's
13 an awful lot of discussion in here on the friendlies
14 which is related to the customer side of the services,
15 but for the facilities for unbundled loop, there's
16 some set-up work that's probably not documented here.

17 MR. BELLINGER: It wasn't intended to be
18 documented here at this point. We wanted the third-
19 party consultant to work through those issues and
20 document that. If there's something specific --

21 MS. BEAUPRE: There was a lot of
22 documentation on how to identify and manage the
23 friendlies, but there wasn't anything in terms of how
24 do you set up and manage the facilities for unbundled
25 loops. I mean, that was equally important in Texas as

1 it was in any kind of testing. I'm not saying that
2 it's omitted intentionally, but it just appears that
3 this was centered around the friendlies, and I
4 understand that that is a big criteria of a successful
5 test. But I think we also have to make sure that
6 we've got sufficient facilities and collocations for
7 the unbundled loop testing.

8 MR. BELLINGER: Okay. We'll make sure we've
9 covered that.

10 I think we've covered everything on the
11 functionality test that I recall in the documentation
12 that I've read that was submitted.

13 Anybody not cover any of the items? Or any
14 additional items?

15 (No response.)

16 MR. BELLINGER: Okay. We'll go to the retail
17 parity test.

18 MR. FINNEGAN: This is John Finnegan of AT&T.
19 I've got a comment on the retail parity evaluation
20 scope. Page 29, paragraph 5.2 states, "These tests
21 cover pre-ordering, ordering, and maintenance and
22 repair scenarios." What AT&T would recommend is I'm
23 not quite sure if it would be called a provisioning
24 scenario or if it might be part of the ordering
25 scenario. But customers will quite often call on the

1 day of service or day after service, inquiring as to
2 the status of their orders, what's going on with it.

3 I had seen a demonstration of U S WEST's
4 retail OSS last week. Their customer service
5 representatives have access to systems called SOLAR,
6 S-O-L-A-R, and SOPAD, S-O-P-A-D, that provides quite
7 extensive information on the status of orders that is
8 not available to CLECs. The ability to obtain this
9 information allows U S WEST's retail representatives
10 to do a lot more with orders than I think a CLEC would
11 be able to do.

12 So my recommendation is that the scope of
13 tests be also expanded or clarified to include those
14 order status situations as part of the ordering
15 scenario or the provisioning scenario.

16 The other comment along those lines is --

17 MR. BELLINGER: Any comment from U S WEST on
18 order status comparison?

19 MS. NOTARIANNI: Yes, this is Lynn Notarianni
20 from U S WEST. And I guess it's our understanding in
21 reading the test that in the retail comparison that
22 they are going to be looking at the input -- the
23 inputs and the outputs of what's experienced on the
24 wholesale and the retail side of the business and will
25 make that comparison and the experience. And to the

1 extent that they feel like there's a problem there, it
2 will be addressed. So to the extent things are
3 happening, whether it's that or another matter
4 happening in the ordering or whether you combine
5 ordering and provisioning, whatever you call that
6 process, but that will be taken into account.

7 MR. BELLINGER: The intent would be to
8 evaluate apples to apples what the CLEC sees versus
9 what the retail sees. And if the retail has access,
10 we would evaluate that compared to what a CLEC has.

11 MR. FINNEGAN: What I wanted to clarify is it
12 wasn't limited to just taking the customer's order.
13 And that the scenario should include some order status
14 scenarios afterwards that would not be first contact
15 with the customer. There may be subsequent contacts
16 where the customer is requesting information, and we
17 should compare the level of information that CLECs
18 have access to versus the level of information that
19 U S WEST has access to.

20 MR. BELLINGER: That's intended.

21 MR. BUHLER: I just want to clarify.
22 Providing more specific information about the service
23 order as compared to the LSR is a capability that we
24 are working on for the first part of next year. So to
25 the extent that you're talking about measuring

1 providing that service order information to the CLEC,
2 that capability is coming within that time frame.

3 MR. BELLINGER: We'll evaluate what's there.

4 MR. FINNEGAN: Another comment, and this
5 might be implicit in here, but I'd like to make sure
6 it's clarified. I think in ordering -- in evaluating
7 the retail parity evaluation, you first want to start
8 with U S WEST's retail processes to see what they have
9 available to them and not only compare what they have
10 available to them in terms of equivalents, but do they
11 have the same for want of a better term quantity of
12 information.

13 For instance, the test plan appears to start
14 with let's look at what U S WEST has decided the CLECs
15 should have access to. And for those functions that
16 the CLECs have access to, let's compare it to the same
17 access that U S WEST retail has. There are some tools
18 such as the SOLAR and order status information that
19 Mr. Buhler was referring to that CLECs don't have
20 access at all. I think there should be a part of the
21 Master Test Plan that takes note of that, and there
22 probably wouldn't be an evaluation per se, but just of
23 the fact that there are some tools available to U S
24 WEST that are not available in any form to CLECs or
25 maybe an inferior means of obtaining that information.

1 MR. BELLINGER: That first paragraph covers
2 what we're looking for, is what the CLEC
3 representative has and can do with information and
4 compare that with what the U S WEST representative
5 can. It doesn't mean to look at one first, another
6 one second. It's a direct comparison of what they can
7 do.

8 MR. FINNEGAN: That's good.

9 MR. BELLINGER: And qualitative evaluation,
10 as well. In other words, the quality of information
11 they can receive and utilize.

12 MR. FINNEGAN: Another comment was when CLECs
13 roll out service, whether it's an unbundled loop
14 service or DSL service, one of the pieces of
15 information they're going to need to know or would be
16 quite beneficial to know is, does U S WEST's network
17 support the technology that the CLEC wants to
18 introduce not on a line-by-line basis but on more of a
19 network basis? To do line-by-line evaluations of
20 whether your technology can work with that specific
21 customer is something that you're eventually going to
22 have to do. But at a higher level from a network
23 planning perspective, an evaluation of what
24 information does U S WEST make available to itself
25 when it's, say, rolling out a new DSL service in an

1 area versus what network and planning information does
2 U S WEST make available to CLECs when they're trying
3 to do the same thing.

4 So we think that retail parity evaluation,
5 retail may be a -- may be too limiting a term. U S
6 WEST's retail/internal operations parity evaluation.
7 U S WEST does have this information to make use of it.
8 In order to be providing equivalent information, that
9 information should also be made available for network
10 planning and administration purposes under the
11 auspices of preordering. You want to find out when
12 you place the order whether you can provide that
13 service, as well.

14 MR. BELLINGER: Can you comment on a specific
15 service that you're thinking of?

16 MR. FINNEGAN: AT&T has a situation where in
17 Arizona we've been obtaining unbundled loops from U S
18 WEST. If a customer presently has service and that
19 loop is being serviced through integrated digital loop
20 carrier, it's difficult to peel off an individual
21 CLEC's loop, if not impossible, so you can provide
22 that customer service through the same facilities.

23 What U S WEST does instead is look through
24 their loop plant to see if there's any spare copper
25 laying around. What we've found is we have customers

1 with existing service. We try and migrate them to
2 unbundled loop, and the order goes held for facilities
3 loaned. We suspect it's because those customers are
4 being served through IDLC facilities. So from a
5 planning perspective and a customer satisfaction
6 perspective, it would be valuable for us to know that
7 in this central office, 100 percent of the loops are
8 being served by IDLC, so if you are planning on using
9 unbundled loops in this area, you should expect a
10 large number of held order or facility unavailability
11 situations.

12 Another situation, to give another example, a
13 company like Rhythms or Jado or some of the other DSL
14 providers, they need to know if there's clean copper
15 available in the area or are the facilities served
16 through fiber. If the facilities are served through
17 fiber, it probably doesn't make sense to do any
18 marketing in the area because it's going to be
19 difficult to get the loops they need to provide their
20 service. So that's another example of network
21 planning information that U S WEST makes available to
22 itself that should also be made available to CLECs in
23 order for them to compete on equal footing in the
24 introduction of products and services.

25 MR. BELLINGER: I don't see that as an OSS

1 function. I understand what you're talking about
2 because there's no central office that has any kind of
3 loops provided 100 percent any kind of way. Over
4 time, it's done through a DLC, regular DLC. Anything
5 within 6,000 feet is probably copper, depending on
6 numbers of facilities and so forth. But it's still
7 not an OSS function per se. Do you want to comment?

8 MR. CRAIN: I agree that that is not an OSS
9 function, and this is an OSS test, which I think we're
10 greatly expanding it again.

11 But one point of clarification in relation to
12 4.2 in the preorder qualifications for unbundled loop
13 in terms of whether or not a customer is served on
14 digital loop carrier. So that will be included in the
15 test plan. So a portion of the DLC issue that is
16 related to OSS will be included in the test plan.

17 MR. BELLINGER: But I was understanding it
18 was not a loop-by-loop hookup. It was more a general
19 availability for a central office area.

20 MR. CRAIN: My understanding was that AT&T
21 was bringing up both issues. I wanted to clarify the
22 one issue, and I agree that the other issue --

23 MR. BELLINGER: They can do a loop-by-loop
24 hookup, and that would be included in the
25 functionality test.

1 MR. FINNEGAN: But the other issue is from a
2 network planning administration. In terms of whether
3 it's an OSS issue, I think it is, gets to preordering
4 issues, gets to provisioning issues of whether or not
5 they'd be able to provision our service to the
6 customers.

7 MR. BELLINGER: They do have the ability to
8 hook it up on a loop-by-loop basis.

9 MR. FINNEGAN: Right. But they also have the
10 ability to make some generalizations about whether or
11 not a technology is suitable in an area based on some
12 of their information they contain. I don't know if
13 it's an electronic database. I don't know if it's on
14 paper. I don't know if it's in the back of somebody's
15 desk. But they do have information available to
16 themselves that they use for preordering and
17 provisioning purposes when they are rolling out a
18 service. And I think a relevant evaluation to make is
19 can CLECs have access to that same information U S
20 WEST makes available to itself to determine whether it
21 can equally as well or equally as informed provision
22 the technology the CLEC wants to provision on the U S
23 WEST network equipment. If you're doing it on a
24 loop-by-loop basis, you've got a tough row to hoe.

25 MR. BELLINGER: U S WEST supports a loop-by-

1 loop hookup, but I don't think OSS is supportive of
2 area-by-area evaluation. You have to do that another
3 way.

4 MR. FINNEGAN: I think you made reference to
5 it, copper if it's less than 6,000 -- or if the
6 location is less than 6,000 feet from the central
7 office, it's probably served by copper. That would be
8 good information to know. I don't know if that's an
9 exact rule at U S WEST.

10 MR. BELLINGER: It's not an exact rule. It's
11 a common rule, but it varies by cost basis.

12 MR. FINNEGAN: Right. And it would be
13 valuable for the CLECs to know what type of facilities
14 there are, not necessarily rules on how to determine
15 their network management. But it would be valuable
16 and beneficial for the CLECs to know the type of
17 technology and the state of the network that U S WEST
18 has it. May not be on a central-office-by-central-
19 office basis, but U S WEST does have information on
20 what type of plant they have out there; and based on
21 that information, they can make decisions on what
22 technology can be rolled out and what technology can't
23 be rolled out. And they do this on a loop-by-loop
24 basis, but they also do it on larger geographic areas.

25 MR. HSIAO: This is Doug Hsiao from Rhythms.

1 I'd like to support AT&T on those statements. It's
2 important to realize that the FCC recently has not
3 only said that CLECs have not only access to loop
4 qualification record, which is U S WEST's record of
5 what information they want to give to CLECs, but they
6 also are required to provide the data that's
7 underlying those determinations.

8 MR. BELLINGER: I understand U S WEST can
9 provide you the particular loop; not qualification,
10 but loop make-up. That's my understanding of what
11 they've said.

12 MR. HSIAO: I'm sorry.

13 MR. BELLINGER: They can provide you loop
14 make-up information. They have the ability to. And
15 that's in their plans to provide that in the next
16 release as the loop make-up, which would be specific
17 and not qualification, is what I've understood.

18 MR. CRAIN: That is correct. And I guess I'd
19 like to reiterate the point that we need to understand
20 that this is an OSS test. It's not going to test
21 absolutely every issue that might come up in a 271
22 case. And I really think that this issue is
23 appropriate for a hearing on this case. It's been
24 dealt with in terms of interconnection agreements and
25 other things like that. And rather than having an OSS

1 expert come in and evaluate something that isn't OSS,
2 I think that that should be left for other stages of
3 this proceeding.

4 MR. MARTIN: Scott Martin of OnePoint
5 Communications. Just two points I would make on this
6 same topic. I would suggest that we need a couple of
7 scenarios that are going to look at and evaluate the
8 differences in how facility assignments are made to a
9 CLEC versus made internally to U S WEST customers.
10 And that would be a meaningful and objective
11 evaluation to see if there are indeed differences or
12 if finally there are not.

13 And then -- I lost my second point. I
14 apologize.

15 MR. BELLINGER: Would it be something that
16 would disadvantage you other than xDSL?

17 MR. MARTIN: Oh, yeah. This happens even
18 with POT service. Just to give you the example, we
19 have a customer that's moving within an existing
20 apartment complex. Maybe they're upgrading their
21 apartment or whatever. When the transfer work order
22 goes through, many times in apartment A, they were
23 tying up a facility, just a copper POTS facility.
24 When they go to apartment B, the copper POTS facility
25 has been taken by U S WEST retail for their customer.

1 MR. BELLINGER: But you were referring to
2 choice of facilities, and I was trying to understand.

3 MR. MARTIN: I'm actually just saying that
4 the evaluation should look at how facility assignments
5 are made to CLECs and how facility assignments are
6 made within U S WEST retail to make sure that's a
7 level playing field. Especially with the situation we
8 have in Arizona where facilities are many times
9 scarce, it's particularly important to make sure we
10 have equal footing to get the scarce facilities that
11 are out there.

12 MR. BELLINGER: That would be the purpose of
13 this particular test.

14 MR. MARTIN: A couple of additional comments.
15 I'd like to see a couple of scenarios added to deal
16 with jeopardy orders that come through or jeopardy
17 conditions, if you will. Specifically, I would cite
18 three areas that I'd like to see evaluated:

19 One is how working left-in situations are
20 processed by U S WEST retail and CLECs, how those
21 kinds of situations are handled and the types of
22 situation that each party has access to.

23 The second type of jeopardy is just generally
24 all held orders.

25 And then the third category, which are

1 escalated for any reasons, the escalation procedures
2 that CLECs must go through and the escalation
3 procedures available to U S WEST retail. And I would
4 ask that those be evaluated to make sure each party
5 has the chance of getting the resolution they're
6 seeking.

7 MR. CRAIN: I think some of this information
8 is going to be included in the retail parity
9 evaluation. What we're looking at here I believe --
10 and once again, we must remember that this is an OSS
11 test, is a comparison of the information being passed
12 back on OSS to U S WEST representatives versus the
13 information being passed back to CLEC representatives.
14 When you get into a lot of these other issues, I
15 believe that those are not -- that we are wading into
16 some issues that aren't OSS here and that we need to
17 limit this evaluation to OSS.

18 The third-party evaluator will look at
19 facilities check, whether or not it's the same
20 information being passed back, will look at the due
21 date and appointment scheduler responses to see that
22 both U S WEST and the CLECs get the same due dates and
23 appointments in the same areas for the same services.

24 When you're talking about escalations and how
25 those are handled and that sort of thing, I think

1 we're getting beyond OSS there.

2 MR. MARTIN: Just a couple points on that.
3 Really, I guess to clarify what I'm asking for is
4 specifically held orders and left-ins I want to make
5 sure that we have scenarios to fit those conditions to
6 make sure that there is equivalency of information and
7 system access and visibility to those critical types
8 of information.

9 MR. BELLINGER: Just a comment quickly. The
10 test is to look at information presented to each
11 representative and is equivalent. And facility
12 availability would be one of those areas evaluated.
13 Do they get the same information for facilities or
14 not?

15 MR. MARTIN: I guess I don't see a scenario
16 that's going to cover the conditions that I'm
17 identifying.

18 MR. BELLINGER: It would be because if I get
19 a screen that says what's available facilitywise, and
20 it's the same screen -- that U S WEST
21 representative has the same information, then it's the
22 same. And that would be looking at orders and
23 comparing the information that one gets versus the
24 information the other gets. And does one have an
25 advantage in terms of facility availability. And if

1 it's there and the U S WEST representative says,
2 ah-ha, there's a left-in that I can get that you don't
3 get that information, then we'd identify it.
4 Otherwise, if we get the same information, we should
5 be able to identify it.

6 MR. MARTIN: As long as you have a test case
7 that's going to make sure that condition arises. If
8 you don't have a test case that's going to ensure that
9 condition arises, you'll never see any difference in
10 the pieces of information. So as long as it's there,
11 I'm fine.

12 And with respect to the comments from Mr.
13 Crain on the escalations processing, again, I would
14 cite back to the FCC's '97 298 order, where they've
15 clarified that it does include the human interfaces
16 that are necessary to work in the preordering/
17 ordering, provisioning, maintenance and repair areas.
18 And therefore, I think escalations is a very relevant
19 part of OSS testing.

20 MR. BELLINGER: Very good.

21 MS. TRIBBY: Mary Tribby with AT&T. Just one
22 comment on the facility availability. I think what
23 you're saying is good, that you intend to evaluate
24 what CLECs have access to versus what U S WEST has
25 access to. I would just encourage you not to make a

1 determination until you do that evaluation of whether
2 it's an OSS issue or not. I think one of the things
3 the FCC contemplates in determining OSS issues is what
4 is in the databases behind the electronic interfaces,
5 as well, obviously. And to the extent that U S WEST
6 service representatives may not every time they take
7 an order pull up information from a particular
8 database that talks about what their network looks
9 like but that they have the capability to do that not
10 just on a loop-by-loop basis but on a network overall
11 basis, to the extent that information is available to
12 them through the databases, that needs to be looked at
13 in terms of whether the CLECs get parity or not. And
14 we suspect sitting here today, we don't know how U S
15 WEST gets that information for themselves, but we
16 suspect that they can do some database dips to get
17 that information, and that's important for us to have
18 access to that, as well.

19 MR. BELLINGER: That's the whole purpose for
20 this test, to look at what they can do versus what a
21 CLEC representative can do. That's the whole purpose
22 of this particular test, is to evaluate that and
23 hopefully evaluate whether it's parity or not.

24 MS. TRIBBY: And I would just say that you
25 need to look at not necessarily what occurs each and

1 every time a retail representative may take an order,
2 but there may be scenarios that don't occur every time
3 but that they had access to, and those would need to
4 be evaluated, as well.

5 MR. BELLINGER: Okay.

6 MR. CRAIN: We had one comment on this retail
7 parity evaluation. It's U S WEST's position that part
8 of this retail parity evaluation is redundant of the
9 performance measures test and is unnecessary and
10 therefore should be eliminated. We understand the
11 test is designed for basically a general comparison
12 between the information and experience that we can
13 give our customers versus the information and
14 experience that CLECs can give their customers using
15 the interfaces.

16 To the extent that there's actually going to
17 be a measurement during this test of the response
18 times or how quickly a screen pops up, that is being
19 evaluated in the performance measure section. We do
20 report that information. And those results and
21 responses to those performance measures will be
22 evaluated in performance measures evaluation. We do
23 feel this is redundant. Dean Buhler is going to talk
24 about some of the details here.

25 MR. FINNEGAN: I'd like to respond to that.

1 MR. BELLINGER: I was going to continue, and
2 then I'll let you respond.

3 MR. FINNEGAN: I'm sorry.

4 MR. BELLINGER: It was a hand-off.

5 MR. BUHLER: Not just duplicative but perhaps
6 impossible. If we just take one example, validating
7 an address, in IMA, after you plug in the information,
8 you hit a button, and you get the response back. But
9 on a retail site for our units that take orders for
10 residential and small business customers, the system
11 that they use is not designed that way. It is
12 sequential in nature. So that if you want to validate
13 an address in the process of taking an order, when you
14 plug in your address information, you don't just wait
15 for a response and have that address validated.
16 You're obligated to go through intervening screens
17 that are related to validating the address. And so if
18 you have a person with a stopwatch trying to make
19 equivalent measures, it becomes very difficult on the
20 retail side to know when to start and stop the watch
21 because it's not sequential. It's circuitous. So I'm
22 not sure that that particular measurement can even be
23 done by a person. And then, as Andy said, the
24 measurements for the response time would be collected
25 in part of the test. So it's redundant.

1 MR. FINNEGAN: Thank you.

2 MR. BELLINGER: Go ahead.

3 MR. FINNEGAN: The retail parity evaluation,
4 one of the benefits of this test, I think -- and it
5 might help Mr. Crain if I share at least my
6 understanding of how it would work. The performance
7 measurements are primarily going to get to the timing
8 issues, how long does it take to get something done.
9 What the retail parity evaluation is also going to
10 allow us to evaluate is the manner in which
11 information is provided. While a preorder query
12 response time performance measurement will let you
13 know how quickly you obtain the information, there's
14 also a qualitative evaluation necessary to determine
15 whether there is equivalent information provided and
16 whether that information is as accurate as provided to
17 the CLEC as it is provided to -- as provided to U S
18 WEST itself.

19 I'm looking at the retail parity evaluation
20 as primarily the qualitative test or the manner in
21 which information is provided or the amount of
22 information available to the CLEC versus what U S WEST
23 makes available to itself.

24 MR. BELLINGER: Okay. And that's true, but
25 to respond to the measurement part, I think Dean makes

1 the point that they may not be directly comparable.
2 Therefore, an evaluation I think like this is
3 necessary because I think it's not directly just a
4 response. For example, you mentioned facility check.
5 Well, I think an evaluation of what the representative
6 is going through for one ILEC versus the CLEC, that's
7 the only way you can do it. Because if the response
8 is not directly applicable, then how else can you do
9 it other than do a retail evaluation.

10 MR. CRAIN: And I guess I understand that
11 point, and to the extent that the third-party tester
12 is looking at the general issues of the amount of
13 information, kind of information that's being passed
14 back and whether or not timing and everything else
15 allows people to -- allows our representatives and
16 CLEC representatives to give generally an equivalent
17 experience to the customers, I'd agree that should be
18 part.

19 To the extent it's going to be -- I guess I
20 just want a clarification it's not going to be a one-
21 to-one comparison that this took blank amount of time
22 and that took blank amount of time rather than just an
23 overall comparison of the interfaces.

24 MR. BELLINGER: Especially like I said if
25 it's not something that's directly comparable, we

1 don't evaluate it on a qualitative basis, that the
2 experience would be the same to the representatives,
3 and the customer that would be dealing with the
4 representatives. The information that they can get it
5 on a timely basis, then it's comparable. Depending on
6 what your process is, I understand it's probably
7 different. But then that's the only way I know to
8 really evaluate, is to actually compare them.

9 But one other reason for the measurement I
10 wanted to raise is that both in Texas and New York,
11 there is a controversy over response times of the
12 systems. And this would be another place we could
13 compare those response times for those that are
14 directly comparable. Both New York and Texas has
15 gotten into a lot of controversy over how to measure
16 it and what they're actually measuring. So this is
17 another place we can make a comparison.

18 MR. MARTIN: I would just cite that I think
19 the principle of what we're looking for with this
20 particular item is that there's reasonable
21 equivalency. I don't think that at least in our case
22 we're insisting upon it has to be exact as long as we
23 have a reasonable opportunity to compete for the
24 information that they have.

25 MR. BELLINGER: And the requirement is not

1 that.

2 MR. MARTIN: And as an example, that the CLEC
3 is not burdened with several additional steps over and
4 above procedurally what the U S WEST retail
5 representatives are burdened with. And the example I
6 would cite to get to highlight one is the same one
7 that Mr. Buhler represented there, is that it is our
8 understanding that U S WEST's retail representatives
9 have the ability to do the facility check telephone
10 number validation and residential address validation
11 in one step. And the CLECs using the current platform
12 4.1 have to do that in three separate steps and at
13 three times the speed, if you will, as well as having
14 to put in multiple times the same type of redundant
15 information.

16 That's the intent to raising these issues, is
17 to try to highlight some of these differences.

18 MR. BUHLER: Dean Buhler, U S WEST.
19 Actually, that's not true as it's represented by
20 OnePoint. But the point that I was trying to make
21 isn't that he can't figure out what is equivalent on
22 the two sides but that it can't be measured with a
23 stopwatch by a person because the processes are
24 circuitous, not one for one. And that the
25 measurements for response time does take into account

1 those differences. So it can be measured
2 electronically, it can't be measured by a human. That
3 was the point that I was trying to make.

4 MR. BELLINGER: Okay. I think this test is
5 the best one that we can come up with that allays some
6 of the comments that OnePoint's concerned about and
7 MCI, AT&T have both raised, as well as Rhythms. So
8 this is the best test that I think we can come up with
9 that tries to take out just strictly direct
10 measurements and says, what is the experience of one
11 representative versus another and what steps they have
12 to go through.

13 MS. BEAUPRE: MCI WorldCom also supports the
14 objective of this test.

15 One of the other problems that were cited in
16 other state proceedings is the fact that it's the
17 blindness through the functionality testing with the
18 ILECs. There's got to be a means to identify these
19 individual test cases in order to back out these test
20 cases. So there's a certain amount of visibility to
21 the ILEC when submitting the orders. So through this
22 retail parity, it's a true evaluation of the processes
23 U S WEST applies. So MCI WorldCom does support the
24 intent of this testing.

25 I wanted to kind of make a question, comment,

1 request for clarification on the volume determination.
2 It does say that the third-party consultant will
3 determine these volumes. The volumes used for this
4 test will be less than the functional test. I
5 recognize that and don't object to it, but I think the
6 process by which that determination and the criteria
7 used to determine that volume I think might be good to
8 look at here. A volume of two to six is certainly
9 inefficient, but what is a sufficient volume to
10 determine the retail parity, extended documentation
11 might be a better clarification here.

12 MR. BELLINGER: Well, the general volumes
13 that are looked at in terms of what is the number that
14 would provide some statistical validity. Two to four
15 would not provide that. And so what we're asking them
16 to do is what number would it require to give us
17 statistically valid information.

18 MS. BEAUPRE: And what criteria is used to
19 determine that valid statistical amount.

20 I will assume based on the conversations
21 today that the test scenarios would probably increase
22 and have an increase of test cases. And if there is a
23 weighted evaluation based on the total number of
24 functional test cases, just how will that process be
25 done? I will also hope that the determination of this

1 volume will be shared with the group and that CLECs
2 and U S WEST will all have participation in that
3 determination.

4 MR. BELLINGER: With the final test plan, you
5 would have a chance to review it, and that information
6 would be included.

7 MR. FINNEGAN: On the specific test cases,
8 and I'm sure we'll have much more discussion on that
9 in our next few sessions, yes, there are test cases
10 that talk about scenarios like a number portability
11 connect. But to OnePoint's comment, I think we may
12 need some subspecies of new connect, maybe number
13 portability connect for residential customer, working
14 left-in. And then look at what U S WEST does with
15 that situation versus what the CLEC is able to do with
16 that situation. Or customer wants DSL service or
17 tries to sign up for DSL service. What information is
18 available or what experience does a customer have with
19 U S WEST versus the CLEC?

20 I don't know if we want to agree now or
21 debate on the addition of test cases or how that's
22 done, but yes, at a high level, a new connect
23 encompasses that area. Are we saying or should we
24 talk about the specificity of the test cases to
25 encompass in them scenarios we know are problems

1 already or are more difficult challenges than a
2 straight new connect?

3 MR. BELLINGER: You're almost to the point
4 where you say, well, we need to investigate problems
5 rather than come up with testing arrangement of
6 scenarios. And I don't know. That's -- in other
7 words, you're creating specific problems and see how
8 they're handled.

9 MR. FINNEGAN: Not necessarily -- well, I
10 don't know if we necessarily have to create the
11 problem, but go through a situation or investigate a
12 situation -- we may not have to take it through to
13 provisioning, but we can look at the information
14 equivalents up front and see what's happening. And I
15 don't want to --

16 MR. BELLINGER: I don't understand your
17 point, but I don't know. I'd have to think about how
18 to do that.

19 MR. FINNEGAN: I guess from a procedural
20 point of view, at what point do the accusations of
21 "you're trying to get another bite at the apple"
22 start. Yeah, we had a new connect test case in there,
23 and now you want the number portability connect test
24 case with the working left-in. We talked about that
25 on September 20th, and speak now or forever hold your

1 peace.

2 Procedurally as we uncover these items or how
3 would we get these in there into the test cases if
4 they're not already in there?

5 MR. BELLINGER: And I guess part of it, we
6 have to rely on the measurements themselves. If you
7 look at overall provisioning by a CLEC versus U S
8 WEST, what percentage do they hold the orders, and
9 what percentage of the orders are completed on time.
10 So from tops down, you've got a picture of how well
11 they're doing in providing service for the CLEC versus
12 themselves. So the measurements themselves gives you
13 a way to compare service provided.

14 MR. FINNEGAN: There's measurement issues,
15 but there's also through random chance things won't
16 happen through the test. Working left-in, for
17 example. We may have some test cases with friendlies
18 that for some reason none of them have a working
19 left-in condition. If that's the case, we're not
20 going to be able to test the process for how we deal
21 with a working left-in condition.

22 MR. MARTIN: I think it's obvious, but we
23 definitely agree with the point being made by AT&T at
24 this point. And just to put it in a little bit of
25 context, some of the situations that we're indicating

1 like held orders or working left-ins are not an
2 uncommon occurrence. They are a very common
3 occurrence. And it could potentially be that just
4 through the luck of the draw that we don't hit one of
5 those situations.

6 So it would be our preference to have
7 scenarios built in to incorporate making sure that we
8 hit those scenarios. Not because we're trying to take
9 a problem and leverage this forum to get that problem
10 taken care of, but more the frequency with which that
11 problem arises. We want to make sure that it's
12 represented in size and volume to make sure we
13 evaluate in terms of OSS.

14 MR. BELLINGER: We'll consider how we might
15 do that. It might be something we'll have to delay
16 until tests are occurring and what we see.

17 MR. MARTIN: Most likely, you'll hit it by
18 chance, but just to be sure.

19 MR. BELLINGER: If it happens as often as you
20 say, we ought to be able to hit one.

21 MR. MARTIN: One more point. We would also
22 like to have a scenario or two built in specifically
23 targeting preferential telephone numbers by a
24 customer, for example.

25 MR. BELLINGER: Vanity numbers?

1 MR. MARTIN: Vanity numbers or I want a bunch
2 of sevens in my number. A customer requesting
3 something unique about their phone number to evaluate
4 what capabilities a CLEC has for filling that request
5 versus the U S WEST retail side.

6 MR. BELLINGER: That could be done in the
7 retail parity test.

8 Any other comments on the retail parity test?

9 MR. FINNEGAN: I've got two scenarios I'd
10 like to suggest be added in there. One is a
11 comparison of the information and support a customer
12 receives when they order specific access versus the
13 information and support they receive from --

14 MR. BELLINGER: You're talking about access
15 to friendlies?

16 MR. FINNEGAN: Private access circuits,
17 private lines, DS1s. The information they receive
18 from special access circuits versus unbundled
19 dedicated interoffice transport. And let me represent
20 an example that Joe Gentry brought up in Minnesota.
21 They had some collocations they wanted to connect to
22 each other, Rhythms collocations. They had existing
23 relationships with for want of a better term a U S
24 WEST retail group where they had been going to them
25 and ordering stuff. When they ordered special access

1 circuits, they received maps of the fiber in the area,
2 they received a lot of information on the facilities
3 that was in there, a lot of information on the
4 equipment that was used to provide those facilities.

5 When they tried to order unbundled dedicated
6 interoffice transport, functionally the same thing,
7 they were told they couldn't go through that group,
8 they had to go through the wholesale group, and none
9 of that information was made available to them. There
10 was much less information made available as a
11 purchaser of unbundled dedicated interoffice transport
12 than there was as a purchaser of retail specific
13 access.

14 In Joe's example, Rhythms decided the hassle
15 and the lack of information equivalence was not worth
16 it, so they purchased the special access circuits as a
17 means of collocating their special circuits, even
18 though the unbundled dedicated interoffice transport
19 was one-third the price.

20 MR. BELLINGER: Do you all have any comment
21 on this?

22 MS. LUBAMERSKY: The FCC has recognized that
23 there is no retail analog for unbundled network
24 elements. U S WEST has every right to offer
25 additional functions, functionality information to our

1 IEC customers and end users who choose to purchase
2 special access. We'll continue to do so. We have no
3 such obligations to provide additional information for
4 an unbundled network element. There is no retail
5 analog.

6 MR. BELLINGER: I think we've kind of hit on
7 this before, so we'll look at it and see what we come
8 up with.

9 MR. FINNEGAN: Another scenario, it was
10 something I just was made aware of last week, the
11 issue of completion notices. Apparently, and I don't
12 know how extensive it is, U S WEST has a program of
13 auto completion notices where retail customers, if
14 they order service from U S WEST, same-day
15 installation, they get a phone call from U S WEST with
16 a prerecorded announcement, informing them that their
17 service can be completed. I don't know how extensive
18 this service is or this practice is, whether it's a
19 test situation or not.

20 In comparison, the CLECs receive not same-day
21 or pretty close to realtime completion notices. They
22 receive them in batch fashion sometimes in the middle
23 of the night with a bunch of other information. I
24 think the process of providing completion notices for
25 retail customers should be compared to the process of

1 providing completion notices to CLECs.

2 MR. BELLINGER: Okay.

3 MR. MARTIN: Just to generalize that comment,
4 I believe the section around parity is going to look
5 more holistically at the differences in transaction
6 types across the board, whether one is batch, one is
7 realtime, one is manual, one is automated. That is my
8 assumption. And therefore, this particular item I
9 would like to see generalized to apply to the whole
10 section of parity testing to make sure that if U S
11 WEST's retail has realtime access to some piece of
12 information that a CLEC also has that same type of
13 availability across the board.

14 MR. BELLINGER: That's the purpose. Anything
15 in particular we didn't address?

16 MR. MARTIN: I just wanted to clarify since
17 AT&T cited that specific example, that wasn't the only
18 example.

19 MR. BELLINGER: Completion notices?

20 MR. MARTIN: Yes. I wanted to make sure it's
21 going to be holistically applied.

22 MR. BELLINGER: Let's break for lunch. 1:15,
23 we'll resume.

24 (A recess ensued at 12:10, and the workshop
25 resumed at 1:25 p.m.)

1 MR. MOTYCKA: Let's go back on the record.
2 Where we left off was with dialing parity. And if
3 there's any additional comments from any of the
4 parties, I guess this would be the appropriate time to
5 bring it up. Otherwise, we'll move on to the next
6 topic.

7 MR. BELLINGER: No further comments?

8 (No response.)

9 MR. BELLINGER: Let's move on to change
10 management. Who would like to start with change
11 management?

12 MS. BEAUPRE: I figure you've got a lot to
13 say, and I'll dovetail on yours.

14 MR. FINNEGAN: I've first got a clarifying
15 question. On page 40, section 7.6, it talks about U S
16 WEST-CLEC interaction. That's something AT&T thinks
17 needs to be evaluated, but the section of the Master
18 Test Plan devoted to that topic does not seem to be
19 extensive. It's a couple of inches on a page of the
20 sheet.

21 The question is, was this intended to be a
22 placeholder or was the intent that this was sufficient
23 to describe how the CLEC-U S WEST interactions would
24 be evaluated?

25 MR. BELLINGER: In terms of operation support

1 systems, this is how they should be evaluated. In
2 other words, this is an operation support system
3 Master Test Plan, and these are the areas that U S
4 WEST and CLECs interact in terms of operation support
5 system.

6 MR. FINNEGAN: With that clarification, --
7 I'm trying to find it in our comments. AT&T would
8 recommend that the evaluation process that was used in
9 the New York Master Test Plan, and I believe we cited
10 in our comments be used to provide a little more
11 substance to the process of the evaluation of the
12 CLEC-U S WEST interactions.

13 MR. BELLINGER: Any specific additions you're
14 recommending?

15 MR. FINNEGAN: We did have some specific
16 additions. In addition to what was referenced on page
17 40 would be evaluations of the network design,
18 collocation, and interconnection planning process, the
19 system administration help desk, forecasting process.

20 MR. BELLINGER: Forecasting?

21 MR. FINNEGAN: Forecasting process.

22 MR. BELLINGER: Forecasting what?

23 MR. FINNEGAN: Interconnection, trunking,
24 mainly. There may be some other processes involved
25 with forecast of OSS usage or UNE usage.

1 MR. BELLINGER: Well, we have that in terms
2 of usage.

3 MR. FINNEGAN: In section 7.6?

4 MR. BELLINGER: Usage in terms of OSSs or
5 usage in terms of capacity test evaluates usage of
6 OSSs?

7 MR. FINNEGAN: I'm talking about forecasting
8 in terms of what's the process that U S WEST and a
9 CLEC would go through to forecast their
10 interconnection needs.

11 MR. BELLINGER: You're talking about network
12 planning?

13 MR. FINNEGAN: Yes.

14 MR. BELLINGER: Really not an operation
15 support system function.

16 MR. FINNEGAN: Well, you could consider it
17 part of the provisioning process in that you want to
18 make sure you've got facilities in place to handle
19 your needs. Forecasting process is and has been one
20 of the things that U S WEST requires of CLECs in order
21 to participate, and I believe in their latest Nebraska
22 SGAT, they also made participation in that
23 interconnection forecasting process conditioned upon
24 what type of data you would receive. If you
25 participated in the process, you would get one set of

1 reports. If you didn't participate in the process,
2 you got a different set of reports.

3 So U S WEST has intertwined the
4 interconnection forecasting process into the reporting
5 of performance data. That aside, AT&T would see
6 forecasting as part of the provisioning process.

7 MS. BEAUPRE: Are you still on that section,
8 AT&T? I've got an extra item for that particular list
9 on that section.

10 MR. BELLINGER: U S WEST, do you want to
11 comment any on this?

12 MR. CRAIN: Andy Crain with A -- U S WEST.
13 Certainly. Once again, I think we're talking about
14 greatly expanding the scope of the test. This is an
15 OSS test. The way that I believe AT&T's reading the
16 term OSS would include virtually everything, if not
17 everything, on the checklist. We cannot have
18 absolutely everything tested in this test. It's not
19 feasible. It's not desirable. I think this needs to
20 be limited, and I think it's properly limited at this
21 point to our relationships and our work with CLECs to
22 educate them and assist them in using the OSS
23 functions available to them, which is actually the FCC
24 test language that they use in their evaluation of
25 assistance regarding the OSS functions available to

1 CLECs.

2 MR. FINNEGAN: If I could respond, we see
3 this as an OSS issue in that apart from forecasting
4 being part and parcel of a provisioning process, U S
5 WEST has linked not only the reporting of performance
6 data but in some cases, the ordering of
7 interconnection trunks to participation in the U S
8 WEST-defined forecasting process. If this U S WEST-
9 defined forecasting process is to be one of the
10 conditions for participating in the ordering of
11 interconnection trunks, then it's quite within the
12 scope of the test to include that in the test of the
13 OSS support that they provide for interconnection.

14 MR. STEESE: May I respond to that one point.
15 Simply because we're differentiating in reporting data
16 separately if it's forecasted versus not doesn't
17 necessarily make it an OSS issue. I mean, the simple
18 fact is, if you're dealing with interconnection
19 trunking that -- excuse me. My partner here said that
20 he was with AT&T earlier, and I still am choked up
21 about it.

22 MS. LUBAMERSKY: He only said A.

23 MR. STEESE: Simply because it's being
24 reported differently under the performance measure
25 stated does not make it OSS.

1 If you're working collectively with the CLECs
2 to forecast joint responsibilities to install
3 interconnection trunks and all the sudden they lay a
4 number of unforecasted orders upon you, the point is
5 that we are planning just as they supposedly are to
6 build to their forecast. That does not make it an OSS
7 issue at all. That still remains a checklist item one
8 issue. And simply because it's reported in the
9 performance measures data doesn't thereby transform it
10 into an OSS issue.

11 MR. FINNEGAN: If I can respond, that was not
12 the only reason I'd give it. If you link the ordering
13 process to whether you participate or not participate
14 in the interconnection forecasting process as defined
15 by U S WEST, that also links it to the OSS and makes
16 it an OSS issue.

17 MR. CRAIN: I'm really not -- I don't really
18 understand what AT&T means by linking the ordering
19 process to forecasting. I'm not aware that we have
20 done that. And I think really whether or not -- we
21 can argue about whether or not things are linked or
22 not. Everything in these cases are linked together.

23 What they're really talking about here is --
24 and I think they've stated it best when they talked
25 about network design. They're talking about network

1 design collocation forecasting. Virtually everything
2 we do in terms of our network planning and
3 development, they want to have tested as part of OSS.
4 It's not appropriate to be tested as part of OSS. I
5 think that the Staff and DCI made a good judgment call
6 here, a reasoned judgment in terms of what should be
7 included in paragraph 7.6 and what should not be
8 included.

9 MR. FINNEGAN: If I could respond. We
10 haven't taken an all-encompassing view of
11 interconnection. We're just limiting it to the
12 forecasting process that's required by U S WEST to
13 participate in the ordering of interconnection
14 trunking and also the reporting of data associated
15 with interconnection.

16 We don't have a proposal out there to test
17 everything. We have a very finite limited proposal to
18 test the interconnection forecasting scenarios as
19 outlined in the New York Master Test Plan. There's
20 not a whole lot of them in there. Forecasting has
21 been an issue between CLECs and U S WEST for quite
22 some time in a number of different jurisdictions, and
23 it's reasonable to do an evaluation of how that
24 process works when you're evaluating the overall
25 adequacy of U S WEST's OSS.

1 MR. BELLINGER: Okay. Any other comments on
2 this particular issue? We'll take a look at it and
3 make a determination on this one.

4 MS. BEAUPRE: On this particular section 7.6
5 that AT&T raised, MCI WorldCom proposes that an
6 additional item be added to address the multiple
7 version -- the number of versions that U S WEST will
8 make available for its electronic interface,
9 particularly the EDI for preordering/ordering, and
10 that the adherence to the industry standard be
11 evaluated. If U S WEST purports to be on LSOG 3 or
12 EDI 10, that that be evaluated for adherence to those
13 arguments that they claim it to be in conformance
14 with.

15 MR. BELLINGER: Which standards are those?

16 MS. BEAUPRE: The OBF local service ordering
17 guideline standards as well as the EDI electronic data
18 interchange release versions.

19 MR. BELLINGER: Do you think they're
20 nonstandard or are you just wanting to make sure?

21 MS. BEAUPRE: Both. Yes, I believe they're
22 not in compliance with what the standards are
23 documented. And I think even more so, on a grander
24 scale, I think the entire change management process
25 has not been clearly defined. There is no process

1 that we feel has been established. We are now just
2 being contacted by U S WEST that there is a change
3 management process in place. We're not certain what
4 that documentation is, what the process is.

5 MCI WorldCom proposes that a separate process
6 or collaborative be established to identify, establish
7 and document this process. For example, the only
8 thing that we have noticed is that 21 days prior to a
9 release implementation, the documentation for that
10 release will be issued to the CLECs. So this October
11 31st major world conquering release, the specification
12 and details of this release will not be released prior
13 to 21 days to the CLECs of that implementation.

14 So we feel as though that a separate effort
15 be developed between the CLECs and U S WEST to define
16 a change management process that is amenable to all
17 parties. I think it would be very difficult to test a
18 process that I don't think we've all agreed to.

19 MR. BELLINGER: So you're recommending more
20 specifically on that part?

21 MS. BEAUPRE: A separate effort to be
22 established to identify a feasible change management
23 process with an associated document. We have some
24 good documentation here of testing the change
25 management process, a process that we feel is not in

1 place and is not supported by adequate documentation
2 for the CLECs.

3 MR. BUHLER: If MCI's talking about expanding
4 the scope of the test to include these things, I think
5 I'm left puzzled because the test already addresses
6 the change management process that U S WEST is
7 currently using. And so if it is efficient or it's
8 not efficient, the test will show that.

9 And if there's special attention given to
10 whether or not U S WEST complies with the latest
11 version of LSOG, I guess I'd like to make a couple of
12 points.

13 First, there's not an obligation to adopt the
14 latest version wholesale immediately after it comes
15 out. Businesses do that for good business reasons.
16 Adherence to or consistency with those versions would
17 be a part of any release -- any version that's
18 currently out there or any update to versions coming
19 out in a future release. So again, the scope of this
20 test would address that, and I see no additional need
21 to have attention on that.

22 MR. CRAIN: And if I can make a couple
23 points. This is Andrew Crain again. In terms of
24 testing the number of versions that U S WEST has
25 available of its EDI system that is part of the change

1 management process, we are going to -- we are going to
2 have two versions available. And I anticipate that
3 that would be encompassed here just for verification
4 that that's true.

5 In terms of having a separate -- I don't know
6 if it would be a separate collaborative process or
7 some separate process to create a new change
8 management process that allegedly everyone would agree
9 upon. I think that again is greatly expanding the
10 scope of what we're doing here.

11 I think the change management test is
12 appropriate in its scope right now. Right now, the
13 third-party is to ensure that U S WEST's system and/or
14 process change control methods are properly
15 communicated to CLECs effectively, based upon change
16 control procedures. And further on, that third-party
17 consultant will validate the procedure and monitor and
18 validate U S WEST's ability to execute them. I think
19 that's a pretty comprehensive look at the change
20 management procedures. I think it's an appropriate
21 way of handling the testing of those procedures. And
22 I don't think it's appropriate here to in the guise of
23 testing embark upon a whole new collaborative process
24 to talk about change management procedures.

25 MR. BELLINGER: It seems like that would be

1 outside the scope of an OSS test as a collaborative
2 effort. I'm not saying it's not needed, but it seems
3 like it would be outside the scope of the test.

4 MS. BEAUPRE: Well, it certainly wasn't in
5 Texas, and it was not in California, and there was a
6 separate effort to identify a comprehensive change
7 management process. I think we need to note the fact
8 that the CLECs had to build the electronic interfaces
9 that they currently utilize based on no change
10 management control process here.

11 This process seems to have just evolved and
12 developed in recent weeks, and we hear that the
13 testimony based on the change management process
14 that's been established and put up this past couple
15 weeks, a release that is yet to be documented to the
16 CLECs. And I think there's a lot of unknowns to that
17 release coming out except what's being said on the
18 record in some of these proceedings to CLECs who do
19 not even have the full release notice. And I thought
20 it would be to U S WEST's benefit if we went into this
21 effort to identify a change management process to get
22 a real true change management process that the
23 third-party could evaluate. At this point,
24 everything's being published as we speak, and
25 everybody's seeing it for the very first time. So I

1 think it's a disadvantage to see what the CLECs had to
2 use to build their systems up to this point. And is
3 it what the CLECs have put forth -- have had to work
4 with to build the systems.

5 MR. CRAIN: Addressing that point, I believe
6 that the test plan anticipates that the pseudo-CLEC
7 will provide a report in terms of the assistance and
8 documentation given by U S WEST to develop systems and
9 interfaces.

10 I don't understand why to develop an EDI
11 interface or an EB-TA interface the CLECs would be
12 relying on a change management procedure. There's
13 been no need to have a fully developed and documented
14 change management procedure and no need for versioning
15 because nobody had built to our interfaces, nobody had
16 built to interfaces that they needed to change.

17 The IMA are a little different. You don't
18 need to change your systems and adapt changes. And
19 mainly the changes to IMA at this point have been any
20 additional functionality, which only benefited CLECs.
21 I think that the test scope and procedure for the
22 third-party standard to evaluate the change management
23 procedures are completely appropriate here, and I
24 don't see any need to embark upon a whole new process.

25 MR. BELLINGER: But a pseudo-CLEC is to

1 evaluate the processes as they build the interfaces
2 and give a report on that. So that will be done
3 there.

4 MS. BEAUPRE: Will that evaluation entail the
5 evaluation of the documentation in accordance with
6 industry standards?

7 MR. BELLINGER: It's an evaluation of
8 documentation, and I would think it should be related
9 to the industry standards, yes.

10 MR. FINNEGAN: If I can make a follow-up, I
11 know at least in the AT&T/U S WEST interconnection
12 arbitration order, the ACC required compliance with --
13 required U S WEST compliance with national standards
14 for their interface. So to the extent that is part of
15 section 7.6 or the relationship establishment process,
16 to echo MCI's points, it would probably be reasonable
17 to see just how compliant U S WEST is with
18 Commission's previous order that their systems be
19 compliant with national standards.

20 And one follow-up. The U S WEST/CLEC
21 interaction, I don't think I've seen or heard anything
22 disagreeing with the need to have this evaluation
23 performed. I think if I read it properly, U S WEST
24 was recognizing the need for this. AT&T's primary
25 concern is that while there is agreement it needs to

1 be tested, the amount of detail in this very important
2 subject is sparse in comparison to the rest of the
3 Master Test Plan. We're looking at a fairly
4 significant item in an overall test that's got about
5 two inches of printed text supporting it.

6 MR. BELLINGER: That's paragraph 7.3, the
7 detail will be developed by the third-party, and
8 that's our intent, that they would develop the detail
9 of this test, and that would be developed prior to the
10 final as part of the final test plan, so there would
11 be no detail supplied.

12 MR. FINNEGAN: So does that comment -- we
13 provided a recommendation in the New York test. Was
14 that inappropriate, given that the third-party is
15 going to deal with that at a later date?

16 MR. BELLINGER: What part of that?

17 MR. FINNEGAN: We had in our comments
18 recommended a process to be used to develop in more
19 detail the intent of section 7.6. You responded by
20 saying in section 7.3 that the third-party consultant
21 is going to flesh out that section down the road. My
22 comment was, was it inappropriate for us to make a
23 recommendation at this point, given that section 7.3
24 says that this is going to be dealt with at a later
25 date?

1 MR. BELLINGER: I would think it would be
2 appropriate to furnish that to the third-party
3 consultant as a possible proposal.

4 MR. FINNEGAN: But later down the road. And
5 at this point, it's probably something we don't need
6 to talk about anymore?

7 MR. BELLINGER: Well, I think that's -- that
8 part will be developed down the road.

9 MR. FINNEGAN: And that's all right, too. We
10 will bring this up again, and I don't want to hear
11 "getting another bite at the apple" accusations tossed
12 at AT&T, as long as we're going to deal with it
13 another time, another day.

14 MR. BELLINGER: Andy.

15 MR. CRAIN: To address a couple of those
16 points, and I think these are legal technicalities.
17 We certainly don't argue with fleshing this out in the
18 future. To the extent anyone's going to be indicating
19 a great expansion of this paragraph or the scope of
20 what's being done here, we obviously are going to be
21 addressing that issue and asserting that it has been
22 addressed in this proceeding today.

23 However, I guess the final point I'd like to
24 make is the claim is that U S WEST believes this is
25 necessary and is agreeing that it ought to be in the

1 test plan. I believe what we said in our comments are
2 that given a perfect world, we would advocate that
3 this should be taken out and that this is unnecessary,
4 but in the spirit of cooperation, in the spirit of
5 understanding that the third-party DCI and the Arizona
6 Staff have made reasonable judgments in preparing this
7 test plan, we are not disputing or arguing that this
8 paragraph be taken out.

9 MR. BELLINGER: Good. Okay. Any other
10 comments?

11 MR. FINNEGAN: My final comment was I think I
12 heard we should expect accusations of trying to get
13 another bite at the apple on this issue later on. I
14 just want to make it clear for the record that has
15 been determined we will be addressing this issue and
16 it's not a completed issue.

17 MR. BELLINGER: In terms of the detailed plan
18 for the change management process test. As far as
19 testing that as far as the change management test.
20 Okay.

21 MS. BEAUPRE: I guess I have some clarifying
22 questions to ask, and I guess it falls under the
23 auspices of change management. I'm not certain, and I
24 don't know if I misread it. Is it safe to assume that
25 the environment will be the production environment

1 that will be tested and not the test environment of
2 U S WEST?

3 MR. BELLINGER: Production environment will
4 be tested, that's correct. Production environment.

5 MS. BEAUPRE: A follow-up question on that
6 would be, I believe that early this morning we
7 established that found errors will be corrected and
8 will have the retesting approach. I will assume,
9 then, that these changes will be made in the
10 production environment during the course of the
11 testing.

12 MR. BELLINGER: Yes, I would think so, before
13 the retest, yes.

14 MS. BEAUPRE: Will there be a change
15 management process evaluation during this process of
16 evaluating the changes based on these errors?

17 MR. BELLINGER: I would think so. That's
18 reasonable.

19 MS. BEAUPRE: Well, knowing that there will
20 be a major release in the October time frame and the
21 testing will probably be fourth quarter to first
22 quarter 2000, I'm assuming there may not be another
23 major release put out by U S WEST. I'm not quite sure
24 what their release schedule is. So I'm hoping that
25 there might be another major release that the

1 third-party vendor may be able to evaluate a major
2 release change management process. I was hoping that
3 we would say that we apply the change management
4 process notification of this 4.2 release as the
5 foundation, but I'm hearing from discussions that that
6 will be the baseline for testing and not the change
7 management process.

8 MR. BELLINGER: It would be released before
9 we start testing, so it would have to be the baseline.

10 MS. BEAUPRE: One last question on those
11 changes. I guess it's maybe a question for U S WEST.
12 What will happen during the Y2K moratorium? I
13 understand there's a November 15th through January 1st
14 moratorium on system implementations.

15 MS. NOTARIANNI: This is Lynn Notarianni from
16 U S WEST, and I just wanted to comment on a couple of
17 items that Carol asked.

18 First of all, as far as changes and changes
19 in the production environment, we don't do our
20 development in the production environment. So to the
21 extent that there needs to be any changes as a result
22 of testing and that's agreed to, I'd like to clarify a
23 couple of things.

24 First of all, I don't know that everybody in
25 the room stood up and made a blanket agreement that

1 would be New York-style military testing where any
2 problems that were identified would actually be fixed
3 and go into production and we would retest everything.
4 I think there was an assumption made there.

5 The second thing is we do all of our software
6 development according to quality software development
7 techniques. We will do the development and test it in
8 a very rigorous test environment before we put it into
9 production. So to the extent that we do have to make
10 a change and something has to be retested, we're not
11 going to put it into a production environment until
12 we've given it sufficient testing in a test
13 environment. But once that's done, we will put it in
14 the production box, and the retesting could happen at
15 that point in the production environment.

16 And Y2K. I answered this last time for Tom
17 Priday, and then Tom Dixon brought it up in his filing
18 again. It is a moratorium to the extent that we can
19 have a moratorium. Our Y2K testing is well on its
20 way. It's going very well. We do not expect to have
21 major problems. And to the extent that there is a
22 system change that needs to be made to support this
23 testing during that time frame, if it's vital to the
24 time frame and will help us keep on those time lines,
25 we're going to try and implement that change. If

1 something disastrous happens after January 1st,
2 obviously, that could change the conditions of what's
3 going on. But at this point, we expect everything to
4 go well through Y2K, and we would have the ability to
5 go back to our various systems development teams and
6 try and request that they put some additional
7 functionality in there, if it's required.

8 MR. FINNEGAN: I'd like to have a follow-up
9 comment on the Y2K issue. I haven't checked on it
10 lately, but in talking with some of AT&T's development
11 folks, we're in the process of attempting to develop
12 an EDI interface with U S WEST. And U S WEST has laid
13 down some restrictions on what we could or couldn't do
14 in our development process or mutual testing of those
15 interfaces because of Y2K issues.

16 I think to be fair, to the extent that U S
17 WEST is imposing development or software systems
18 restrictions on CLECs because of Y2K issues, those
19 same restrictions should be used during this test, and
20 we shouldn't see any special attention or special
21 treatment for getting around Y2K issues as part of
22 this test than we would see for CLEC development.

23 MS. NOTARIANNI: I don't want to get into a
24 debate about the development life cycle of AT&T's EDI
25 interface, but I think it's sufficient to say that

1 AT&T has delayed their development schedule on this
2 interface several times, and we've had quite a bit of
3 difficulty getting them to appoint a committee for a
4 development schedule with that.

5 Given that all normal activities that we do
6 are going to be subjected to that moratorium,
7 including the testing right now, if something comes
8 out that happens to be a bug in testing and we need to
9 fix it, and it's critical to this interface and what
10 the CLECs or what the ACC seem to be making the
11 interface workable, we can do it at that time. AT&T
12 and the CLECs have had the opportunity to build to our
13 interface since January 1st of 1998, and this simply
14 shouldn't be an issue for them.

15 MR. BELLINGER: Okay.

16 MR. WILSON: Ken Wilson representing ELI.
17 The change management section that is in the test plan
18 I think addresses versions of software that would be
19 coming out. My question is, -- kind of fits in here.
20 With the third-party tester, any CLECs that have
21 orders or the pseudo-CLEC are going through all of the
22 test phases, shouldn't there be a system set up so
23 that when problems are found, there's someplace to put
24 these problems? In other words, in development you
25 have a change management system or sometimes it's

1 called an MR system, a modification request system.

2 It occurs to me that this Master Test Plan
3 seems to be lacking that facility. That when someone
4 finds a problem, there needs to be someplace to put
5 that problem and codify it so that it can be tracked.
6 And if it is deemed by either the ACC or U S WEST or
7 the joint group that it is a problem that needs to be
8 fixed, it can then be tracked as it is fixed through
9 software changes. Right now, there doesn't seem to be
10 a mechanism where anyone can enter an issue or a
11 problem and make sure that something happens with it.
12 Either it's deemed to be not a problem or it is a
13 problem that needs to be fixed.

14 MR. BELLINGER: We identified early I guess
15 the first thing out of the box that we would have an
16 issue resolution process that we would adopt. It was
17 in the one that AT&T recommended with some language
18 changes, but we'll present that at the next workshop.
19 That would track I believe problems identified and
20 what happens. I think that's the process that we were
21 discussing first thing, and it should be able to track
22 required changes and follow up until they're changed.

23 MR. WILSON: Is that laid out in language yet
24 or that's just a proposal?

25 MR. BELLINGER: It's on page 19 and 20 of

1 AT&T's comments, and it came out of California.

2 MR. WILSON: Would all parties have access to
3 that to be able to address it?

4 MR. BELLINGER: Yes. And we would make a
5 couple of changes to that particular comment but not
6 much, and we'll present that in the next workshop.
7 But we pretty much worked through what those changes
8 will be. You must have missed the first part of the
9 session this morning. Anyway, I think that's going to
10 handle what your question is.

11 MR. WILSON: I guess I didn't hear enough
12 formality addressed in that.

13 MR. BELLINGER: It's pretty formal. It
14 documents the issues.

15 MR. WILSON: That's an exception process.
16 You really need to be able to track this through. And
17 that's what I was getting at. To track it through if
18 something is deemed necessary to go back through U S
19 WEST development, how do the parties assure themselves
20 that resolution is addressed and that the changes are
21 made and it's back through and retested. I mean, it's
22 one thing to have exception capability, but to be able
23 to track it through the subsequent development process
24 is something else. So that's where I saw the
25 disconnection or not a complete -- not a system --

1 MR. BELLINGER: U S WEST will respond in
2 writing what fixes they have made.

3 MR. WILSON: I'm used to the development
4 world, where the parties involved see the process as
5 it occurs and the resolution is tracked in the
6 modification system or something of that nature.
7 People that have been in the development world
8 understand what I'm trying to get at here, is it's
9 different from just an exception process. It's a
10 tracking mechanism to make sure that exceptions are
11 resolved.

12 MR. BELLINGER: Well, it's problems as well
13 as exceptions. Whatever problem is identified, we
14 said we would identify it and decide whether or not it
15 needed to be fixed. And if so, give it to U S WEST,
16 and they would respond in writing what their fix was.
17 And if it was deemed necessary, we'd retest it. I'm
18 not sure what additional you would want to do.

19 MR. WILSON: I could put something in
20 writing. Maybe that would be most appropriate.

21 MR. BELLINGER: Okay, that would be fine.

22 Any other comments on this test or on that
23 particular issue? I guess the next one is the
24 capacity test.

25 MR. FINNEGAN: Believe it or not, I think

1 we're ahead of schedule, and I'll do my best to keep
2 us ahead of schedule.

3 MR. BELLINGER: You're doing fine.

4 MR. FINNEGAN: Our primary concern with the
5 capacity test as it's outlined is it doesn't reflect
6 enough real world conditions. It's kind of like doing
7 your EPA gas mileage calculation, but you're doing it
8 in the Bonneville Salt Flats, and you start once and
9 stop once and then calculate your miles per gallon
10 based on that.

11 So it is with the Master Test Plan. It's
12 setting up capacity test but only under the best of
13 conditions, and it's excluding we think too much some
14 of the weaker links in the ability to process OSS
15 transactions. I'll give you a few examples.

16 The capacity test or some of the
17 functionality appears to exclude the mandatory manual
18 processes that are inherent in the processing of CLEC
19 orders. So to the extent you don't include that in
20 there, you're not getting a true picture of U S
21 WEST's --

22 MR. BELLINGER: What is not included? I'm
23 sorry.

24 MR. FINNEGAN: Some of the manual steps
25 required to process CLEC transactions, whether it's

1 providing a FOC. And I know some of this is
2 purportedly going to be addressed in the next version
3 of IMA, but it's my understanding there still may be
4 some manual processing in what is purportedly flow-
5 through orders. My understanding of the Master Test
6 Plan capacity test was it was focused on the hardware
7 and software. How can their hardware and software
8 support CLEC transactions. That's only part of the
9 process. There are other mechanized and manual
10 processes that also need to be included to give a true
11 reflection of real life.

12 The issue is some of the capacity tests are
13 only using clean LSRs. Again, that's not real life.
14 There are going to be bad LSRs or LSRs with errors
15 sent for any reason. And to exclude them from
16 consideration in the capacity test is not going to
17 give you a true reflection of what U S WEST's ability
18 is to handle real world CLEC orders. Real world is
19 they're going to have some bad LSRs. It's going to
20 take more time or could take more time to handle bad
21 LSRs in the process than clean LSRs. So you need to
22 get some representative sample of bad LSRs in the
23 capacity test, as well.

24 Another issue was --

25 MR. BELLINGER: Did anything come out of the

1 Texas test of that that made you comment on that, the
2 Texas test of capacity?

3 MR. FINNEGAN: What concerned us about some
4 of the Texas capacity test is it did not go far enough
5 into the process for some of the types of orders.
6 There were orders that may have successfully been
7 accepted into Southwest Bell's service order
8 processor, but when it came time to put the customer's
9 service, the customer lost dial tone. And that was
10 not necessarily always reflected in the test results.
11 There were decisions made for whatever reason that for
12 this part of the capacity test, they were only going
13 to look at the ordering. Provisioning was not part of
14 the examination. And even though the customer lost
15 dial tone, that was not considered part of the
16 capacity test.

17 The other issue was there was a statement in
18 the Master Test Plan that the capacity test does not
19 address the downstream provisioning systems in which
20 CLEC-initiated traffic and U S WEST-initiated traffic
21 are combined. Those systems are considered mature and
22 not in need of testing since they are part of U S
23 WEST's retail operation.

24 While the systems themselves may be mature,
25 U S WEST is using them in different ways, and for CLEC

1 orders there are multiple service orders that are
2 generated from one CLEC LSR. Apparently, U S WEST has
3 had some difficulty in coordinating the multiple
4 service orders that are necessary to provision or
5 provide for CLEC needs, and we think the capacity test
6 should also evaluate U S WEST's ability to handle
7 these types of related orders or associated service
8 orders of U S WEST systems as they're provisioned.

9 Another comment on the provisioning capacity.
10 It might have been in there, but I don't know if it
11 was clearly in there. Provisioning should be defined
12 to include actual installation of services as well.
13 In some cases, the weak link in the process in terms
14 of -- or the bottleneck in terms of how many orders
15 can be provisioned or installed would be the actual
16 physical installation of it. I'm thinking of
17 unbundled loops in particular. There's probably some
18 limit on how many loops can be installed in a given
19 day in a central office. That's probably a legitimate
20 area of investigation for the capacity test.

21 MR. BELLINGER: So you would say that they
22 should have the capacity available for completion of
23 orders for the fourth quarter of 2000 at this point in
24 time?

25 MR. FINNEGAN: I'm not saying that. I'm just

1 saying, it's worthwhile to know what their true
2 capacity is, and I'll give you an example. Their
3 hardware and software may be able to process 10,000
4 UNE loop orders a day. But if you can only process 20
5 in a central office in a given day, does it help or
6 does it provide any useful information if their
7 hardware and software can do 10,000, but the real
8 world is they can only do 20 in a given day? So the
9 capacity test needs to include considerations of where
10 the bottleneck is in the provision of particular
11 services, and the test cases should be developed to
12 try to reflect real world information that gives you
13 real world information on what U S WEST's present
14 ability to support CLEC orders are.

15 MR. BELLINGER: Andy, do you want to comment
16 on that?

17 MR. CRAIN: I'd first like to address, and I
18 think two of these go hand in hand, the testing of the
19 volume or capacity on manual processes. I think
20 that's the same issue as we're going to have with the
21 installation of services and capacity test. AT&T has
22 admitted here that they're not asking us to staff to
23 the level that we need to by the end of next year now.
24 To actually test capacity at that level now would
25 require us to hire and train all sorts of new people

1 that we will be hiring and training over the next few
2 years to meet those projected needs.

3 I don't think U S WEST can support a test
4 plan that would require us to hire and train some
5 people, get them on line, have them work with being
6 able to handle this capacity that's quarters and
7 quarters out and then either just have them sit on
8 their hands for the next year and a half or fire them.
9 I don't think that's a good way of handling it.

10 As a practical matter, there's only one way
11 to really test or evaluate those issues, and it's
12 not -- maybe not 100 percent certain like everybody
13 would like it to be, but it's really the only
14 practical way anybody has of dealing with this issue.
15 And that issue I believe has been handled in section
16 6.10 and 6.11 of the test plan, where the third-party
17 will evaluate scalability of both systems and
18 personnel. We'll evaluate our procedures and
19 resulting or surrounding issues basically to figure
20 out and evaluate whether or not we have the
21 appropriate procedures in place to be able to deal
22 with increased demand. That's really the only way of
23 testing these issues, and it's really the only
24 practical way of handling this issue.

25 MR. FINNEGAN: If I could respond to that.

1 We're not certainly saying they need to staff up to
2 end of year 2000 levels now. But sometimes worse than
3 no information is misleading information. To give you
4 an example, I've seen U S WEST bandy a number about
5 that their systems have the capability of processing
6 10,000 LSRs per CLEC per state per -- I forget if it's
7 day or week. Does that mean they can actually do that
8 many orders in a day? Of course not. They can't do
9 that many orders in a day. They're limited by their
10 installation. And to tell you what I don't want to
11 happen, I don't want a capacity test that comes out
12 with a number that says, capability of their hardware
13 and software to process orders is 10,000 LSRs per CLEC
14 per state per week, because that's not useful
15 information. That implies that U S WEST has the
16 capability to process more orders than they truly do.

17 What AT&T's advocating is if you want to talk
18 about capacity, you have to think of it in terms of
19 end to end. And at the end of the day, how many loop
20 orders do they have the capacity of providing today.
21 We're not saying they have to staff up to end of 2000
22 numbers. But today, how many loop orders can U S WEST
23 place in a day? How many retail orders? How many DSL
24 loop orders can U S WEST place in a day? What's not
25 going to be valuable is if you just take a part of the

1 process, put it in the best possible light under the
2 best possible circumstances, and then come up with
3 numbers that purport to be the capacity.

4 MR. BELLINGER: What is useful information is
5 that the operation support systems have capacity.

6 MR. FINNEGAN: To my earlier comments,
7 operation support systems also include the personnel
8 and the processes, and they don't have to be defined
9 only by the hardware/software bits and bytes. At the
10 end of the day, how many can they do? And yeah, it's
11 useful if they can do 10,000 a day in their hardware
12 and software, that's good. But if their installation
13 limits them to only a couple hundred a day, that's the
14 more relevant information.

15 MR. MARTIN: Just to echo the points being
16 made by AT&T, many times what we're finding as a
17 practical matter, the upper limitations of what U S
18 WEST is capable of delivering is not necessarily a
19 factor of a hardware or piece of hardware or piece of
20 software. Many times, it is very specifically
21 insufficient tech force to dispatch or not enough
22 personnel in a specific work center to answer the
23 phones in a timely manner or those types of issues end
24 up becoming the bottleneck. So I would just like to
25 echo the importance of including many of those manual

1 procedures and processes as part of the evaluation.

2 MR. BELLINGER: Okay.

3 MR. BUHLER: Dean Buhler with U S WEST. I
4 guess I'd just like to reiterate in a nutshell, if you
5 have actual usage and you have information about
6 actual usage that shows we're meeting current demand
7 and the test shows that the functionality performs the
8 way that it is supposed to and you have the capacity
9 test that shows that the systems themselves can handle
10 the loads and you have the scalability that has passed
11 the test that shows that we have the right processes
12 in place to meet demand with the necessary systems and
13 personnel in the future, it seems to me that with all
14 the information coming from those four or five points,
15 you've made the determination that you need to make.

16 MR. FINNEGAN: If I could comment on that --
17 I'm sorry. Were you finished?

18 MR. BUHLER: Yes.

19 MR. FINNEGAN: If I could comment on that,
20 there were a lot of "ifs" in Dean's statement. And I
21 haven't quite concluded if the "if" statement has met
22 the conditions that Dean has outlined. That's what
23 we're going to try to do in the capacity test, see if
24 those "if" statements have been met.

25 MS. BEAUPRE: MCI WorldCom doesn't

1 disagree -- agrees with AT&T's premise of capacity
2 test as well as OnePoint. And I think perhaps
3 additional clarifying words in the document may
4 assist. I know MCI WorldCom would feel a lot more
5 comfortable in the fact that there were more words to
6 the effect that all of the available OSSs are being
7 tested simultaneously. What we're trying to do is
8 demonstrate whether or not U S WEST's systems are
9 capable of handling a world of full competition.
10 There are going to be small CLECs using their IMA GUI,
11 graphical user interface, and there will be the CLECs
12 using the EDI interface. While it is good that the
13 document identifies the preorder and ordering systems
14 being tested, I would like to request that additional
15 words be added to identify all of the interfaces will
16 be tested simultaneously so that while you've got an
17 EDI transaction being processed for preorder that the
18 IMA GUI hitting the same database doesn't have a
19 conflict.

20 One of the inherent problems with the problem
21 in Texas was it was a controlled environment. A
22 capacity test was run on a Sunday evening while the
23 production system was down, and the test system was
24 there, and Southwestern Bell were standing there
25 waiting for this identified volume of orders.

1 Certainly not blind, certainly not a true capacity
2 test. So I think what we want to do is eliminate the
3 fact of having a biased capacity test to have a really
4 truly robust capacity test, have it mixed with
5 production orders, run all the preorders and ordering
6 simultaneously to make sure that this is truly a
7 capacity scalable for potential promotional type of
8 activities that CLECs may have.

9 MR. BELLINGER: My understanding of their
10 test was that they ran volume throughout the day at
11 target levels, varying busy hours. It looked to me
12 like from an order standpoint that the volumes were
13 being tested in their system, and that was my
14 understanding.

15 MS. BEAUPRE: During the functional testing,
16 it was. The initial capacity test was run on a Sunday
17 evening. They called it a controlled run to identify
18 that volume. It was through -- after a lot of
19 protests --

20 MR. BELLINGER: The report indicated an all-
21 day test.

22 MS. BEAUPRE: It was a second production and
23 capacity run. But to evaluate capacity runs --

24 MR. BELLINGER: What they would be doing is a
25 capacity test with the orders being input that would

1 be testing all of the system. That would be the
2 intent.

3 MS. BEAUPRE: Correct. I think there would
4 be a lot of discussions and a lot of identification in
5 terms of the volumes of orders going through by -- all
6 of the parties would be submitting orders and at what
7 time. Obviously, if we're thinking of submitting 100
8 orders per hour, it isn't testing the capacity of a
9 system.

10 MR. BELLINGER: And we talked about busy hour
11 in here and adjusting for that, and making sure that
12 we have a diversity type of input. And that seems to
13 me, that should test those systems.

14 MR. BUHLER: And U S WEST does not have a
15 problem with the capacity test doing IMA orders and
16 EDI orders as an example at the same time. And for
17 IMA, maintenance and repair, to do those together, U S
18 WEST does not have a problem with that.

19 MR. BELLINGER: Okay. Any other comments on
20 the capacity test?

21 MR. FINNEGAN: We have one final comment I
22 missed the first time along.

23 There appear to be considerations in the
24 Master Test Plan for increased levels of volume during
25 the capacity test. But it didn't look like what we

1 would characterize stress levels of volume where a
2 CLEC might have a marketing program going on and get a
3 significant spike in the number of orders. That's a
4 real world situation that's likely to happen. We
5 didn't see that type of stress volume included in the
6 capacity test for the Master Test Plan. We think
7 that's something that should be included in there, and
8 we made reference to a stress test that we think was
9 in the New York test plan that we think would work
10 well in Arizona, and that's in our written comments.

11 MR. BELLINGER: What volumes would that be?

12 MR. FINNEGAN: I believe they had it at
13 subject to check, 150 percent of whatever they figured
14 the steady state volume was for New York. But I'm not
15 exactly sure on that. 150 percent level.

16 MR. BELLINGER: So they should be able to
17 handle 50 percent additional capacity to their normal
18 volume? Is that what you're saying?

19 MR. FINNEGAN: Correct.

20 MR. BELLINGER: So they should be able to
21 have 50 percent more than their normal volume?

22 MR. FINNEGAN: Correct, or whatever the
23 baseline volume is determined to be for purposes of
24 capacity. I know that baseline volume is yet to be
25 determined and I'm sure will be subject to much more

1 discussion.

2 MR. BUHLER: I guess my assumption in reading
3 the Master Test Plan was that the consultant, the
4 third-party, using a number of different factors,
5 would help determine what the surge was going to be,
6 one of the inputs being the forecast of the CLEC, what
7 their volumes were going to be during the purported
8 year 2000. It seems more reasonable to me that the
9 surge would be based in part on that because it's
10 steeped in reality, rather than picking an arbitrary
11 150 percent from the New York region. And I guess
12 that was my reading of the Master Test Plan.

13 MR. BELLINGER: It would be based on
14 forecasted volumes and some additional volumes for
15 diversity data or other occurrences that may come
16 along, and then evaluation would be made of the
17 capacity of those systems based on that and what
18 actually happened. It seems to me that's a pretty
19 fair test of whether those systems can handle the
20 projected volumes or not.

21 But like you said, that would be discussed
22 if a pseudo-CLEC comes on the scene and sets up the
23 final test requirements. But they should be set up --
24 I think it would be a fair test and not some -- 50
25 percent seems like a lot of extra to require. But at

1 the same time, we will be evaluating the scalability
2 of those systems. And we'll be looking at if those
3 volumes do start occurring at a much higher level, are
4 the systems scalable up to handle those higher
5 volumes. I think that's fair that they can do that.

6 MR. FINNEGAN: As a follow-up, the debate's
7 going to be on the -- in terms of the 50 percent,
8 that's not unreasonable. I know in California, we had
9 a market trial on resale of service. Without
10 advertising, without much marketing, we got I think it
11 was 15,000 calls in the first two days. So you're
12 looking at one CLEC without marketing doing 7,500
13 orders immediately after the news got out that there
14 might be an alternative to Pacific Bell.

15 MR. BELLINGER: Again, like I said, the
16 scalability issue, if you develop a plan like that,
17 that first of all, you would have to staff up to be
18 able to write the orders to some degree. And then
19 when you look at their ability to respond to those
20 kind of increasing levels, you'd have to say, they
21 should be planning for forecasted ability and then
22 some diversity accounted for. But if you came up with
23 a program that exceeded that, then what we're looking
24 for, do we have the systems in place to scale up their
25 systems to handle those additional volumes on more of

1 a plan basis than just having the volume sitting there
2 just in case. So I think it would be evaluating what
3 their systems can do and are they scalable in cases of
4 where new programs come along, which I think would be
5 a fair test.

6 MS. TRIBBY: This is Mary Tribby with AT&T.
7 I don't know that you have to necessarily set a
8 criteria today. I mean, I think that that's something
9 that the third-party can weigh in on and the test
10 generator as well.

11 I think you do have to realize, though, that
12 local competition in Arizona and really across the
13 country is still in its infancy. So you do want to
14 have a test of these systems that will prove useful
15 next year and the following year when hopefully the
16 volumes of competitive alternative local service
17 providers do greatly increase. So I think both you
18 need to be in a position to measure the spikes, but
19 you also have to just in measuring capacity remember
20 that the FCC wanted an evaluation of reasonably
21 foreseeable commercial volumes and recognize that what
22 you see at any day and time probably does not rise to
23 that level.

24 MR. BELLINGER: That's the purpose of
25 building a system and testing it, that nobody has

1 those systems in place. We build a system and a
2 transaction generator to make those tests.

3 We'll take a 15-minute break.

4 (A recess ensued.)

5 MR. BELLINGER: Let's go ahead and continue.
6 Any more comments about the capacity test? I think we
7 pretty well finished that one. No more comments on
8 that?

9 (No response.)

10 MR. BELLINGER: The next area is -- I'm not
11 sure if it was on the agenda, but it's a test. A
12 performance measurement evaluation. I don't want to
13 get into the performance measurements at this time,
14 and we'll talk about it a little, but I do want to
15 talk about the performance measurement evaluation and
16 get your input on that. Several of you had some
17 inputs, so let's talk about that particular area. Who
18 would like to go first?

19 MR. FINNEGAN: I'll go out of character and
20 speak first.

21 MR. BELLINGER: Sure, you've been doing good
22 at that.

23 MR. FINNEGAN: We think from a process point
24 of view, the performance management evaluation should
25 be done if not the first step in the process, very

1 early on in the process. Performance measurements are
2 going to be the yardstick against which we partially
3 determine how good or how not so good U S WEST's OSS
4 access is. And it's quite important that we
5 understand this yardstick as early on in the process
6 as possible.

7 If we don't, and we leave that to the latter
8 part of the evaluation, we're risking the possibility
9 that we may have to do some retests if we haven't been
10 properly measuring the collecting data or assumptions
11 we had been making along the way because reliance upon
12 the data may not have been valid assumptions.

13 So AT&T just urges that we look at the
14 performance measurement evaluation as soon as
15 possible.

16 MR. BELLINGER: I think that's a good
17 observation.

18 MR. CRAIN: U S WEST does not disagree with
19 that statement, with some caveats. We also agree that
20 the performance measurements evaluation should begin
21 as soon as possible.

22 I don't think that complete -- passing
23 completely the performance measures evaluation should
24 be an entrance criteria for starting the test. There
25 are certain performance measures that will be relied

1 upon by the capacity test and the functionality test.
2 And certainly those need to be evaluated early on in
3 the process to determine if the proper numbers are
4 being collected. Rather than any sort of strict cut-
5 off like that, the third-party consultant with the FCC
6 certainly ought to determine whether or not we can
7 begin testing.

8 MR. BELLINGER: What was the last part of
9 that?

10 MR. CRAIN: The third-party consultant with
11 the FCC ought to be able to determine whether or not
12 the necessary performance measures are in place to
13 begin testing.

14 MR. BELLINGER: Okay.

15 MR. FINNEGAN: If I can respond to this, and
16 this may be a first, I'll agree in part with Mr. Crain
17 that we don't need a complete resolution of all of the
18 issues or complete measurement of the performance
19 measurement evaluation before we start on other parts
20 of the test. At the very least, if there are
21 unresolved issues we'll know that they have produced
22 as a result of those processes, it's questionable at
23 the moment, and it may be resolved. But it is
24 important to identify those disputes and, to the
25 extent there are disputes, if we identify them early

1 in the process, it's a better bet we'll get them
2 resolved before the end of the process.

3 MR. BELLINGER: That's good. Okay.

4 MR. CRAIN: This may be a first, too, but I
5 agree.

6 MR. BELLINGER: It must be getting late in
7 the day.

8 Okay, I think that's a good suggestion, and
9 we'll incorporate that.

10 Any other comments on the performance
11 measurement evaluation?

12 MS. BEAUPRE: Perhaps this is my limited
13 knowledge of performance measurements and its process
14 of evaluation; however, I guess I seek clarification
15 as to the historical data evaluation on whether it
16 would be U S WEST providing the raw data to the
17 third-party consultant and the third-party consultant
18 determining the performance measurements or that U S
19 WEST would be calculating the performance measurements
20 and that would be evaluated by the third-party
21 consultant. Obviously, MCI WorldCom would prefer the
22 former, that the measurements be based on the data,
23 simply the data provided by U S WEST.

24 MR. BELLINGER: My intent would be that they
25 would look at the data, look at the source of data,

1 and then make the computations. But specifically,
2 evaluate the source of the data as well as make the
3 calculations.

4 MS. BEAUPRE: Okay. Thank you.

5 MR. FINNEGAN: If I can respond to that, in
6 addition to the source of the data, how the
7 calculation is being done, I think the evaluation also
8 needs to consider whether the treatment of the data is
9 appropriate or consistent. To give you an example, in
10 average installation interval data, it came out on
11 cross-examination in Nebraska that there appears to be
12 inconsistent treatment of that same measurement for
13 data for U S WEST results and CLEC results. I'm not
14 sure I can recite exactly the business rules, but the
15 crux of it is for average installation intervals,
16 sometimes longer interval orders such as customer
17 requested due dates longer than standard installation
18 interval are excluded from CLEC results, but those
19 longer interval orders may be included in the results
20 for U S WEST results.

21 So when you include shorter -- or you exclude
22 longer interval orders from the CLEC results and
23 include those same type of longer interval orders in
24 U S WEST's results, you may be properly following the
25 business rules, but the business rules may not be

1 correct to begin with.

2 The performance measurement evaluation should
3 also evaluate the appropriateness of the data
4 treatment and ensure that to the extent reasonable,
5 the data is treated consistently between U S WEST
6 results and CLEC results.

7 MR. BELLINGER: Okay.

8 MR. WILLIAMS: This is Michael Williams with
9 U S WEST. Our performance measurements consistently
10 exclude from interval measurements those orders which
11 are requested beyond standard intervals. So that what
12 we end up measuring is U S WEST's performance, not
13 some interval that the customer wanted to be longer.

14 The situation I think that Mr. Finnegan is
15 referring to in Nebraska was not a reflection of what
16 we are measuring and reporting and is not a function
17 of our SGAT as filed either here or in Nebraska; but
18 rather, I think he's referring to a situation where we
19 offered some anecdotal information related to a
20 comparison of some retail results. That particular
21 anecdote did not exclude customer requested due dates,
22 but our other measurements that we do produce
23 regularly and which are produced consistent with our
24 performance indicator definitions do consistently
25 exclude those things. I'm not arguing against

1 evaluating the treatment but just correcting the
2 perception that was obtained there in Nebraska.

3 MR. BELLINGER: Okay.

4 MR. MARTIN: Scott Martin with OnePoint
5 Communications. A couple of comments with respect to
6 the performance measurements. These fit under the
7 guise of evaluation. And we will file specific
8 comments with respect to the performance measurements
9 that have been proposed. But a couple of general
10 comments would be we would caution against and
11 recommend against uses of averages as a mechanism for
12 evaluating performance. And alternatively, we would
13 propose that a statistical distribution with a
14 corresponding threshold be established for each of the
15 performance measures that are being discussed. Too
16 many of the unfortunate circumstances can be hidden
17 when it's averaged over 25,000 orders or whatever the
18 number is.

19 Second point is that we believe it's
20 important to look when defining the performance
21 measures at what is important to the customer. Some
22 of the measurements that have been proposed by U S
23 WEST -- and without citing any specifically at this
24 time, some of them appear to be measuring interim
25 steps within U S WEST's own process as opposed to when

1 service is delivered to the customer or some other
2 salient aspect of delivery. And we believe that it
3 needs to be looked at from a customer's viewpoint,
4 what's important to the customer, and that the
5 relevance of an interim step being established really
6 is irrelevant. And that they need to be customer and
7 outcome oriented.

8 Third comment we would make is that we'd like
9 to see more specificity around the math and the
10 targets. And it does appear in U S WEST's proposal
11 Appendix B that they have put a fair amount of
12 specificity and math into that. We would like to see
13 that developed and agreed upon with the CLECs. And
14 again, as I said, we would be making some specific
15 comments to their proposal around how the metrics or
16 measures would be calculated, the data gathered, and
17 the specific targets that would be considered
18 acceptable.

19 And then fourth, we would also echo the
20 comments made by MCI in the first workshop about we
21 believe that some proactive definition around the
22 outcomes associated with the measurements needs to be
23 agreed upon before actual measurements are initiated.
24 I think if I remember correctly, the MCI proposal
25 discussed based specifically upon the experience in

1 Texas that there were at least categories of pass,
2 conditional pass, and fail. And there needs to be
3 clear agreement amongst all the parties as to what the
4 categories are going to be and what the repercussions
5 are if any one of those categories is hit. If a fail
6 happens on a specific measure, what does that mean?
7 Does that mean you continue testing and that one fail
8 in the context in the rest of the measures is fine or
9 does it mean something different than that?

10 That would be our four comments.

11 MR. BELLINGER: Okay. Any other comments on
12 the performance measurement evaluation?

13 (No response.)

14 MR. BELLINGER: I guess the final area, then,
15 would be, are there any overall comments about the
16 Master Test Plan that we haven't gotten to?

17 MR. FINNEGAN: AT&T's got a comment. This
18 will go back to some earlier comments we've made on
19 the technical advisory group, as well.

20 MR. BELLINGER: We'll discuss the technical
21 advisory group next.

22 MR. FINNEGAN: One of AT&T's overall concerns
23 is pretty significant, is that this process should be
24 open to all parties and documented. We've got some
25 concerns and we hope it's more out of it wasn't

1 intentional, but we're seeing parts of the process so
2 far that don't appear to be open. The production of
3 the RFP, the distribution of the RFP and the selection
4 of the third-party vendor does not appear to be an
5 open process. The actual RFP, I don't know what
6 mechanisms were out there that we may have availed
7 ourselves of, but today is the first day we had heard
8 an RFP was out and was able to obtain a hard copy of
9 it, get the RFP and see that the third-party vendor is
10 to be selected Friday.

11 No. 1, we're not quite sure what the process
12 would be to select that third-party vendor; and No. 2,
13 we think in the spirit of an open process, it would
14 have been nice if we had known what was going on or
15 had known that there was a process and perhaps have
16 had some input into the RFP proposal itself. It would
17 also be nice if there was some mechanism for all of
18 the parties to have some input into the selection of
19 the third-party consultant, as well. It's going to be
20 a significant step in the overall collaborative test
21 process, and so far, it looks like it's excluded CLEC
22 input.

23 Another concern is -- I don't know if it's
24 happened or not, but it appears that DCI has had some
25 discussions with U S WEST. Certainly that would be

1 appropriate if it did have, and I don't know if it has
2 happened. But if it did happen, in the spirit of an
3 open process, I think it would be helpful if minutes
4 were taken and there were at least some indication of
5 what was going on in the discussions, if there were
6 any, between U S WEST and DCI. I guess I've got a
7 question, I don't know if it's for the Staff or for
8 DCI, in terms of what the openness of the process is
9 going to be going forward. Is that something we might
10 talk about?

11 MR. BELLINGER: I think we can talk about
12 that along with the advisory group, about the openness
13 of the process. That would be where we would do that.
14 So if you want to, we can move -- I was wanting to
15 finish up if there were any other overall comments.

16 MR. FINNEGAN: One other overall comment. We
17 started off the session by indicating the pseudo-CLEC
18 and the third-party consultant or third-party vendor,
19 while different functions, could be the same vendor.
20 And we're not so sure if that's a good idea as an
21 initial premise, and we might discuss the pros and
22 cons of that occurring. It's still subject to change.
23 We might discuss the pros and cons of potentially
24 having one vendor as both the pseudo-CLEC and the
25 third-party consultant.

1 MR. BELLINGER: Yeah, that's fine, if you'd
2 like to comment on that. This would be a good time.

3 MR. FINNEGAN: Do you want to talk about the
4 openness issues first?

5 MR. BELLINGER: You're referring to the
6 advisory group moving forward or --

7 MR. FINNEGAN: You'd probably set aside the
8 advisory group as a third issue. As the issue is
9 going forward, what does the Staff see in terms of the
10 openness of the process?

11 MR. BELLINGER: Like I said, we would
12 recommend as an advisory group that would be reviewing
13 the process, the progress of the test, inputting into
14 the final test plan along the way. So that it would
15 be open in terms of those kinds of issues. Is there
16 something additional you're looking for or what would
17 you like to see?

18 MR. FINNEGAN: Well, in the context of the
19 technical advisory group, I think it would be
20 appropriate if the technical advisory group had a role
21 or at least input on the selection of the third-party
22 vendor and the pseudo-CLEC. I don't see that so far.
23 And if I understand the way the process works, by
24 Friday, there's going to be a third-party consultant
25 selected.

1 MR. DOHERTY: The proposals were due Friday.

2 MR. MOTYCKA: Staff had -- in the first
3 workshop, we alluded to the fact that the RFP had
4 already been sent out. So this is not your first
5 notification that Staff has done anything such as
6 that. The proposals were due to be back to this
7 Commission last Friday, the 17th. We had requests
8 from a variety of vendors asking for an extension of
9 time. We extended that to this Thursday, close of
10 business, of which if any party has submitted a
11 proposal, they have the option of pulling it back and
12 resubmitting or leaving their proposal which has not
13 been reviewed yet.

14 It was Staff's intent to not include other
15 parties within the selection process of the vendor.
16 We welcome comments in today's session if parties
17 disagree with that concept. We had planned on
18 gathering the RFPs, reviewing them, analyzing them,
19 calling in the associated interested parties for an
20 interview, and making a determination relative to
21 which party or parties would be the most appropriate
22 to conduct this test.

23 Now, obviously, if the CLECs want to be
24 involved, then U S WEST would need to be involved in
25 this process, of which they're not. The process of

1 selecting the vendor is dependent upon Staff and its
2 consultant, DCI. My apologies to those that did not
3 know the RFP went out. It is in the transcripts from
4 the prior meeting of September 10th. I believe it was
5 the 10th. The 9th. There was an offer -- if anyone
6 wanted to see them, they were produced again today. I
7 don't recall if they were produced in the previous
8 meeting or not. Staff does not have any intentions of
9 coming to closure immediately upon the submissions.
10 Obviously, there's going to be quite a bit of data
11 that needs to be analyzed by not only the Commission
12 but our consultants, as well. And I'd be lying if I
13 was to say that the decision would be made by the 30th
14 of September. I just don't know until we see who
15 proposes what. We have taken into consideration other
16 RFPs. The RFPs that this Commission has issued, other
17 states have issued, Texas, California. We have looked
18 at those. We've incorporated some thoughts. We've
19 put our own language together. And that's where the
20 RFP is at this point. And I open it up for dialogue
21 if there's a need for the parties to want to address
22 the selection process.

23 MR. WILSON: Ken Wilson representing ELI. I
24 guess some of us were in Nebraska on the 9th and were
25 not able to participate in this meeting. I'm a little

1 surprised that the RFP was issued so far in advance of
2 this meeting because it was my understanding that this
3 meeting was to discuss the third-party testing plan.
4 And if any of the comments here expanded the scope of
5 that, then I would assume that the -- some of the
6 third-party submissions might be a little off. So I
7 guess that kind of caught some of us by surprise, as
8 well, that -- I mean, if I were submitting a third-
9 party proposal, which I'm not, it would have seemed to
10 me like this meeting could have had an impact on what
11 I would be submitting and on the RFP itself.

12 MR. MOTYCKA: Again, David Motycka on behalf
13 of Staff. You're correct in one aspect that there is
14 value for those individuals that are going to bid on
15 this product to have insight relative to what's going
16 on. I know there are four of the consultants here
17 today that are aware of these meetings. All the
18 consultants that we sent out the RFP to are aware of
19 these workshops. Many of them have called in to the
20 listen line to what's going on, and the transcripts
21 are available to them relative to why Commission Staff
22 elected to do it before.

23 This process is not a short-term process, and
24 we delivered the best guess draft master plan that we
25 could do. Obviously, the final product will not be a

1 reality until after the third-party tester comes on
2 board. In fact, as part of the RFP, we alluded to the
3 fact that there are going to be modifications
4 necessary, contract changes that may be needed
5 relative to any of the changes that are made in this
6 forum and going forward with the draft RFP.

7 So we may differ on our views relative to
8 when this should go out or when it shouldn't, but it
9 was Staff's decision to put something out with what we
10 had and allow the vendors to opt to come to the
11 workshops, listen to the workshops, or whatever other
12 way they wanted to participate in their own means.

13 MR. WILSON: Ken Wilson again. I understand
14 the need to be timely with the whole process and to
15 move things along. And if there is some flexibility
16 both with the Staff and the third-party tester as far
17 as features and functions and the test plan itself
18 that there is not the ability to expand it greatly,
19 but some flexibility, I think that might accommodate
20 it, which actually leads to my other comment that
21 inevitably when you start testing, you run into
22 problems that you did not contemplate before you
23 started testing that were not initially in the master
24 plan or any detailed test plans. And I didn't see any
25 language that gave me comfort in the master plan as to

1 the ability to add, say, additional scenarios or some
2 limited number of additional tests if the testing
3 itself encounters issues which would necessitate
4 additional types of tests. Or if the CLECs in their
5 day-to-day business with U S WEST encounter some new
6 problems that need to be addressed in the way the OSSs
7 are working. So do you have any response to that?

8 MR. MOTYCKA: Yes, I do. And I cannot point
9 to any specific page in the RFP. I've talked to quite
10 a few of the vendors. And as with I believe all
11 vendors that have been contracted on the OSS, there
12 are amendments that were having to be needed to
13 fulfill the obligation of that vendor.

14 This situation is no different. There will
15 undoubtedly be additional changes that are going to be
16 made throughout the process. It's apparent to me,
17 probably apparent to most people involved in this
18 process, that changes are going to happen. Some may
19 be significant, some may not. There may be some
20 workloads that are taken away from the third-party
21 tester. There may be enhancements to create more
22 work. This Commission is not paying for this,
23 obviously. Otherwise, we'd have a much tighter RFP
24 than what is proposed. However, the party who is
25 going to be paid who is present today or is going to

1 be paying should be aware that there are
2 modifications, and the quotes and the prices are
3 subject to change, based on what's going to happen in
4 these workshops and going forward.

5 I think -- did you have another question? I
6 may have missed one.

7 MR. WILSON: I think you covered it in a
8 general way, which I think is appropriate.

9 MR. FINNEGAN: You had made reference to kind
10 of like an offer of ability of CLECs and U S WEST for
11 that matter to provide comments on the selection of
12 the third-party vendor. Is there a mechanism
13 available to distribute the responses to the proposal
14 that we could take advantage of to find out who's been
15 providing proposals?

16 MR. MOTYCKA: A mechanism to determine which
17 aspect?

18 MR. FINNEGAN: When the vendors provide their
19 proposal that says, here's what we're going to do,
20 here's how much it will cost. Those formal written
21 proposals, is there a mechanism to get those
22 distributed to the CLECs so they can refer to them in
23 our comments?

24 MR. MOTYCKA: I think we need to collectively
25 as a group discuss, is that what we want to do or do

1 we want to leave the Commission Staff and the
2 consultant independent from the CLECs and U S WEST
3 from participating? I'm flexible either way. I don't
4 want to bog down the process, and part of the intent
5 of getting this RFP out as quickly as we did is
6 because other states are starting to get on board
7 quickly on OSS. I want to be sure that we have the
8 best vendor out there with the most capable people.
9 There may be a company out there that is starting to
10 lose -- not lose, but utilize their personnel in other
11 states and they're not available to dedicate their
12 best resources here to Arizona. But I think as a
13 topic of discussion, I think it's something that we
14 need to talk about here and now relative to is this a
15 process that we want full involvement with or not.
16 And I can leave that discussion for the parties.

17 Mr. Crain.

18 MR. CRAIN: It's U S WEST's position that we
19 feel confident in the Staff and DCI in terms of
20 they're making a decision on this. We have some
21 feelings in terms of possible vendors, but what it
22 really comes down to is we just want somebody who's
23 experienced and has done this kind of work in the
24 past, and we feel that that kind of judgment can be
25 made by the Staff and the vendors without the parties'

1 input.

2 Whatever process is undertaken here, we agree
3 with the Staff that things must move very quickly. We
4 must move as quickly as possible to select a vendor.
5 So if there is a process for CLEC input, I think the
6 turnaround time has to be very quick. I don't think
7 anything's going to be a surprise here to any party,
8 so I would just emphasize the need for speed here.

9 MR. MOTYCKA: And may I reiterate something,
10 and I didn't mean to impress upon anyone -- if it is
11 the CLECs' desire or U S WEST's desire to get a copy
12 of the RFPs as they come in, I can see how that
13 process can work. If it is the CLECs' and U S WEST's
14 desire to submit written comments relative to the
15 proposals, I can certainly see that happening, as
16 well. What I was trying to do is exclude U S WEST and
17 the CLECs in the ultimate decision-making process that
18 says, ABC company and the company -- you can certainly
19 solicit your comments relative to the RFP.

20 MR. CRAIN: As an alternative proposal, we
21 could have all the parties submit along with their
22 submission -- I believe there may be a submission due
23 next Friday. Submit comments in terms of what the
24 criteria ought to be for selection of a vendor. I
25 don't think parties need to necessarily say this or

1 that about particular vendors, but maybe everybody
2 just weighs in in terms of what people think ought to
3 be considered when selecting a vendor.

4 MR. FINNEGAN: In terms of the process, AT&T
5 for one, I know MCI for another, have been through
6 some of these collaborative processes before, and we
7 think probably U S WEST has some insights they can
8 offer to the process to make the process better.
9 Certainly there's going to be situations where what we
10 think is better may be different than what U S WEST
11 thinks is better. And, of course, the ACC will be the
12 ultimate adjudicator of what goes on. But I think the
13 process is better served if we formalize a mechanism
14 for getting input from the interested parties. I'm
15 not trying to take away the ACC's ability to choose
16 the ultimate third-party or the ultimate pseudo-CLEC,
17 but I think if we can formalize -- and it doesn't have
18 to be a long process to do that. We can do this
19 quickly. But if we can formalize a way to provide
20 input into, Mr. Crain's point, both the selection
21 criteria and the selection, I think that would be
22 serving the ACC.

23 MR. MOTYCKA: And I appreciate those
24 comments. And what type of forum or what type of
25 vehicle would you see that happening in, similar to

1 what Mr. Crain suggested?

2 MR. FINNEGAN: No. 1, we've got the RFP, so
3 that's step one. We can take a look at that. And
4 then as the responses come in, have a mechanism to
5 have those distributed to the folks that want them.

6 I think Mr. Crain's comment, give the parties
7 an opportunity to provide comments on what some of the
8 selection criteria should be from a generic point of
9 view. And I also think that there should be a
10 mechanism to allow the interested parties to comment
11 on the relative pros and cons of the specific
12 proposals from the specific vendors. So you're really
13 looking at two vehicles: One is a generic document on
14 what the criteria for vendor selection should be; and
15 another is a document on the relative pros and cons of
16 the specific vendors' proposals.

17 MR. MOTYCKA: And what time frame did you see
18 both of those pieces?

19 MR. FINNEGAN: On a relative basis, the
20 criteria first, since that's independent upon receipt
21 of the specific proposals. I forget if you mentioned
22 when -- Thursday is the deadline for parties to get it
23 in?

24 MR. MOTYCKA: This Thursday at 5, yes.

25 MR. FINNEGAN: We could probably do one

1 document, given that it's coming Thursday. Maybe ten
2 days from Thursday.

3 MR. MOTYCKA: Ten days for what piece are you
4 referring to?

5 MR. FINNEGAN: For comments on the criteria
6 and comments on the pros and cons of the specific
7 proposals in one document.

8 MR. MOTYCKA: U S WEST, did you want to
9 respond?

10 MR. CRAIN: I guess I have a couple of
11 questions. We have not been able to obtain the
12 responses for two RFPs from other states, and I think
13 there's probably a good reason that people did that.
14 I'm not sure all the vendors want their bids and
15 submissions to be public documents and let other
16 competitors and other possible people that they might
17 do work for see the bids that they're submitting to do
18 the work.

19 In terms of the ten days, I think that's too
20 long. I think we ought to move as quickly as possible
21 here, and I think everyone can put together their
22 comments more quickly than that. I actually would
23 rather see a procedure where people give the general
24 criteria what the Staff ought to look for and then
25 have the Staff use their reasoned judgment to select a

1 vendor.

2 MS. BEAUPRE: MCI WorldCom certainly supports
3 participating in drafting and providing comments for
4 general criteria over a vendor selection. Obviously,
5 our biggest concern would be that this third-party be
6 a true independent third-party.

7 Secondly, the important factor of this Master
8 Test Plan would be that there be two vendors. I think
9 there was a solicitation for CLEC comments. And I
10 think that would be extremely important to have a
11 separate third-party consultant and a separate pseudo-
12 CLEC building to the specifications. I think there
13 would be a possible conflict of interest if the same
14 vendor was evaluating itself building upon
15 specifications and generating the test. I think it's
16 a lot more comprehensive test and then a lot more
17 objective having the two vendors participate in this
18 testing.

19 I also want to make one last point in
20 response to a statement Mr. Crain had said that he
21 recognizes this has all got to be done very quickly.
22 And while I understand that this testing should be
23 expeditious, I think we have to concentrate on what is
24 the objective of this test. Is it to be a
25 comprehensive test of U S WEST's OSS capabilities?

1 And I certainly wouldn't want to jeopardize the test
2 for some schedule. And I think that was another
3 comment that MCI WorldCom had made, and there were
4 proposed dates for this testing. And the Master Test
5 Plan has not even been completed, and we've got this
6 end date that we're trying to strive for. And I don't
7 know why these dates were generated, but I'm sure that
8 they're certainly not set in stone, and I would hope
9 that they would not be.

10 MR. FINNEGAN: In terms of the comments Mr.
11 Crain made about ten days being too long, ten days
12 from Thursday includes a couple of days on the weekend
13 and two days for two more of these workshops. I'm
14 just guessing, but I doubt in four or five or six
15 business days between now and ten days after Thursday
16 that Staff is going to be able to evaluate, digest,
17 and make recommendations on the selection of a
18 third-party test vendor. I think in that ten-day
19 period that evaluation is going to occur, and it gives
20 the Staff another data point, that data point being
21 the comments of the CLECs or U S WEST and any other
22 interested party to both criteria for selection and
23 the individual test plan. So I think ten days in
24 reality is quite reasonable and fits nicely into the
25 realities of the process Staff is going to use in that

1 selection.

2 MR. MOTYCKA: Let me make a couple comments.
3 The first comment, I just wanted to assure all
4 parties, there is no hidden agenda relative to getting
5 this thing done by October 1st or October 30th. I
6 think my philosophy and Staff's philosophy is take the
7 time you need, no more, no less. If we need
8 additional time, we are going to take the additional
9 time. Because we are trying to make this as much an
10 open process and a collaborative process, I will agree
11 that there should be some participation by all parties
12 to the degree that parties would be submitting written
13 comments; however, not involved with the interview
14 process and the final decision-making. That probably
15 needs to be as independent from U S WEST and the CLECs
16 as at all possible.

17 Relative to the submissions of the vendors,
18 we have requested the vendors to submit two formats,
19 one hard copy, one electronic copy. There are some
20 vendors here, if you folks would like to speak
21 relative to getting your submissions out in the
22 public. We have also viewed that submissions are in
23 the public. They're public documents. However,
24 within some of these submissions, there may be
25 confidential and proprietary information which would

1 not be released from Commission Staff. And as long as
2 that information is labeled confidential and it's
3 trade information they do not want released, we will
4 honor that. We can -- because they are going to be
5 electronically filed as well, it's very simple for us
6 to get these documents out immediately upon --
7 actually, Friday morning, close of business Thursday,
8 we have to open them, stamp them, and review them for
9 accuracy.

10 Without my direct counsel being here, I'd
11 have to validate that these are subject to public
12 scrutiny, public meaning the parties here in this
13 room. I don't want to overstep my bounds without
14 getting legal advice. Is there any vendor here that
15 would like to speak on that aspect?

16 MR. DRAGER: We intend to abide by the
17 Commission's expectations insofar as we can. So to
18 the extent you have afforded us the opportunity to
19 provide partially private information, we will
20 identify that. But largely, it will be public. We
21 also abided by the California PUC's rules, and they
22 are, in fact, entirely public so that it's a matter of
23 acquisition. And that's, of course, a process that
24 you've got to go through, and it takes time to do
25 that. But I believe the responses for California are

1 now available to anybody who wants them.

2 MR. MOTYCKA: Is there any other vendor that
3 would like to speak?

4 (No response.)

5 MR. MOTYCKA: Traditionally in the past this
6 Commission, if somebody would like to come in and see
7 one of the proposals, they could do that, review them
8 within the Commission. If they wanted to make copies,
9 they would have to pay for them. And that's what we
10 would normally do in this process. Trust me, I don't
11 get any of the money that you would pay for the
12 xeroxing. But through today's technology and because
13 there are advances and all documents that are filed
14 with us will be filed electronically, it would not be
15 difficult to do that and send them out shortly
16 thereafter.

17 I would need to take a few minutes to
18 consider the time interval that we would need to allow
19 all parties. So if you could do me that favor and
20 allow me a few minutes. Unless there's other
21 questions relative to the RFP, I'll turn it over to
22 Hagood, and he can talk about the task force.

23 MR. KOERNER: Bill Koerner with Hewlett
24 Packard. A couple of issues.

25 One, regarding the release, is we have

1 followed the procedures listed in the RFP response as
2 well, and we have identified several sections in our
3 RFP that we want to keep confidential for the reasons
4 discussed. Along with that, speaking of the
5 electronic copy we've submitted, those would need to
6 be gone through and portions removed since we have not
7 done that on the electronic copies.

8 The other point I want to bring up is if
9 there is a discussion to include another evaluation
10 process with input by the CLECs, etc., that that can,
11 in effect, make us go back and evaluate our whole
12 response and therefore may add more time to us being
13 able to put together a response.

14 MR. MOTYCKA: If I may ask a question of you,
15 were you saying that you may modify your proposal
16 based on what the individual parties might comment on?

17 MR. KOERNER: If there is a new sheet that
18 comes out that discusses the CLECs' criteria for
19 evaluating the responses, that may change some of the
20 way we've written the RFP response. Of course, not
21 knowing that ahead of time, I don't know. But I want
22 to make sure it's clear that we've written our
23 response based upon what we saw in the RFP. If any of
24 that criteria changes, it could change our response.

25 MR. MOTYCKA: Are there any other comments

1 for now?

2 (No response.)

3 MR. BELLINGER: Any other general comments
4 about the test plan?

5 (No response.)

6 MR. BELLINGER: Well, let's talk about the
7 advisory group. And I'd like comments from the CLECs
8 and other participants and U S WEST about how they
9 would like to see the advisory group work. We'd like
10 to see one that would be able to review the test
11 process as it goes along, and so I'd like your input
12 about how you would like to see that work, who you
13 think should be on the advisory group.

14 MS. BEAUPRE: I'd like to start this time.
15 MCI WorldCom certainly strongly supports an advisory
16 group or advisory board or whatever terminology you
17 want to select for it. And to that, MCI WorldCom
18 would like to indicate that it would like to see all
19 interested parties participate in this group. Any
20 CLECs who want to sit on it, U S WEST, Staff, and the
21 vendors.

22 But with that, I'd like to add a caveat to
23 the fact that certainly the function of this advisory
24 group is to develop a test plan, test scenarios, and I
25 would caution as to the extent of participation of U S

1 WEST with the understanding that there should be a
2 certain amount of blindness to this test. I think
3 there was a lot of problems in other state testing
4 where the ILEC had total visibility to the entire
5 testing, test cases, and I think that affected the
6 outcome of the objectivity of the testing.

7 So I think while I say, yes, all parties
8 should be part of this advisory group, including U S
9 WEST, that there may be some discussions that I feel
10 that U S WEST ought to be asked to exclude -- to be
11 excluded from those meetings when we get into the
12 details of the test plan.

13 MR. BELLINGER: Okay.

14 MR. CRAIN: I'm stretching to think of
15 discussions where we wouldn't be participating. Our
16 participation in determining what ought to be tested I
17 don't think in any way would affect the blindness of
18 the test. But I think we could get into those details
19 as we move on down the road. I just wanted to let you
20 know that U S WEST is quite skeptical that that's
21 going to be a problem.

22 I think we ought to look at how many people
23 ought to be on this advisory group. To the extent
24 that we need to move quickly and to the extent that
25 decisions need to be made, and inherently decisions

1 would need to be made quickly, I think that first of
2 all that the third-party vendor with the ACC ought to
3 be the deciding person or deciding vote on all issues
4 and that there isn't any kind of process in terms of
5 five people are there, you vote six to five and you
6 win -- or three to two, you win. But to the extent
7 that this group is set up to advise the third-party as
8 things move on, I don't have a problem with everybody
9 having input. I just think it's probably going to be
10 more workable if we have representatives of -- I think
11 California had three to five CLECs. I think Texas had
12 more. And did New York have less? I don't know. I
13 think the language proposed by AT&T about the
14 California TAG, although I haven't seen the exhibits
15 attached, but the general language there looks okay.
16 And I would suggest that we have the CLECs elect three
17 to five representatives to sit on the TAG. It may be
18 moot because there may be only three to five people
19 who want to do that.

20 MS. BEAUPRE: May I follow what you said with
21 a question.

22 MR. CRAIN: Sure.

23 MS. BEAUPRE: You said that there was a
24 limitation of three to five CLECs or three to five
25 representatives from each CLEC?

1 MR. CRAIN: No, three to five CLECs.

2 MR. BELLINGER: That was AT&T in their
3 comments I think recommended that.

4 MS. BEAUPRE: That's correct, in California,
5 three to five CLECs were the active participants who
6 would then go back and converse with all the other
7 CLECs.

8 MR. CRAIN: I understand there was an issue
9 raised about how many representatives from each CLEC
10 should be there. I say we move forward and see if
11 that's a problem in the future. But if people bring
12 30 people to each meeting, I think that could be a
13 problem. But I don't foresee that happening, and I
14 don't know why we need to limit any representation at
15 this point.

16 MS. GAMBLE: This is Yvonne Gamble with Cox.
17 And to this particular issue regarding the TAB or TAG
18 or task force, I just wanted to give a couple
19 comments. In California, that is correct, there are
20 five that will be in those -- basically five people
21 who actually step forward. But one of the caveats
22 that there will be is that there be five submittees.
23 So one submittee from each of the companies. That was
24 my comment.

25 MR. CRAIN: And I do think that each company

1 or each participating entity ought to have a
2 designated expert or representative spokesperson for
3 that company or entity so that if questions arise that
4 you go to that one person, but I don't see any point
5 to limit participation in meetings to just that one
6 person.

7 MR. FINNEGAN: A quick commercial for RUCO.
8 To the extent that they want to participate in this
9 process, I think we should allow them participation in
10 the group.

11 The other issue is, and this is twice in one
12 day, I'm going to have to agree with Mr. Crain again
13 that going in, we probably shouldn't limit the number
14 of CLECs involved, because I think it will turn out to
15 be self-limiting as it is.

16 MR. BELLINGER: I think what he was saying
17 was CLEC representatives.

18 MS. BEAUPRE: I believe U S WEST --

19 MR. CRAIN: That is what I was saying.
20 Although you're right, I think it may be self-limiting
21 and this may be an academic discussion. Maybe we
22 ought to ask folks to indicate before the next
23 workshop whether or not they want to participate in
24 the TAG, TAB, whatever we want to call it, and make
25 that decision and see if we even need to talk about

1 this.

2 MR. FINNEGAN: To follow up, in terms of what
3 the technical advisory group or technical advisory
4 board --

5 MR. BELLINGER: We need to figure out what to
6 call the group. Any votes for -- TAG has been used in
7 other places. I don't know if they want to do that.

8 MR. FINNEGAN: How about the omnipresent all-
9 knowing masters of the universe.

10 MR. CRAIN: I'm sorry, that's the Commission.

11 MR. STEESE: I'm assuming you want to be on
12 it, then.

13 MR. BELLINGER: I think I could work with
14 that group.

15 MR. CRAIN: I already work for those people.
16 I don't care what it's called.

17 MR. FINNEGAN: I like TAG.

18 MR. CRAIN: That seems to be the accepted
19 industry term.

20 MR. BELLINGER: Let's just go with TAG.

21 MS. LUBAMERSKY: You're it.

22 MR. BELLINGER: That's the official name for
23 awhile, anyway.

24 MS. BEAUPRE: As long as the acronym does not
25 associate us with Texas directly, that this TAG should

1 be in any way --

2 MR. BELLINGER: This is the technical
3 advisory group.

4 MR. CRAIN: I don't think it's going to be
5 referred to as the Texas advisory group.

6 MR. BELLINGER: Okay. I would like if you
7 could give me comments before the next workshop along
8 with some others, but this would be one, about whether
9 you would want to participate and how you feel about
10 participating, each CLEC.

11 MS. BEAUPRE: And would you be interested in
12 hearing how many participants from each CLEC company
13 would be anticipated?

14 MR. BELLINGER: I would say let's let that
15 rest for awhile in terms of -- see how many do show
16 up. And that would be another question, I think. I
17 don't know that we need to physically meet in terms of
18 how many times, but maybe conference calls a lot of
19 them. I think physically for certain meetings. So I
20 don't think it would be a requirement that you show up
21 here.

22 MR. CRAIN: U S WEST would recommend to the
23 extent that we're doing it in the winter, that we do
24 it in Arizona.

25 MS. BEAUPRE: MCI WorldCom supports that.

1 I think up until the point that we've got a
2 defined Master Test Plan and defined test cases and
3 scenarios, I think face-to-face meetings would be
4 recommended. I think there's going to be lots of
5 discussion to get to know the players, get to know the
6 issues, and I think the issues would be worked most
7 expeditiously if we were in the room rather than
8 trying to conference call. I've had experience in
9 other states. And once the major issues have been
10 resolved, it goes a lot more quickly. But it's going
11 to be just too intensive to try to resolve major
12 issues trying to wordsmith without visuals over a
13 conference call.

14 MR. BELLINGER: Okay.

15 MR. FINNEGAN: I think for the record, in
16 terms of the limitations, it's probably not -- more
17 important that there be no limitations. In Texas,
18 there were times where we were hamstrung on the amount
19 of people, severely limited. We were limited to only
20 one or two. We're not talking about bringing boat
21 loads of people. We're going to keep it reasonable.
22 We've got budget constraints like anybody else, but we
23 don't want to be limited to one or two people.

24 MS. BEAUPRE: And MCI certainly supports that
25 in that at times, MCI will be bringing forth many of

1 its subject matter experts in terms of the subject
2 matter. I think if we had agendas preceding each
3 meeting, then we could bring the appropriate subject
4 matter expert. But at various points in time, we have
5 other participants or one primary contact.

6 MS. GAMBLE: Yvonne Gamble with Cox. What I
7 would submit on those notes that MCI and AT&T are
8 bringing to the table, it does sometimes necessitate
9 that you have some other representatives, depending on
10 the subject matter. But what I would say is if it
11 comes down to a taking of a vote, if there are five
12 CLECs represented, there are five votes that be taken.

13 MR. CRAIN: I wouldn't anticipate any voting
14 process. I would think that if the TAG could come to
15 a resolution and agreement, that that would happen.
16 If it can't, that that decision be made by another
17 entity, be it the third-party or the ACC. To the
18 extent that they are able to create a dent with that
19 many people -- I really don't think this is going to
20 be a problem in the long run. If it does become a
21 problem, let's address it then.

22 MR. BELLINGER: I think that's a good
23 suggestion.

24 Okay.

25 MR. FINNEGAN: One other comment about the

1 roles. I see the TAG role as primarily two functions:

2 The one is getting the test planning started,
3 participating in the test plan, providing input and
4 guidance to either the third-party tester or the
5 parties that are developing the test plans.

6 Once the test plans are developed and test
7 planning or testing is being executed, there are going
8 to be unforeseen situations that come up and parties
9 go, geez, we didn't consider that. We've got to
10 attempt to come to some resolution of that issue
11 before we further proceed. That the TAG would be the
12 forum where some of these unforeseen circumstances can
13 be resolved, should they need resolution, and it be a
14 place for the tester, whether it's the pseudo-CLEC
15 third-party tester or some of the CLECs, can go to get
16 some of these unforeseen issues resolved.

17 And some earlier comments, if TAG is unable
18 through some consensus process to resolve an issue,
19 then it would be kicked up to the ACC itself for
20 resolution.

21 MR. BELLINGER: Okay. Any other comments
22 today on this?

23 (No response.)

24 MR. BELLINGER: We'll look forward to your
25 comments before the next workshop and maybe finalize

1 this group.

2 We had some time on the agenda, and I guess
3 there's some time you want to take on this vendor
4 selection part. I want to get into some discussion
5 about performance measurements today. But that would
6 be the main subject of the next workshop, but I
7 thought we could talk about it a little bit today.

8 And, in fact, in I think the September 16th
9 memorandum, you were asked to file written comments on
10 performance measurements and completed Appendix D by
11 September 24th for discussion at the third workshop.
12 So we'd like for you to do that, which the next
13 workshop will be held September the 30th.

14 I think that's going to be a rather difficult
15 process, and we'll I guess look at how that proceeds.
16 But I think the performance measurements will be
17 difficult, but hopefully we can come to some
18 resolution of those.

19 AT&T in its comments had quite a bit to say
20 about the performance measurements, general comments.
21 I'd like U S WEST to respond to those for the next
22 workshop. I don't know if you've seen those.

23 MR. CRAIN: We can do that.

24 MR. BELLINGER: Because they had some very
25 interesting comments, and I'd like to see a response

1 to those.

2 We've had a few comments about performance
3 measurements. Would anybody like to comment today on
4 performance measurements further or how they see that
5 process going? Rather than slugging it out in this
6 room, I guess everybody's holding theirs until next
7 week's workshop.

8 MS. GAMBLE: Are we meeting next week the
9 30th and the 1st or the 29th and 30th?

10 MR. BELLINGER: 30th and the 1st, I believe.

11 I think that is about as far as we can go
12 with the test plan at this point.

13 MR. MOTYCKA: Dave Motycka on behalf of
14 Staff. Let me go back to the RFP issue. The first
15 issue I want to address, I've concurred with legal
16 counsel. The submissions that are presented to us
17 from the various consultants and vendors, we will go
18 ahead and electronically distribute those to the
19 parties this coming Friday. We will endeavor to do
20 that as quickly as possible. All proprietary and
21 confidential information will be deleted as requested
22 by those individual vendors, and they will be housed
23 by Staff.

24 What I can agree to is this: That all
25 parties can submit selection criteria and general

1 comments to the RFP on or before September 29th, close
2 of business. What Staff is requesting parties not to
3 do is to criticize individual consultants and their
4 submissions but rather submit constructive comments on
5 criteria used to evaluate the proposals.

6 Additionally, any written responses to
7 today's meeting, responses that were filed last week
8 Friday, I think Mr. Bellinger alluded to U S WEST
9 responding to AT&T's comments. I would urge any
10 party --

11 MR. BELLINGER: And TAG comments, also.

12 MR. MOTYCKA: And TAG comments. I would urge
13 any party that has any comments that they would like
14 to comment on from another commentator to submit
15 those, also, by the 29th of September. Are there
16 questions on the RFP process?

17 MR. FINNEGAN: I've got a question or
18 actually a request. To the extent that information is
19 deleted, can it be made known that such and such
20 section was deleted so it's obvious that we know it's
21 gone?

22 MR. MOTYCKA: Yes, that can be done. And I
23 have to assume those parties have filled in the
24 sign-in sheet and put on their electronic address. If
25 you have not, you will need to let me know. We do

1 have copies of the sign-up sheets up there. If your
2 electronic address is not on there or you would like
3 it submitted to somebody else, please let me know.

4 MS. TRIBBY: Just one more clarification.
5 The portions that will be redacted, are those portions
6 that the vendors requested be kept confidential?

7 MR. MOTYCKA: That is correct.

8 MS. TRIBBY: Is that just pricing and numbers
9 or does it go beyond that?

10 MR. MOTYCKA: I have not seen any proposal.
11 Actually, they cannot be opened until close of
12 business Thursday, so I do not know. What we will be
13 doing -- because I don't know how many proposals the
14 Commission will be receiving. For those parties that
15 are submitting that have not been present at any of
16 the workshops, we will be contacting them to make sure
17 that nothing in their proposal is confidential before
18 we send it out. We should be able to identify that in
19 the hard copy, however, that is submitted to us. We
20 get hard copies as well as the electronic version.
21 But to avoid any type of mishap from occurring, I want
22 to make sure that what the vendors consider
23 proprietary and confidential is kept confidential with
24 the vendor and the Staff.

25 MR. HORODECK: Greg Horodeck from GE

1 Information Services. We'd like to have the right to
2 be able to submit two different electronic copies, one
3 for viewing by the ACC and one for distribution.

4 MR. MOTYCKA: That is perfectly fine. And if
5 you would identify and mark those as such so we don't
6 confuse them.

7 Any other comments on the RFP portion?

8 (No response.)

9 MR. MOTYCKA: As I said before, written
10 comments from -- all the written comments that we
11 discussed today, if you would like to comment on
12 those, please submit those, as well.

13 To verify, I may have mentioned that the next
14 workshop is the 29th and the 30th. I was wrong. It
15 is the 30th and the 1st. I apologize. I think I
16 created a little bit of confusion in this room, and I
17 apologize for that.

18 In addition -- I apologize a little for that.

19 In addition, the next workshop predominantly
20 we're going to focus on performance measures. Any
21 written comments relative to the RFP, I would ask
22 those parties that are going to file written comments
23 to bring additional copies to the next workshop so
24 that other parties are able to review those comments
25 as well and have them available to them at that

1 meeting. That would be for the 30th. So whichever
2 way you think is appropriate would be perfectly fine
3 with us.

4 I have no other comments for today. Are
5 there any parties that would like to make any closing
6 remarks or questions that they may have of U S WEST,
7 the CLECs or Staff or its consultants?

8 (No response.)

9 MR. MOTYCKA: Good answer. We'll go ahead
10 and close today's meeting. We'll see everyone on the
11 30th. Thank you.

12 (The workshop recessed at 4:05 p.m.)

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1 STATE OF ARIZONA)
) ss.
 2 COUNTY OF MARICOPA)

3 I, CAROLYN T. SULLIVAN, a notary public in
 4 and for the County of Maricopa, State of Arizona, do
 5 hereby certify that the foregoing printed pages
 6 constitute a full, true and accurate transcript of the
 7 proceedings had in the foregoing matter, all done to
 8 the best of my skill and ability.

9 WITNESS my hand and seal this 27th day of
 10 September, 1999.

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Carolyn T. Sullivan
 CAROLYN T. SULLIVAN
 Notary Public

My Commission Expires:
 June 6, 2003

