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1 **LEWIS**
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6 **BEFORE THE ARIZONA CORPORATION COMMISSION**

7 **WILLIAM A. MUNDELL**
8 **Chairman**

9 **JAMES M. IRVIN**
10 **Commissioner**

11 **MARC SPITZER**
12 **Commissioner**

Arizona Corporation Commission

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JAN 18 2002

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13)
14 **IN THE MATTER OF U S WEST**
15 **COMMUNICATIONS, INC.'S**
16 **COMPLIANCE WITH § 271 OF THE**
17 **TELECOMMUNICATIONS ACT OF**
18 **1996**

Docket No. T-00000A-97-0238

19 **COMMENTS OF WORLDCOM, INC ON REPORT**
20 **ADDRESSING QWEST'S STAND ALONE TEST ENVIRONMENT**

21 WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits the
22 following comments on the SATE Summary Evaluation Report for Qwest IMA-EDI
23 SATE ("SATE Report"), Version 3.0, release date of December 21, 2001, prepared by
24 Hewlett-Packard ("HP").
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1 WorldCom also reviewed the previous comments filed by AT&T on the SATE
2 Report and heard concerns raised by AT&T in the workshop and concurs in those
3 comments and AT&T's concerns about Qwest's Stand Alone Test Environment
4 ("SATE"), particularly those related to the assertion that HP's testing was incomplete,
5 because: 1) Qwest's SATE should be retested for IMA release 9.0; 2) other testing was
6 needed for error codes and edits from legacy systems; 3) the functionality of SATE is not
7 adequate; 4) post-order responses are provided only manually by telephone, and that
8 although "VICKI" would replace the manual process, VICKI needed to be tested; 5) no
9 flow through was available and, therefore, not tested; as well as 6) the general rate and
10 number of problems, including process support and documentation issues, found by HP,
11 need to be tested.¹ WorldCom also incorporates its earlier comments filed with respect to
12 Version 2.0 of the SATE Report issued December 3, 2001, as if fully stated here.

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16 **A. INTRODUCTION AND GENERAL COMMENTS**

17 The requirement for a stand-alone test environment to test Qwest's operation
18 support systems ("OSS") is found in the overall requirement that Qwest develop an
19 adequate change management plan ("CMP"). In evaluating Qwest's CMP, Qwest must
20 demonstrate *inter alia* the availability of a stable testing environment that mirrors
21 production.²

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25 ¹ See, Transcript from Workshop 5, OSS Final Report, dated December 12, 2001, at
26 Page 18, Line 4 through Page 20, Line 21.

² See, FCC 271 orders, TX Order ¶ 108; Mass. Order ¶ 103; PA Order, App. C, ¶ 42.

1 Qwest commissioned HP to evaluate its IMA-EDI SATE developed in August
2 2001.³ HP's primary objective was to provide an evaluation of Qwest's SATE that is
3 unbiased, factual and representative of the experience that a CLEC would face in using
4 SATE for interoperability testing.
5

6 Prior to issuing a new software release or upgrade, Qwest must provide a testing
7 environment that mirrors the production environment in order for competing carriers to
8 test the new release. If competing carriers are not given the opportunity to test new
9 releases in a stable environment prior to implementation, they may be unable to process
10 orders accurately and unable to provision new customer services without delays.⁴ KPMG
11 originally found Bell Atlantic's testing environment "Not Satisfied," specifically noting
12 that the testing environment "did not adequately mirror production capabilities."⁵ As the
13 New York Commission suggests, this can result in competing carriers' transactions
14 succeeding in the testing environment but failing in production."⁶
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17 Qwest's SATE does not use live production systems for test transactions. Instead, it
18 uses a front-end, IMA EDI that is purportedly identical to the corresponding production
19 interfaces, and a "stubbed" environment to simulate the back-end, legacy systems. Qwest's
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24 ³ See, Sections 1.1 and 2.0 of SATE Report.

25 ⁴ See generally, Department of Justice Evaluation at 35 ("testing is necessary to prevent
26 major service disruptions when Bell Atlantic makes changes in its side of the interface").

⁵ See, KPMG Final Report P1-2 at IV-17 (Test P1-2); New York Commission
Comments at Page 59.

⁶ See, New York Commission Comments at Page 59.

1 stated reason for using this approach is that it has not yet developed the means to ensure
2 that test transactions executed in interoperability will not impact live accounts. While
3 Qwest's concern may be reasonable since HP has experienced adverse impacts to live
4 accounts when using Qwest's Interoperability Testing process, because Qwest's SATE
5 does not use live production systems and a stubbed environment, the Commission must be
6 satisfied that Qwest's SATE adequately mirrors production capabilities.
7

8 As noted by HP, the SATE's simulation of back-end systems requires Qwest to
9 ensure the synchronization of SATE test results to make certain that CLECs receive
10 responses to transactions that are indeed the same responses that would be received from
11 production systems. This is particularly important if test transactions produce behavior that
12 is different than production systems, as the nature of the behavior cannot be anticipated
13 and planned for in advance. HP found that management of a test environment of this type
14 requires the involvement of knowledgeable personnel who can evaluate submitted orders
15 and ensure that the CLEC receives a response that mirrors production. It also requires
16 adequate resources and careful planning to ensure scalability. HP examined Qwest's
17 effectiveness in performing this responsibility through an assessment of the organization,
18 processes and resources, and through comparison to Production systems.
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22 In performing its analysis of Qwest's SATE, HP did not believe that all open issues
23 it found regarding the SATE had to be resolved prior to the conclusion of its SATE
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1 evaluation. Therefore, HP did not believe it was engaged to conduct a military-style test
2 of SATE, although apparently HP conducted some retesting.⁷ Rather, it believed it was to
3 perform an evaluation in a limited time frame of whether Qwest's SATE was adequate to
4 meet CLEC's testing needs in Arizona. HP found that while Qwest made improvements
5 to its SATE, the improvements were not major enhancements. HP did not test a new
6 release, specifically IMA release 9.0, and only tested releases 7.0 and 8.0. In addition, not
7 all scenarios described in releases 7.0 and 8.0 were tested. HP concluded that an exception
8 to its overall satisfactory rating of SATE was the absence of new release testing. Although
9 HP evaluated pre-release testing for IMA 8.01, HP found that evaluation was inconclusive
10 because HP was not able to fully verify that the SATE is adequate for new release testing.⁸

13 HP admitted it was unable to determine whether Qwest's SATE could
14 accommodate a new release. Nevertheless, HP found that, although Qwest's SATE was a
15 relatively new system that had not been subjected to a great deal of CLEC use, it offered
16 what HP described as "important benefits to CLECs in terms of certification and release
17 testing." HP concluded "given the current levels of CLEC usage" at the time it conducted
18 the test, Qwest's SATE was adequate. HP did provide nine recommendations to ensure
19 that Qwest's SATE evolves over time to meet CLEC testing requirements.⁹

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25 ⁷ See for example, Section 2.1.3 of SATE Report.

⁸ See, Section 2.1.6 of SATE Report.

⁹ See, Transcript from Workshop 5, OSS Final Report, dated December 12, 2001, at
26 Page 14, Line 8 through Page 16, Line 2.

1 HP acknowledged that only one CLEC was using Qwest's SATE in Arizona and
2 that it did no scalability testing.¹⁰ HP did not know how many transactions had been
3 submitted by that CLEC.¹¹ While Qwest stated that an additional CLEC had begun using
4 its SATE and that it was in discussion with five more CLECs about using SATE,¹² there is
5 no evidence that HP determined any other level of usage other than what the one CLEC it
6 referred to was providing. HP found noteworthy discrepancies related to business rule
7 consistency between the SATE and production systems currently used by CLECs in
8 Arizona and will be submitted in the State of Arizona.¹³

11 HP identified problems associated with documentation, test account data, and the
12 overall SATE testing process. HP believes that these problems were the result of the
13 SATE's newness and the small amount of use prior to HP's evaluation. HP asserts that
14 Qwest is using its CMP to allow formal tracking of issues and their resolution.

16 HP found that Qwest's SATE documentation is generally adequate, but that much
17 of the SATE documentation reviewed was newly developed and required support from
18 Qwest SATE personnel to allow HP to properly use the SATE environment. In addition,
19 the SATE documentation contained numerous inaccuracies that HP believes are the result
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23 ¹⁰ See, Transcript from Workshop 5, OSS Final Report, dated December 12, 2001, at
24 Page 25, at Lines 16 and 17.

24 ¹¹ See, Transcript from Workshop 5, OSS Final Report, dated December 12, 2001, at
25 Page 25, Line 22 through Page 26, Line 5.

25 ¹² See, Transcript from Workshop 5, OSS Final Report, dated December 12, 2001, at
26 Page 28, Lines 19 through 23.

26 ¹³ See, Sections 2.1 and 2.1.5 of SATE Report.

1 of hasty preparation and poor version control. HP found that Qwest had made
2 improvements to its documentation during the course of HP's review.¹⁴

3
4 HP evaluated the processes related to Qwest's IMA-EDI SATE access and used by
5 CLECs as described in the IMA EDI Implementation Guide. The purpose of the evaluation
6 was to assess the IMA-EDI SATE processes that a CLEC must follow to establish and test
7 its EDI connection and assess the extent to which these processes facilitate a CLEC's use
8 of SATE for transaction testing. However, completion of those processes was based
9 heavily on the interaction of Qwest and CLEC test team members rather than on the
10 process documentation itself.¹⁵ HP was unable to fully evaluate technical support due to
11 the lack of a standard set of technical support guidelines or procedures within the reviewed
12 SATE documentation. In addition, process performance was not measured against clearly
13 established process objectives for time, cost or quality. With the exception of transaction
14 testing, there was no evidence of clearly defined process measurements or objectives.
15
16 Finally, HP did not evaluate submission of requests through CMP because such an
17 evaluation was out of the scope of the evaluation Qwest commissioned HP to do.¹⁶
18
19 Nevertheless, HP found that the Qwest IMA-EDI SATE Process is not documented to a
20 degree of detail and clarity to reasonably support: 1) Ease of understanding by CLECs;
21 and 2) Consistent repeatability.¹⁷
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25 ¹⁴ See, Section 2.1.1 of SATE Report.

¹⁵ See, Section 5.2 of SATE Report.

¹⁶ See, Section 5.3 of SATE Report.

¹⁷ See, Section 5.4 of SATE Report.

1 HP found that SATE processes should be formalized and refined to provide an ease
2 of understanding by CLECs and to ensure consistent repeatability.¹⁸ HP found that 100%
3 of SATE Release 7.0 and 8.0 transactions have either passed the initial test or the re-test,
4 except for SATE Release 7.0 Regression Testing and SATE Positive Production Mirror
5 Testing.¹⁹

7 HP found that during initial design of the SATE, Qwest's use of CLEC input was
8 informal. HP believes that Qwest will need to take proactive steps to ensure that the SATE
9 remains adequate to meet the needs of Arizona CLECs and meets future CLEC testing
10 requirements.²⁰

12 HP developed nine recommendations aimed at ensuring that the SATE is
13 adequately robust to provide consistency between the SATE and production systems,
14 particularly with respect to business processes. HP believes that these recommendations, if
15 adhered to, will ensure that Qwest provides an environment that supports certification and
16 new release testing to serve Arizona CLECs' needs on an ongoing basis. These
17 recommendations are found in Section 2.2 of the SATE Report. Qwest responded to HP's
18 recommendations on or about December 28, 2001 (reformatted on January 3, 2001).

21 HP recommends that:

- 22 1. Qwest submit a plan to ensure that it meets CLEC needs for testing of all
23 products available in Arizona, including new technologies.

25 ¹⁸ See, Section 2.1.2 of SATE Report.

26 ¹⁹ See, Section 2.1.3 of SATE Report.

²⁰ See, Section 2.1.4 of SATE Report.

1 2. Qwest implement a quality assurance process and a release management
2 practice specifically for the SATE documentation. At a minimum, this
3 should specifically address the Data Documents and the Production Errors
4 Lists.

5
6 3. To ensure continued adequacy of the SATE, HP recommends:

7 a. That Qwest clearly and specifically identify the roles and
8 responsibilities of each individual and organization involved in the
9 SATE. This definition of roles and responsibilities should include
10 goals and objectives and mission statements for each organization and
11 for all personnel. In addition, the job description for each employee
12 should be clearly defined.

13
14 b. That Qwest develop a system of internal controls to ensure
15 accountability for organizations and individuals involved in the SATE
16 process. These controls should use clearly defined goals and
17 objectives and should tie specifically to functional responsibility, such
18 as quality of documentation, accuracy of test account data, mirror
19 image of production, etc. Employees involved in the SATE should be
20 encouraged to accomplish these goals and objectives.

21 c. That Qwest develop process flow documentation that
22 accurately reflects actual SATE processes and is a reliable guide to
23 CLECs using the SATE.
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- 1 4. Qwest publish a list of variances between SATE and production business
2 edits to ensure that CLECs are fully aware of any such discrepancies so that
3 a CLEC may effectively develop their business processes in this 'simulated'
4 environment. This list should be concentrated into a single document, and
5 become a permanent part of the SATE documentation library.
- 7 5. Qwest formally incorporate the SATE into the CMP process, and future
8 changes and modifications should be subject to that process and that Qwest
9 develop a permanent, formalized method of obtaining CLEC input and
10 identifying current and future SATE requirements in connection with the
11 CMP process. This process should proactively seek CLEC evaluation of the
12 SATE process, suggestions for improvement, and forecasts for testing
13 requirements. HP also recommends that Qwest obtain input from the
14 CLECS to determine the full suite of products that shall be included in the
15 SATE.
- 18 6. Qwest develop a formal process by which the SATE will be available for
19 new release testing on an ongoing basis.
- 21 7. To ensure that the SATE is adequate for full release testing, HP recommends
22 that IMA SATE release 9.0 be tested. This release is expected to take place
23 in February 2002.
- 24 8. A SATE performance standard be developed for Arizona that addresses the
25 need for Qwest to demonstrate that the SATE remains an adequate mirror
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1 image of production as OSS systems evolve. In reviewing this standard, the
2 ACC may wish to consider the nature and volume of transactions that are
3 executed in production. HP did submit a recommendation for PO-19 to the
4 TAG for consideration on 12/18/2001.

- 5
6 9. Qwest file with the ACC an implementation plan for the above
7 recommendations, which includes specific deliverables, milestones, and
8 dates, no later than December 31, 2001.
9

10 In its response to HP's recommendations Qwest asserted it had met some of HP's
11 recommendations,²¹ was using its CMP to address some recommendations,²² and
12 disagreed with HP's recommendation that IMA release 9.0 be tested.²³ HP has not
13 commented upon Qwest's responses to its recommendations. However, Qwest's refusal to
14 agree to the testing IMA release 9.0, is a fundamental issue for HP. Clearly HP did not
15 test IMA release 9.0, and its efforts to test IMA release 8.01 was deemed inconclusive for
16 purposes of new release testing. Accordingly, Qwest's refusal to agree to full release
17 testing as proposed by HP should in and of itself prevent Qwest from meeting the FCC
18 requirement that the SATE mirror the production environment. Absent such a test, it
19 cannot be said Qwest has met this critical FCC requirement.
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25 ²¹ See, Qwest responses to Recommendations 1, 2, 3, 4, 5, 6, 8 and 9.

26 ²² See, Qwest responses to Recommendations 1 and 5.

²³ See, Qwest response to Recommendations 7.

1 **B. SPECIFIC COMMENTS AND ISSUES**

2 1. The SATE evaluation was not intended to execute as a true "CLEC
3 Experience." This SATE evaluation was not intended to execute as a true "CLEC
4 Experience." There were parts of the evaluation that provided an assurance that
5 transaction data could be executed to provide expected outcomes; however, there were
6 processes that were expedited due to the necessity for HP to adhere to a static completion
7 date for the delivery of this evaluation. These included the addition of a new product to
8 SATE and the addition of new account data to SATE.²⁴

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11 As HP performed the transaction test evaluation, there were continual changes
12 made to the test bed scenarios and account data provided in the SATE. Due to these
13 changes, HP needed to ensure that any account data changes or scenario additions
14 continued to provide consistent results within SATE. Because of this, HP analyzed the
15 changes to the Data Document as each updated data document was published.²⁵ A
16 number of transactions contributed to a percentage of errors that indicates unfavorable
17 results. HP declared the errors that appeared overall were of minor to medium impact
18 when considering the overall capability of the SATE.²⁶

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21 Moreover, it appears that Qwest personnel were fully aware that this evaluation was
22 being conducted to determine whether Qwest complied with FCC mandates regarding its
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25 ²⁴ See, Section 6.4 of SATE Report.

26 ²⁵ *Id.*

²⁶ See, Section 6.5 of SATE Report.

1 SATE. "Public" weekly calls were held to review the status of the transaction testing
2 with all parties.²⁷ Thus, HP findings such as "Qwest's ability to efficiently update
3 documents to address HP's concerns suggests a level of resources that is sufficient to
4 support CLEC testing and SATE evolution"²⁸ and "...it shows the flexibility and
5 adequacy of resources necessary to deal with unexpected problems in the future"²⁹ cannot
6 be viewed as sufficient to ensure CLEC needs are met because HP was provided expedited
7 treatment when issues arose to meet "a static completion date."
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10 **2. There was no formal process to address deficiencies.** Deficiencies
11 identified during the evaluation were automatically rectified without formalized
12 processing of changes through the Qwest CMP. For example, HP requested the addition
13 of Unbundled Distribution Loop ("UDL") product to SATE and with the distribution of
14 Data Document v7.09 and v8.07 on November 28, 2001, Qwest added the UDL and
15 UDLNP products and their associated test scenarios.³⁰ There is no evidence that Qwest or
16 HP used the CMP to add UDL. However, Qwest's SATE process states "...additional
17 functionality can be agreed upon and added in later releases. Requests for transactions not
18 currently supported may be requested via CMP." At present, two CMP CRs are open
19 based on CLEC product requests: Line Splitting and Loop Splitting. When were these
20 CRs made and what is the soonest release when these products will be implemented? The
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25 ²⁷ See, Section 6.7 of SATE Report.

²⁸ See, Section 2.1.1 of SATE Report.

²⁹ See, Section 2.1.3 of SATE Report.

³⁰ See, Section 2.1.1 of SATE Report.

1 answers to these questions will provide a variance between what HP was provided and
2 what a “real” CLEC will experience.

3 **3. Military style testing philosophy is required by the MTP and TSD was**
4 **not adhered to.** The Arizona Master Test Plan (“MTP”), version 4.2, section 2.2.1 states:
5 “The Test Exception Process is a formal process, which includes retesting when
6 appropriate hereunder when an interface, system or process tested does not meet
7 established criteria, standards or expectations, in order to resolve the test exception.” The
8 Arizona Test Standards Document (“TSD”), appendix I, section 1.1 entitled “Scope”
9 states: “This appendix defines a process to identify and report an incident, which will be
10 issued when an interface, system or process tested or discovered by the Pseudo-CLEC or
11 Test Administrator (TA) does not meet objective criteria, standards or expectations.” The
12 Staff Recommendation on Checklist Item 2 issued December 24, 2001, section 25 states
13 “The MTP sets forth the approach, scope, focus, timeline, roles and responsibilities,
14 testing phases and all associated required activities for the testing of the CLEC access that
15 Qwest provides to its OSS. The MTP is the map for how the Arizona OSS tests were to be
16 conducted. The MTP listed Test Scenario level detail and other high-level requirements
17 describing how the tests would be conducted. The exact testing methodology for each test,
18 including both entrance and exit criteria, was set forth in the TSD. It provided detailed
19 Test Cases within the Scenarios, Scripts and other exact specifications as to how the tests
20 would be conducted.”
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1 As directed by the Arizona third party test governing documents, the MTP and
2 TSD, adherence to a military-style testing philosophy or test until expected results are
3 achieved must be performed. As such, neither the source of the evaluation, whether it was
4 commissioned by Qwest or the Commission, nor the entity conducting the evaluation, has
5 the authority to modify this requirement.
6

7 Moreover, Qwest's SATE is part of the CMP in accordance with FCC rulings and
8 as noted in the Introduction and General Comments section of these comments. CMP is
9 part of the Relationship Management Evaluation. Finally, in the Final Report of the Qwest
10 OSS Test, the following questions are asked and answered by Cap Gemini Ernst & Young:
11

12 (14) Does Qwest provide a development/change management test bed for
13 use by the CLECs to test new development or changes before they are
14 implemented? Does the test bed contain sufficient functionality and are
15 proper test bed operating procedures in place to allow CLECs sufficient
16 opportunity to implement changes in a timely fashion? Is the test bed
consistent with the capabilities and functionalities of the production
environment?³¹

17 The questions cited above clearly demonstrate that SATE is part of the Relationship
18 Management Evaluation that is a part of the MTP and TSD.³² Accordingly, Qwest's
19

20 ³¹ See, Final Report of the Qwest OSS Test, Version 1.0, dated December 21, 2001, Section 5,
21 Retail Management Evaluation, at Page 440 (Item 14).

22 ³² See, MTP, at page 2, where it states: "The Relationship Management Evaluation will provide
23 information that the ACC can use to determine whether the methods, procedures and
24 information which Qwest employs to communicate with the CLECs are effective. The
25 evaluation will examine: 1) the CLEC Account Establishment Process, 2) the CLEC Account
26 Management Processes, 3) the CLEC Training Process, 4) the Interface Development Process,
and 5) the Qwest Co-provider Industry Change Management Process." (Emphasis supplied).
See also, WorldCom's Brief addressing Interim Relationship Management Report dated
November 6, 2001, and Final Report of the Qwest OSS Test, Version 1.0, dated December 21,
2001, Section 5, Retail Management Evaluation, at Pages 393, 398-401, and 440 (Item 14).

1 SATE is subject to military-style testing under the general MTP and the TSD requirements
2 for retesting quoted above.

3 The following issues identified by HP need further evaluation to determine whether
4 Qwest's SATE meets the expected needs of the CLECs and the requirements imposed by
5 the FCC:
6

7 Regarding HP's Documentation Results. Issues identified by HP as
8 UNSATISFACTORY ("rating is assessed which defines that the documentation does not
9 meet the criteria specified") or UNSATISFACTORY WITH NOTE REFERENCE
10 ("rating is assessed with explanatory notes to assist in further clarification of the
11 unsatisfactory assessment when the documentation does not meet the criteria specified")
12 would need to be resolved to a level of satisfactory.
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15 Regarding HP's Transaction Test Results. Issues identified as
16 UNSATISFACTORY ("this criteria has not been met as shown by the transaction test
17 results outcome per the requirements of the confirmation"), INCONCLUSIVE ("a
18 conclusion cannot be derived with the current transaction test results further testing and
19 evaluation is necessary") or NOT AVAILABLE ("this test result is not available as the
20 transaction test is in progress at the present time") must be evaluated until a satisfactory
21 conclusion can be drawn.
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23 Regarding HP's Issues. Issues identified as CLOSED – UNRESOLVED ("an
24 issue that has been resolved verified and closed but unresolved. If there were open
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1 questions or comments against closing the issue, and HP was not able to come to
2 agreement before the end of the evaluation, HP changed the status of the Issue in the
3 Issues tracking system to closed – unresolved”) should be evaluated until HP can reflect
4 either a CLOSED and/or RESOLVED and VERIFIED status (“an issue has been
5 corrected according to Qwest’s corrective action plan...and verified by HP”).

7 Any issues identified as OPEN (no definition supplied – see issue
8 HPSATEEV2006) must continue to be evaluated until satisfactory resolution has been
9 achieved.

11 **4. There was no formal process for CLEC input prior to implementation.**

12 HP evaluated the extent to which Qwest solicited CLEC input on the IMA EDI SATE
13 functional specifications and design requirements, and the extent that this input was used
14 in Qwest's development of the SATE. Additionally, the CLEC Input Evaluation assessed
15 the manner in which Qwest solicited the input.³³ HP discovered that prior to
16 implementation Qwest had no formalized means of addressing CLEC concerns.
17 WorldCom was only requested to attend formalized SATE users group sessions beginning
18 in early November 2001. Qwest chose not to formally solicit CLEC input prior to
19 implementation of its SATE. HP further states that “after reviewing the SATE related
20 documents provided by Qwest, it was observed that no formal structure existed to obtain
21 input from CLECs during the initial design of SATE.”³⁴

25 ³³ See, Section 3.1 of SATE Report.

26 ³⁴ See, Section 3.5.3 of SATE Report.

1 Qwest's records of input received from CLECs in response to its solicitation for
2 input on SATE prior to the SATE Enhancement kick-off meeting on November 6, 2001,
3 were not available to be used for the evaluation. Qwest provided HP with a compilation of
4 documents surrounding its solicitation of input, but did not provide copies of inputs
5 provided by CLECs to Qwest.³⁵

7 Based on the Questionnaire responses and information obtained in the interviews,
8 Qwest did not initially solicit and act upon CLEC input related to SATE in a manner that
9 was adequately structured and thorough. However, based on observation during the
10 evaluation process, HP believes that Qwest has made improvements in their CLEC Input
11 Process, and its responsiveness to the input. Ongoing adherence to the recommendations
12 presented in the Evaluation section of this report will ensure Qwest maintains a
13 satisfactory rating in obtaining and utilizing CLEC input on SATE implementation and
14 testing.³⁶

17 Also worth noting is the history of the following change request ("CR") formally
18 submitted by Eschelon Telecom, Inc. Eschelon CR#4868276 entitled "Enhance Testing
19 Environment" for IMA EDI was submitted on June 29, 2000. Eschelon requested the
20 following: 1) Allow for more than one IP for testing purposes; 2) Move away from
21 scheduling testing time periods for pre-ordering, allow CLECs to test pre-order scenarios
22 during business hours; and 3) Provide test data or test decks for interoperability and
23

25 _____
26 ³⁵ See, Section 3.3 of SATE Report.

³⁶ See, at Section 3.4 of SATE Report.

1 certification test scenarios. Create scenario library. Qwest originally provided in the
2 CICMP meeting held August 16, 2000 a “T-shirt Size” (A term denoting the Level of
3 Effort to implement a CR) of “TBD” (To Be Determined), stating “*Qwest is currently in*
4 *the process of creating an end-to-end test environment. Qwest will revisit this issue when*
5 *that environment is available.*” Qwest later provided in the CICMP meeting held October
6 18, 2000 a T-shirt Size of “NA”, stating “*After further investigation of the Qwest end-to-*
7 *end environment, it has been determined that this environment will not be suitable for IMA*
8 *EDI interoperability testing because it does not contain all Qwest systems. The current*
9 *interoperability testing is the most robust environment available.*”

12 According to WorldCom’s records, the most current status on this CR was dated
13 March 1, 2001, and states “status changed to reviewed – release baseline candidate. The
14 release has not been determined.” When SATE was released in IMA 8.0 in August of
15 2001, Eschelon’s CR should have been identified as the source, yet in Qwest’s CICMP
16 meeting materials dated June 20, 2001, in Attachment E that identified release candidates
17 and descriptions, for “Project Name: Stand alone test environment”, Qwest made no
18 reference to Eschelon’s CR # 4868276.

21 5. HP was unable to fully test New Release Testing availability. WorldCom
22 wholeheartedly agrees with HP’s recommendation 7 that states “to ensure that the SATE is
23 adequate for full release testing, HP recommends that 9.0 be tested.” This release is
24 expected to take place February 2002. The FCC places emphasis on the need to make
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1 available a test environment prior to new releases.³⁷ In its New York BA/NY 271
2 decision, the FCC stated that “Bell Atlantic’s change management process provides for a
3 stable testing environment.³⁸ Competing carriers need access to a stable testing
4 environment to certify that their OSS will be capable of interacting smoothly and
5 effectively with Bell Atlantic’s OSS, as modified. In addition, prior to issuing a new
6 software release or upgrade, the BOC must provide a testing environment that mirrors the
7 production environment in order for competing carriers to test the new release. If
8 competing carriers are not given the opportunity to test new releases in a stable
9 environment prior to implementation, they may be unable to process orders accurately and
10 unable to provision new customer services without delays.”³⁹

13 KPMG originally found Bell Atlantic’s testing environment “Not Satisfied,”
14 specifically noting that the testing environment “did not adequately mirror production
15 capabilities.”⁴⁰ As the New York Commission suggests, this can result in competing
16 carriers’ transactions succeeding in the testing environment but failing in production.⁴¹

20 ³⁷ See, Memorandum Opinion and Order, CC Docket 99-295, *Application by Bell*
21 *Atlantic New York for Authorization Under Section 271 of the Communications Act To*
22 *Provide In-Region, InterLATA Service in the State of New York*, Section 109.

22 ³⁸ A stable testing environment means that no changes by the BOC are permitted after
23 the testing period commences. See generally U S WEST Sept. 27 Letter; NY Attorney
24 General Comments at 17 (describing the importance of testing opportunities for competing
25 carriers).

24 ³⁹ See generally, Department of Justice Evaluation at 35 (“testing is necessary to
25 prevent major service disruptions when Bell Atlantic makes changes in its side of the
26 interface”).

25 ⁴⁰ KPMG Final Report P1-2 at IV-17 (Test P1-2); New York Commission Comments
26 at 59.

26 ⁴¹ New York Commission Comments at 59.

1 6. Post order transactions are manual until the 9.0 release is implemented.

2 Qwest is in the process of implementing VICKI (Virtual Interconnect Center Knowledge
3 Initiator) that is intended to automate the current manually processed post order EDI
4 SATE transactions. Implementation is expected with IMA release 9.0 due out in February
5 of 2002. VICKI should be evaluated, since manual processes increase the level of errors
6 and most likely would increase the timing of responses. It is more critical to evaluate
7 VICKI given Qwest's slide presentation to the CLEC community dated September 14,
8 2001, entitled "Considerations" wherein it was stated:
9

- 10
- 11 1) Goal is to provide a superior test bed
 - 12 2) Time must be placed between transactions to allow for processing and
13 issuing of Supplementals
 - 14 3) Service Order creation is highly complex – In Interop and SATE,
15 service order detail does not exactly match production
 - 16 4) Manual rejects, non-fatals, and jeopardizes cannot be immediately
17 automated.
18

19

20 7. HP had insufficient evidence to ascertain the current of usage. As noted
21 earlier, this conclusion was based on a single CLEC who was attempting to use SATE in
22 the State of Arizona. The experience of one CLEC with little understanding of the nature
23 of the transaction submitted by that CLEC is insufficient to find that Qwest's SATE is
24 adequate. Moreover, the fact that HP conducted no scalability tests does not given the
25

26

1 Commission any evidence to demonstrate that Qwest's SATE will mirror the production
2 environment.

3 **8. Qwest's SATE does not provide a stable testing environment.** Given the
4 numerous changes SATE has undergone simply during this HP evaluation, CLECs cannot
5 expect a stable test environment. Until the above-stated critical issues are resolved to the
6 Commission's satisfaction, it is premature to make the determination that Qwest SATE
7 meets the needs of CLECs and the requirements imposed by the FCC.
8

9
10 The FCC⁴² found that "Bell Atlantic's change management process provides for a
11 stable testing environment."⁴³ Competing carriers need access to a stable testing
12 environment to certify that their OSS will be capable of interacting smoothly and
13 effectively with Bell Atlantic's OSS, as modified.
14

15 **9. SATE does not mirror the production environment.** The evidence
16 reflects discrepancies exist between SATE and production systems as noted throughout
17 HP's SATE report and these comments. HP found noteworthy discrepancies related to
18 business rules consistency between the SATE and production systems. Such discrepancies
19 may allow Qwest's SATE to appear adequate when in fact unexpected results occur when
20 attempting to perform similar transactions in the production environment. HP's
21

22
23 ⁴² See, Memorandum Opinion and Order, CC Docket 99-295 Application by Bell
24 Atlantic New York for Authorization Under Section 271 of the Communications Act To
Provide In-Region, InterLATA Service in the State of New York, Section 109

25 ⁴³ A stable testing environment means that no changes by the BOC are permitted after
26 the testing period commences. See generally U S WEST Sept. 27 Letter; NY Attorney
General Comments at 17 (describing the importance of testing opportunities for competing
carriers).

1 Recommendation 4 states “HP recommends that Qwest publish a list of variances between
2 SATE and production business edits to ensure that CLECs are fully aware of any such
3 discrepancies to that a CLEC may effectively develop their business processes in this
4 ‘simulated’ environment. This list should become a permanent part of the SATE
5 documentation library.” WorldCom agrees with HP’s recommendation and would support
6 any and all information necessary to understand the differences between SATE and the
7 Production environments supported by Qwest. The evidence produced reflects that
8 Qwest’s SATE does not mirror production.
9
10

11 **C. CONCLUSION**

12 There are many unresolved issues in HP’s SATE Report. Because “military style”
13 testing or a “test until pass” philosophy is being employed for OSS testing in Arizona, no
14 issue should go unresolved in spite of HP’s belief to the contrary. The critical nature of an
15 end-to-end test environment has been emphasized in the requirements imposed by the FCC
16 and sought by the CLEC community in Qwest’s territory. CLECs have not only sought to
17 have a sufficient end-to-end test environment but have also agreed to provide industry
18 input to assist in Qwest’s development of its SATE. Qwest has chosen to ignore CLEC
19 input or seek CLEC input. Accordingly, all outstanding issues must be resolved prior to
20 the completion of HP’s evaluation.
21
22

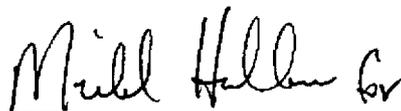
23 In addition, Qwest implemented its SATE without meaningful input from CLECs
24 and continues to change the test environment without using the formalized change
25
26

1 management process. Since a SATE is a critical element of the change management
2 process, CLEC input should be requested and welcomed.

3
4 Finally, Qwest provided its SATE late in process, unlike New York and Texas, both
5 of which had developed a SATE early on in the 271 approval and OSS testing processes.
6 Qwest should not be rewarded for its delay by having its SATE "passed on account of
7 age."⁴⁴

8
9 RESPECTFULLY submitted this 18th day of January, 2002.

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⁴⁴ See also, Exhibit AT&T 5-2, Lubamersky Letter and BA-NY order referenced in WorldCom SATE comments.

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