LEWIS AND ROCA LLP LAWYERS

BEFORE THE ARIZONA CORPORATION COMMISSION

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Chairman

JAMES M. IRVIN
Commissioner

MARC SPITZER
Commissioner

IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	**Docket No. T-00000A-97-0238**

WORLDCOM, INC'S COMMENTS ON FINAL REPORTS OF QWEST'S OSS TEST

WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits these comments and questions regarding the Final Reports of Qwest's OSS Test, including the Final Report of the Qwest OSS Test, Version 1.0, dated December 21, 2001, issued by Cap Gemini Ernst & Young ("CGE&Y") (hereafter referred to as the "CGE&Y Report"),

the Performance Measures Audit, Final Report, Version 3.0, dated December 21, 2001, issued by CGE&Y, (hereafter referred to as "PMA Report"), and the Final Report for 271 Test Generator, Final Release 2.0, dated December 21, 2001, issued by the Pseudo-CLEC (hereafter referred to as the " HP Report").

WorldCom incorporates by reference here its comments, questions, and briefs that have previously been filed on various dates in this docket with respect to issues addressed in the three final reports. WorldCom also concurs in the concerns raised by AT&T Communications of the Mountain States both in its written comments, questions and briefs as well as in its oral presentations made in the various workshops addressing the interim reports issued while testing the Operation Support Systems ("OSS") of Qwest Corporation ("Qwest").

Finally, contemporaneously with the filing of these comments, WorldCom filed its comments addressing Qwest's Stand Alone Test Environment ("SATE") and its brief addressing the Liberty Data Reconciliation Report. Those pleadings are also incorporated here as if fully stated.

1. Comments on Final Report of Qwest OSS Test.

As a general matter, the results of Arizona Third Party Test need to conclusively determine that CLECs are provided non-discriminatory access to Qwest's OSS and a meaningful opportunity to compete when using Qwest's OSS. While the report concludes that Qwest allows competitors a meaningful opportunity to compete repeatedly, there are little or no findings of fact to support the conclusions made by CGE&Y. Moreover, it is

not appropriate for CGE&Y to make the ultimate conclusion. Rather, CGE&Y should report the factual results, make factual findings, and leave to this Commission ("ACC") and the Federal Communications Commission ("FCC") the determination whether the competitors are provided a meaningful opportunity to compete, which is the ultimate conclusion of law.

CGE&Y is essentially acting as "tier of fact" when it conducts these tests and reports the results. As a result, its factual conclusions must be supported by sufficient and detailed findings of fact. For example, when the Staff of the Commission issues its checklist reports, it makes findings of fact and conclusions of law for each checklist item. Based upon those findings of fact and conclusions of law, Staff then makes recommendations to the Commission. CGE&Y should also be making equivalent "findings of fact" to support its factual conclusions in this report. The CGE&Y report should contain within it a complete statement of what facts CGE&Y relied upon to come to each of its ultimate factual conclusions. That is not to say the CGE&Y's factual conclusions are right or wrong, but without the a sufficient recitation of the underlying factual reasons which CGE&Y relied upon to come to its conclusions, neither the ACC nor the FCC can independently assess CGE&Y's factual conclusions without reviewing the underlying documentation the CGE&Y presumably relied upon in order to determine whether it believed that CLECs are provided a meaningful opportunity to compete.

a. Functionality Test.

The Master Test Plan ("MTP") states that the functionality test is designed to provide information to address the ability of Qwest's OSS to provide operational functionality to CLECs. The test includes a test of Qwest's processes including pre-ordering, ordering, provisioning, maintenance and repair, and billing. The test focused on resale, UNE-P, UNE-Loop, UNE Loop with LNP, and number portability. The purpose of functionality testing is to determine whether Qwest has developed sufficient electronic functions and manual interfaces to allow competing carriers equivalent access to all of the necessary OSS functions.

b. Capacity Test.

CGE&Y was directed to evaluate Qwest's OSS in the Capacity Test. The Arizona Technical Advisory Group ("TAG") established a capacity test plan.[1] The Capacity Test was designed to provide information which the Arizona Corporation Commission ("ACC") could use to assess the capability of Qwest's OSS to handle loads equal to or greater than those projected by the various competitive local exchange carrier ("CLEC") participants for estimated volumes projected one year from the date of the running of the Capacity Test. These volumes were to be determined by CGE&Y using projected volumes provided by both Qwest and the CLECs. The test also included a review of procedures associated with computer systems scalability and staff scalability to

[1]See, Section 6 of the Master Plan for Testing Qwest's Operations Support Systems in Arizona, Version 4.2, dated June 29, 2001, and Section 5 of the Cap Gemini Telecommunications 271 Test Standards, Version 2.9, dated June 29, 2001.

determine, under stated assumptions, whether Qwest's systems, operations and processes were predictably capable of handling CLEC loads in the future, both projected and unexpected[2] as required by the Federal Communications Commission ("FCC").

c. Relationship Management Test.

CGE&Y was directed to examine the process associated with the business relationships between Qwest and the CLEC community. Five business operations were to be addressed: CLEC Account Establishment, CLEC Account Management, EDI and IMA Interface Development and Qwest's OSS Co-Provider Change Management Process ("CMP").[3] In its final report addressing Checklist Item 2, the Staff of the Arizona Corporation Commission stated that [4], there must be "a demonstration by Qwest that it has an effective and workable Change Management Process ("CMP") in place." Qwest's CMP is in the midst redesigning the process as a means to create an industry standard process mutually negotiated with the CLEC Community in Qwest territory.

The CMP Status Report concerning the redesign process filed by Qwest on October 10, 2001, and WorldCom's response to that report dated October 23, 2001, and filed on or about October 25, 2001, provides some insight into the CMP redesign process at that time.

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[2]See, Executive Overview of the Master Plan for Testing Qwest's Operations Support Systems in Arizona, Version 4.2, dated June 29, 2001, description of Capacity Test.

[3] *See*, Sections 3.3.4, 7.1 and 7.2 of the Master Plan for Testing Qwest's Operations Support System in Arizona, Version 4.2, dated June 29, 2001, (hereinafter referred to as the "Master Test Plan") and Section 6.1 and 6.6 of the Cap Gemini Telecommunications 271 Test Standards, Version 2.9, dated June 29, 2001, (hereinafter referred to as the "Test Standards Document").

[4] *See*, Final Interim Report on Qwest's Compliance with Checklist Item No. 2, Access to Unbundled Network Elements, dated December 24, 2001, at paragraphs 4, 35

In addition, the second Status Report concerning the redesign process filed by Qwest on November 30, 2001, and WorldCom's response to that report dated December 7, 2001, reflects the most recent status of the redesign process.

d. Retail Parity Evaluation.

The purpose of the Retail Parity Evaluation ("RPE") was to determine whether a CLEC representative, using Qwest OSS interfaces, can provide a level of service and experience that is substantially the same in time and manner as that which a Qwest representative can provide using internal Qwest OSS interfaces. In accordance with the MTP, "The Retail Parity Evaluation test is designed to provide the ACC with information with which to directly evaluate parity of Qwest's OSS. This test is a comparison of the ability of a CLEC representative using one of Qwest's OSS interfaces to provide an overall comparable level of service and experience to the level of service and experience that a Qwest representative can provide using Qwest's standard internal OSS interfaces. The Retail Parity Evaluation test is designed to provide the ACC with information with which to directly evaluate parity of Qwest's OSS versus Qwest retail operations. This test provides for comparing OSS responsiveness as well as comparing the quality of the data accessed by the representatives. This test provides for comparing OSS responsiveness as well as comparing the quality of the data screens presented to the representative.

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through 38, and paragraphs 332 and 334 concerning Qwest's noncompliance with CMP requirements.

e. Performance Measurement Audit.

A Performance Measurement Audit was conducted by CGE&Y in an effort to validate the collection, calculation and publication processed employed by Qwest to generate Performance Indicator Definition ("PID") results. The audit results were published in a document not associated with the Final Report but is an aspect of the test that was required in the governing documents, the MTP and TSD.

In the Performance Measurement Test (aka "Data Reconciliation") section of the final report, CGE&Y used Qwest raw data ("adhoc") in an effort to recalculate the PID. The intent of the Performance Measurement Test was to validate Qwest PID results based on raw data generated by the Pseudo-CLEC because it was believed that the input data could be validated by CGE&Y by the tracking utilized during functionality testing. Thus, what is lacking in the final report is the evidence necessary to quantify the amount of Qwest raw data used by CGE&Y to account for data not collected by the Pseudo-CLEC.

2. Specific Comments – 16 Recommendations.

WorldCom will begin its specific comments by providing responses to the recommendations cited in CGE&Y Final Report "Executive Summary, section titled Recommendations". What is unclear with respect to these recommendations is the Definition of the priority associated ("high, medium, low"). Worth noting is that these recommendations are the result of CGE&Y findings during execution of the OSS tests and, as such, should require Qwest compliance prior to drawing any final conclusions

WorldCom comments on CGE&Y Recommendations based on OSS test results are as follows:

High	CGE&Y recommends that Qwest audit the PID structure and compare it to the proposed national standard. CGE&Y also recommends that annual audits be conducted on all measures based on a quarterly schedule to guarantee the continued accuracy of Qwest's Performance Measurement reporting. **WorldCom Comment: The PIDs were established with national standards taken into account but focusing on Qwest processes that enabled the means to determine non-discriminatory access. Thus, going forward, any changes to a metrics plan would continue to require state commission involvement so that critical elements are not overlooked. It is more critical to focus on mechanizing measures such that Regulators and CLECs can rely more heavily on the results. According to WorldCom records, based on a 1/22/01 "Manual Report" generated by Qwest, 55% of Qwest PIDs require some sort of manual processing (collection/calculate/load) in order to produce the results.**
High	Qwest should develop an automated process that would allow CLECs to view internal service orders generated by Qwest for CLEC owned accounts, whether the service order was initiated as a result of a service request from the CLEC, or by an internal Qwest activity. **WorldCom Comment: This recommendation stems from the fact that Qwest notification processes are inadequate. Notifications are critical for CLECs to understand the life cycle of their end users order such that appropriate customer service can be provided. CGE&Y recommendation only highlights the critical relationship between CLEC requests and internal Qwest activities that must be well maintained such that CLECs can properly support end user needs.**
High	Qwest should receive approval from a CLEC prior to performing any changes to a CLEC owned account. This would apply to any changes that are Qwest initiated. Currently, these activities are shown as "Completions" on a Loss and Completion Report, but little detail is provided, causing undue confusion. **WorldCom Comment: CLECs must have the ability to be in charge of their end users' accounts. Qwest ability to make changes to a CLEC owned account without approval is inappropriate and cannot be accepted. This recommendation was prompted by evidence that proved Qwest initiates changes without CLEC approval. Thus, until**

	such time that appropriate procedures are in place and can be validated by CGE&Y to eliminate such activity going forward, the only conclusion that could be made is that this type of activity is inappropriate and cannot be tolerated.
High	CGE&Y recommends that Qwest develop and publish clear standards that would enable CLECs to use the Firm Order Confirmations. These standards should clearly differentiate the Firm Order Confirmation, Jeopardy Notice, Reject notices, and all other notifiers **WorldCom Comments: Notifiers were established as the means to communicate to CLECs the life cycle of their orders. Each notifier must have proper rules ("standards") surrounding the means for the notification such that a CLEC can take necessary action, if necessary. CGE&Y recommendation suggests that proper standards are not in place such a CLEC can understand the life cycle of their customer's orders. This is a critical flaw that must be rectified.**
High	Qwest should expand edits of CLEC LSRs within the Business Process layer of the gateway systems prior to providing a Firm Order Confirmation in order to improve flow-through rates. WorldCom Comments: WorldCom agrees. Flow-through eligible restricts manual errors and improves CLEC ability to process greater volume of orders (efficiency). CLECs ability to process flow-through orders is restricted by the business rules that Qwest currently has in place.
High	Changes made by an Account Manager that affect a CLEC need to be updated internally and communicated to other internal departments or through the CMP consistently. WorldCom Comments: Qwest CMP is the means for both Qwest and CLECs to initiate changes to systems, product and processes. If Qwest is permitted to make changes that do not properly follow the established rules surrounding CMP, then CLECs are at a distinct disadvantage and

	the CMP is not complaint with FCC requirements. The rules surrounding CMP are currently being negotiated between Qwest and the CLECs but the fact remains that CMP is the forum for any and all CLEC-affecting changes that are going to be employed by Qwest. Thus it is critical that proper audit controls are in place that CGE&Y can validate such that instances that sparked this recommendation will be minimized going forward.
High	Add a facility availability query prior to the FOC edits to reduce facility jeopardy conditions. **WorldCom Comment: Qwest facilities cannot be reserved during the pre-order/order processes. When CLECs identify during pre-order that facilities exist, upon ordering Qwest employs a first- come, first-served policy when provisioning facilities. Not only does this particular scenario pose a problem but also the problem is compounded by the fact that Qwest systems will generate an FOC and it is not recognized that the facilities do not exist to fill the order until a technicians attempts to provision the requested facilities and a jeopardy notification must be executed. Thus, WorldCom wholeheartedly agrees that CLECs must be provided a better means to determine facility availability.**
High	Develop a process to perform a reconciliation of internal OSS databases (e.g., CRIS, LMOS, TIRKs, PREMIS, FACs) including switch and frame verification and audit to ensure accuracy of the inventory databases. **WorldCom Comment: CLEC orders are reliant on the accuracy of the databases employed by Qwest and the timeliness these databases are updated with CLEC order information. If Qwest does not have the proper audit control procedures in place to perform accurate and timely updates such that the databases are in sync, then CLECs problems range from confusing information to delays in order processing. As such, this is a critical issue that must be rectified.**

High	Improve the timeliness of record updates from Qwest's provisioning systems to the various downstream OSS in regard to customer conversions. **WorldCom Comments: Again this points to the ability of Qwest to process timely and accurate updates that would result in Qwest's OSS being in "sync" so that CLECs could rely on the information obtained or provided. This is a critical issue that must be rectified.**
High	Improve the timeliness of record updates from Qwest's provisioning systems to the various downstream OSS in regard to customer conversions. **WorldCom Comments: Again this points to the ability of Qwest to process timely and accurate updates that would result in Qwest OSS being in "sync" such that CLECs could rely on the information obtained or provided. This is a critical issue that must be rectified.**
Medium	Qwest should provide the CLEC with a complete listing of the services and features on any CLEC initiated order, as entered in Qwest's SOP. This recommendation should apply for any CLEC order type, whether flow through or non-flow through. This recap should include information such as USOCs, FIDs, Hunting Sequence, etc. **WorldCom Comment: WorldCom supports this recommendation as it calls for what the industry has recognized as a "fielded completion notice". The critical elements of this notification surrounds, but is not limited to, the need to have a fielded, parsed, completion notification showing the features provisioned for the customer by USOC, the customer's TN, the customer name, address, directory listing information, the completion date and the date on which the ILEC billing was suspended. The completion notification should be fully integrateable into the CLEC systems so that a CSR can be provided to other carriers as required.**
Medium	CGE&Y recommends that Qwest monitor the issuance of Service Order Completions to the CLECs. **WorldCom Comments: WorldCom questions the "medium" priority level associated with this recommendation given that a SOC is a key notifier CLEC's must rely on to know when orders have been**

	provisioned. It is WorldCom's impression that this recommendation is an effort to have Qwest employ audit control procedures that ensure timely and accurate SOC notifiers. This issue has always been an essential testing issue and it is definitely on that must be resolved.
Medium	CGE&Y recommends that Qwest publish EDI design documentation a minimum of three months prior to implementing a release. **WorldCom Comment: Design documentation allows CLECs the ability to build their side of an interface in accordance with Qwest published business rules. Timely design documents provide for the means to adequately build a CLEC's side of the interface but it is even more critical that accurate design documents are provided so that CLECs are implementing software that will not require changes prior to testing and production turn-up. Thus, WorldCom not only agrees with CGE&Y recommendation but would add a layer that requires accurate design documents be published in a timely manner.**
Low	CGE&Y recommends that Qwest publish standard intervals for Disconnects of all product types, across all markets. **WorldCom Comment: The absence of published standard intervals for Disconnects of all product types, across all markets is a hindrance to CLECs. Disconnects, as are orders, are processed by Qwest and CLECs and are reliant on the adequacy of that processing. If CLECs cannot be assured of a particular timeframe for disconnects then CLECs are at a distinct disadvantage and unable to provide quality customer service.**
Low	CGE&Y recommends that Qwest publish standard error-handling information and provide it to CLECs on the Wholesale website in a table format. **WorldCom Comment: Documented standard error-handling procedures would reduce CLEC errors, reduce manual handling required by Qwest and increase order efficiency. Given the benefits that would result from adherence to this recommendation, WorldCom wholeheartedly agrees.**
Low	CGE&Y recommends that Qwest improve the process for CLECs to

	reserve large blocks of Telephone Numbers. **WorldCom Comment: Such an improvement would provide greater efficiency when CLECs are in need of reserving large blocks of TNs for their end users. This scenario is most prevalent when businesses are looking to have associated TNs. Thus, WorldCom supports this recommendation and regardless of the priority assigned by CGE&Y sees this as a critical element to a CLEC's ability to efficiently process orders.**

3. **Functionality Test.**

a. Lack of Audit Controls and Validation

The tracking of functionality transaction history lacked appropriate audit controls by the Test Administrator. Valid mechanisms are necessary:

1. To understand the life cycle of orders (pre-order through billing),
2. To validate Qwest's actions taken per order are appropriate and timely,
3. To track troubles and validates resolutions,
4. To validate ordered services are properly billed in a timely manner, and
5. To ensure data reconciliation is based on concrete evidence obtained during testing.

As Test Administrator, CGE&Y was tasked with not only executing the required order number and types but also required to have the ability to track the history of each order so that life cycles would be understood from pre-order through billing. There is no evidence in the Functionality Report or the supporting documentation that validates such audit control procedures were employed by CGE&Y. Much evidence is provided that suggests valid audit control mechanisms were not employed by CGE&Y, which results in discrepancies that must be explained and documented.

For instance, as Section 7.3.1 of the Test Standards Document ("TSD"), Version 2.9 states "As a result of these Statistical Sub-committee meetings, the overall test sample quantity for the Arizona 271 Tests were established at approximately 1620-1890 Functionality test orders (for 12-14) flagged products/disaggregations", yet according to the Functionality Report, there were only 1567 order transactions issued. This discrepancy must be explained and documented by CEG&Y.

Further, it is not possible to reconcile conclusions reached based on CGE&Y's supporting documentation. That is why it has always been WorldCom's position that the Final Report should provide for the evidence necessary to understand how CGE&Y was able to draw their conclusions. Thus, the evidence must be provided in the Final Report such that all Parties can either draw similar conclusions as CGE&Y and/or their own conclusions but it would be based solely on the evidence on hand.

b. Pre-order to order integration was not tested for Qwest EDI interface

A most critical issues is the fact that no pre-order to order integration testing was performed for the Electronic Data Interchange ("EDI") interface. In the final report at Section 2.1.2 entitled "Scope" it is stated: "The pre-order test also included an evaluation of the integration quality of pre-order and order data" and "the integration quality of pre-order and order data for IMA-GUI was found to be satisfactory. Fields are cached and are pre-populated on the LSR, or selected from a drop down menu. The following exceptions were noted:

1. If a CFA was retrieved, it was not pre-populated on the Loop Service (LS) Form
2. NC/NCI codes are provided on the CSR query, but are not pre-populated on the LSR form

c. The integration quality of pre-order and order data for EDI was determined to be dependent upon the level of development of the CLEC EDI interface.

As an initial matter, there is no evidence in the final report to reflect how the IMA GUI "exceptions" noted above impact CLECs ability to process efficient orders. With respect to the EDI interface, MTP Section 4.1 entitled "Functionality Test Purpose" states: "The integration quality of pre-order and order data will also be evaluated during the functionality tests". As well, TSD Section 3.1 entitled "Scope" states "The integration of pre-order data supplied by Qwest and the order data required by Qwest will be tested" making no distinction between GUI and EDI.

Not only was pre-order to order integration testing called for in these governing documents but the FCC has consistently ruled that pre-order to order integration is essential for CLECs to be provided a meaningful opportunity to compete. For instance, in the BA/NY Order[5], paragraph 137 it states:

> Integration. We find that Bell Atlantic demonstrates that its application-to-application interfaces allow competing carriers to integrate pre-ordering information into Bell Atlantic's ordering interface and the carriers' back office systems, a finding that is fundamental to a BOC's showing of nondiscriminatory access to OSS. The Commission has explained previously that a BOC with integrated pre-ordering and ordering functions must provide competing carriers with access to the same capability. In this regard, the BOC must enable competing carriers to transfer pre-ordering information electronically to the BOC's ordering interface or to the carriers' own back office systems, which may require "parsing" pre-ordering information into identifiable fields. Without an integrated system, a competing carrier would be forced to re-enter pre-ordering information manually into an ordering interface, which leads to additional costs and delays, as well as a greater risk of error. This lack of integration would place competitors at a competitive disadvantage and significantly impact a carrier's ability to serve its customers in a timely and efficient manner.

The FCC also notes in its order on TX 271 application that:

> 410. . . .in order to demonstrate compliance with checklist item 2, the BOC must enable competing carriers to transfer pre-ordering information (such as a customer's address or existing features) electronically into the carrier's own back office systems and back into the BOC's ordering interface. We do not simply inquire whether it is possible to transfer information from pre-ordering to ordering interfaces - we assess whether the BOC enables *successful* integration.
>
> 411. We clarify that a BOC has enabled "successful integration" if competing carriers may, or have been able to, automatically populate information supplied by the BOC's pre-ordering systems onto an order form (the "local service request" or "LSR") that will not be rejected by the BOC's OSS systems.

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[5] *See*, In the Matter of Application of Bell Atlantic New York for authorization under Section 27i of the Communications Act to provide In-Region, InterLATA Service in the State of New York, CC Docket No. 99-295, Memorandum Opinion and Order, adopted December 21, 1999, at Paragraph 137.

The following is **significant** and thus worth noting: 1) Qwest IMA GUI interface does not support versioning because it is browser-based and, therefore upon signing on, CLECs are provided the most current version of the software. 2) Qwest IMA EDI interface on the other hand does support versioning because it is application-to-application based and thus is dependent on software development in order to obtain the latest release capabilities. Currently, Qwest IMA GUI supports version 8.01 that is purportedly based on LSOG 5 (2000) guidelines. In Arizona, the Pseudo-CLEC's EDI interface was built to Qwest version 6.0 that is purportedly based on LSOG 3 (1998) guidelines. Therefore, the level of integration that may be reflected in the IMA GUI interface could be significantly different that that of the IMA EDI simply based on the release software available to the Pseudo-CLEC at the time of testing.

The Pseudo-CLEC built its side of the EDI interface based on Qwest documented business rules, which may or may not prohibit desired integration. Since pre-order to order integration was not evaluated, the ACC has no independent evidence to support either direction. Lastly, with respect to pre-order and order integration, CGE&Y Appendix Q - LSOG 3 comparison provides the means to identify variances between Qwest business rules and LSOG 3 guidelines. It has been WorldCom's experience during the anticipated development of a flow through interface, the industry standards for pre-order cannot be implemented as defined due to field value differences between pre-order and order.

Therefore, a full evaluation of Qwest EDI interface must be performed to determine if pre-order to order integration is sufficient to allow competing carriers a meaningful opportunity to compete as required by both the MTP and TSD and FCC requirements.

d. Emerging Services were minimally reviewed and tested

Emerging Services are considered products unavailable at the time the MTP or TSD were written but that became available to CLECs during the course of this test. WorldCom jointly filed with AT&T and COX a formal request to have emerging services added to the test.[6] The inclusion of Sub-Loop, Dark Fiber, Enhanced Extended Loops ("EELs") , Shared Loop (Line Sharing), and Packet Switching was discussed by the TAG at the August 21, 2001 meeting. It was determined at that time that every effort would be made to solicit CLEC support as a means to test these services, but at a minimum CGE&Y would evaluate Qwest's methods and procedures for emerging services to ensure proper deployment of such services could be performed by CLECs.

1. EELs

Regarding EELs, CGE&Y notes on page 57 of the final report that four different Scenarios of EEL products were to be tested, yet the test results reflect 3 of the 4 scenarios were, in fact, were not tested. During re-test activities, of the three orders attempted, the Pseudo-CLEC was only able to execute and receive a FOC and SOC on a single order (EEL-P cited on page 59 of the final report). While there is minimal evidence concerning the actual ordering of EELs, CGE&Y states that the documented procedures as of

September 2001 "contains the information necessary to successfully submit an EEL LSR." CGE&Y provides no factual evidence to support this conclusion.

The Regional Oversight Committee ("ROC") test has observed the following issues with respect to EEL ordering and provisioning processes employed by Qwest: Observations 3054 and O3053 concerning "Inconsistencies exist in Qwest Enhanced Extended Loop (EEL) DS1 provisioning documentation" and "Qwest's OSSLOG Trouble History was missing the closeout codes for repairs completed to DS1 Services", respectively.

2. UDIT

Regarding Unbundled Dedicated Interoffice Transport ("UDIT"), CGE&Y performed a process analysis in order to draw the conclusion that "if a CLEC is experienced with the ASR process, Technical Publication 77389 and the UDIT PCAT provides the CLEC with sufficient information to successfully order a UDIT." WorldCom provided actual UDIT ordering information to CGE&Y as a means for auditing the UDIT practices employed by Qwest but there is no mention of their evaluation in the final report.

3. Sub-loop

Regarding Unbundled Sub-Loop, CGE&Y "finds that the Qwest wholesale website provides the necessary information to order Unbundled Sub Loops and Field Interconnection if the CLEC is experienced with the outside plant configurations, Technical Publication #77405, the Sub-Loop PCAT, and the field connection point PCAT.

[6] See, (email to CGE&Y dated August 10, 2001.

This conclusion was based on a process evaluation and not actual testing. CGE&Y emphasis on CLEC experience was not their charter to assess, what was required was an evaluation that would prove Qwest documented business practices support the ability for CLECs to process such orders.

4 Dark Fiber

Regarding Unbundled Dark Fiber (UDF), CGE&Y concludes "the UDF job aide, Technical Publication 77383 and the UDF PCAT provide the CLEC with the information necessary to order a UDF. In some cases the CLEC will have to go to sources listed in the above documents to obtain specific information. The PCAT refers the CLEC to the Systems General Information web site to obtain information on the Fiber Data Reports. Since access to this report is an important step in the process, it is important that it be included in the PCAT." WorldCom considers it critical to have a single source for obtaining vital ordering information.

5. Line Sharing

Regarding Line Sharing, CGE&Y concludes "that the Qwest wholesale web-site present the product and the various options, billing, maintenance and actual purpose of use in a clear manner. The web site also contains active links to the Account Teams that provide support for the particular products." What is lacking in this report is an understanding, factual evidence or examples of what CGE&Y meant by "clear manner".

6. Line Splitting

Regarding Line Splitting, "CGE&Y finds that the Qwest wholesale web site presents the product and the various options, billing, maintenance and actual purpose of use in a good, clearly stated manner. The web site is also supported with active links to the Account Teams that provide support for the particular products." What is lacking in this report is an understanding, factual evidence or examples of what CGE&Y means by "good, clearly stated manner".

e. IWOs issued and Qwest purported resolutions must be validated by CGE&Y

The Executive Summary in the Final Report, Section "Findings" Table states:

	OSS Improvements Initiated	System Tables	Training Updates	Procedure	Metrics	Documentation	TOTAL
Functionality	29	7	22	20	26	9	113
Retail Parity	0	0	2	4	0	8	14
Capacity	3	0	0	0	0	0	3
Relationship Management	17	0	7	7	0	14	45
N/A							47
TOTAL	49	7	31	31	26	31	222

As an initial matter, there is a discrepancy in the number of IWOs reflected in the above table (222) vs. IWO summary as of the January 3, 2002 report (347- Withdrawals = 314)

The final CGE&Y Report lacks a description of any validation steps CGE&Y took upon implementation of a proposed "fix", regardless of the type, to ensure the fixes address the original negative findings uncovered. If the military style (test until pass) philosophy has any meaning as described in the MTP and TSD then any and all proposed fixes must be validated to ensure CLECs are not further negatively impacted as CGE&Y originally determined. A promise or assertion that something has been fixed, is not sufficient and provides no independent verification that the fix corrected the original problem.

CGE&Y states that the change management plan ("CMP") forum is a positive step in the ability for CLECs to provide input to system enhancements. Qwest's CMP is currently undergoing a redesign of the process to more adequately meet the needs of CLECs.[7] Until such a process has been fully established, implemented, demonstrated to meet the needs of CLECs and found to be in compliance with the FCC's CMP requirements, it cannot be determined whether it resolves any of the issues, and CGE&Y's statement is mere hopeful speculation.

f. Maintenance & Repair testing inadequate to ensure CLEC ability to have issued and resolve trouble tickets

CGE&Y states "Approximately 72 percent of the M&R test cases were performed using CEMR because of the constant availability (via the Pseudo-CLEC) as compared with the EB-TA application." EB-TA was evaluated using WorldCom's established

[7] *See*, WorldCom's Response to Qwest Status Report filed in this docket on December 7, 2001, and Qwest's Status Report filed in this docket on or about November 30, 2001.

interface. WorldCom is largely concerned by the error rate generated when CGE&Y attempted to execute the 63 test cases via CEMR. The error rate totaled 11%. Not only was there a significant error rate but also CGE&Y performed no root cause analysis on these scenarios.

As the Final Report states, "the focus of the M&R evaluation was to:

- Determine whether these systems generated a timely and accurate trouble report
- Determine if the Pseudo-CLEC or participating CLEC could perform a Mechanized Loop Test (MLT) for a reported trouble
- Determine if the MLT results provided the Pseudo-CLEC or participating CLEC the appropriate information
- Determine whether the Pseudo-CLEC or participating CLEC could obtain the status of a trouble ticket
- Determine whether Qwest notified the Pseudo-CLEC or participating CLEC of successful restoration of service after the service fault was identified and corrected
- Determine whether the Pseudo-CLEC or participating CLEC could retrieve a customer's trouble history, as applicable

In accordance with the TSD, Section 3.7.6.6 Exit Criteria:

The Pseudo-CLEC and MCIW will have been able to perform the following functions:

a) Create trouble tickets via both CEMR and EB-TA

b) Request an MLT

c) Request and review trouble ticket status via the CEMR or EB-TA and document status/results on daily log

d) Receive/Request trouble ticket closure notification, including the disposition and cause codes

e) Receive emergency notification for network events (e.g., switch failures)

f) Execute and pass all Trouble/Maintenance test scripts

g) Successfully retrieve customer trouble histories

h) Achieve performance benchmarks and parity requirements in accordance with the Functionality portion of the plan

i) Access Qwest's switch and compare feature/functionality via the IMA-GUI, Maintenance and Repair, Feature Availability function and compare the switch data to the test account CSR

What is lacking in the Final Report is the evidence necessary to prove the above exit Criteria were met. Specifically, CGE&Y states in Section 2.2.3 entitled "Service Validation":

> The TSD anticipated accessing Qwest's switch and comparing feature/functionality via the IMA-GUI M&R Feature Availability function. As this method was not feasible due to a deficiency of technical resources to translate switch output, CGE&Y achieved service validation by having Friendlies use the features to test their operability.

Of particular concern to WorldCom is whether a CLEC may perform an MLT in a timely manner. Upon service order completion, a CLEC should have the ability to perform an MLT because CLECs are obligated by Qwest business rules to perform all testing available in an effort to isolate trouble. The MLT reported results could then be populated on the trouble ticket when issued.

WorldCom expects that until such evidence is provided that all required trouble reporting scenarios are executed and have met the TSD exit criterion, the military style testing philosophy will be adhered to.

g. Billing test incomplete and provides insufficient evidence to prove CLECs are not hampered by Qwest billing processes

Per page 94 of the Final Report, CGE&Y states "Although the MTP specified the creation of both Integrated Access Billing System ("IABS") and CRIS bills for validation

in this test, CGE&Y focused primarily on CRIS bills in the billing portion of the Functionality test." (emphasis supplied.) Product types billed from IABS are Collocation, Resale Frame Relay, Local Interconnection Service ("LIS"), Interconnect Port-Local Service, UDIT, DS1 Message Trunk Ports, and E911 (for facility-based CLECs only). These product types were not the central component of the Functionality Test." More accurately, there is no evidence or factual support in the Final Report that reflects any evaluation was made regarding IABS billing. Therefore, the billing test is incomplete.

CGE&Y evaluated Customer Record Information System ("CRIS") billing processes employed by Qwest. CRIS "provided daily usage files ("DUF") containing both PCLEC usage and access records." Regarding CRIS billing, one of the key areas of concern were the deficiencies identified by CGE&Y regarding the DUF records. As noted on page 104 of the Final Report, "approximately 100 discrepancies were discovered during the comparison of the DUF to the hard copy bills. These discrepancies included usage on the bills but not on the DUF, usage on the DUF but not on the bill, and listed on the friendly Call Detail Log but not on the DUF and/or bill." IWO 2120 was issued and closed. There is no factual support indicating what the actual corrective actions were made by Qwest. Not surprisingly, there are no factual statements describing the steps CGE&Y took to validate that those corrective actions resolved the issues originally identified.

Section 3.3 of the TSD entitled "Billing Interfaces" states: "The billing process is the means by which Qwest provides CLECs with wholesale bills, usage data and records

for the services, features, network elements (e.g., loop) and features that were ordered and provisioned. The primary focus for testing the billing interfaces is to validate the timeliness, accuracy and completeness of the Qwest billing processes". In order to perform a valid audit of timeliness, accuracy and completeness of the Qwest billing processes, the ability to track orders end to end is critical. As stated in above comments there is evidence that indicates tracking of orders from end to end, which also taints the test results.

h. CLEC/Qwest Interviews/Questionnaires

WorldCom is also concerned that when CGE&Y prepared questionnaires to CLECs, the questionnaires were too general in nature and not followed-up. The questionnaires frequently sought general and conclusory statements from CLECs regarding Qwest's CLEC Account Establishment/ Maintenance, CLEC Account Management, and CLEC Training. Moreover, CGE&Y acknowledged that it did not conduct follow-up interviews or send out additional questionnaires to CLECs upon receipt of the responses to the initial questionnaires to obtain more specific information.[8]

Sections 6.2.3.3, 6.3.2.3, 7.2.1, and 7.2.2 of the MTP required CGE&Y to conduct interviews with either CLECs or the Pseudo CLEC to document experiences (1) in setting up new accounts; (2) regarding responses to account inquiries, Help Desk call processing, Help Desk call closures, Help Desk status tracking, problem escalation, forecasting, and communications in general, and (3) regarding the timeliness, accuracy and completeness

[8] See, transcript dated October 9, 2001, at page 104, line 19 through page 105, line 11.

of Qwest responses to Account inquiries, the timeliness and responsiveness of Help Desk call processing, the appropriateness and methods applied to Help Desk call closures, the actual performance of Help Desk status tracking activities, the frequency and appropriateness of problem escalation efforts that are taken in response to CLEC inquiries, the reasonableness of forecasting requests and the extent to which forecast information is applied by Qwest into its various planning activities, and communications avenues that are available to CLECs by Qwest and the extent that these are effective.

As noted above, WorldCom concurs in the concerns raised at the workshop by AT&T regarding the interview, or lack of an interview, process with regard to CLECs and the pseudo-CLEC and CGE&Y's significant reliance on general questionnaires. On the other hand, CGE&Y appeared to conduct more detailed and follow-up interviews with Qwest personnel and then rely on those interviews, instead of reviewing any Qwest documentation or written methods and procedures necessary so that all Qwest employees know the course of actions required when addressing CLEC needs when conducting business with Qwest.

i. Evidence provided reflects inadequate procedures employed by Qwest to support critical notifiers necessary for CLECs to conduct business

As discussed in WorldCom's comments on the CGE&Y's 16 Recommendations, CLECs are dependent upon the notifications sent by Qwest to understand each independent life cycle of their orders. Critical notifications consist of "rejects",

"acknowledgements", "firm order confirmations (FOC)", "jeopardies", "service order completions (SOC)" and "billing confirmations".

Examples of problems with these types of critical notifiers are as follows:

1) As stated in the Final Report (pg. 75), "during testing it was determined that FOCs are used by Qwest for purposes other than confirming the order. When a CLEC receives a FOC, it expects a valid due date to be confirmed. If multiple FOCs are received changing the status of the order (i.e., due date change, jeopardy condition, reject message), a CLEC must manually interpret the impact of this status change on the order processing."

2) As stated in the Final Report (pg. 74), "CGE&Y encountered numerous instances when orders were completed, but Qwest did not provide a timely SOC. Of the 1,315 orders that received a SOC, 337 did not receive a SOC at the time of completion. Qwest has identified multiple causes, and has implemented system changes."

WorldCom cannot stress enough the critical nature of receiving timely and accurate notifications during each phase of an order's life cycle so that CLECs can rely on the information to provide quality customer service to its end users. What is lacking in the Final Report is sufficient evidence that Qwest addressed these issues, and that CGE&Y validated any proposed changes purportedly addressing the problems originally uncovered.

4. Capacity Test.

a. CGE&Y did not properly track Operational Readiness Test ("ORT") Results.

In the Arizona Capacity Test Workshop on the interim report, it was determined that CGE&Y did not track the results of the five ORTs performed in order to validate that all issues identified were resolved. Although many issues were identified as reported in section 4.1.3 of the final report (Incorrect test scripts created by CGE&Y; Incorrect templates created by the Pseudo-CLEC; Incorrect test bed setup by Qwest, and Inconsistent reporting of times), CGE&Y did not track these issues for each ORT. In accordance with the System Capacity Test Detail Plan, "The overall objective of the operational readiness test is to verify that all of the components of the System Capacity Test are in place and working in a sufficient manner to enable the test to proceed after evaluation of the results of the operational readiness test". Without tracking the results of these issues for each ORT, CGE&Y could not properly validate that any of these issues were, in fact, resolved.

CGE&Y failed to evaluate the results of the ORT to establish the performance results of executing the tests. The critical facts of pre-order transaction response time and the interval within which Qwest returned Firm Order Confirmations ("FOC") for the test orders were not evaluated. Such an evaluation would have enabled CGE&Y to compare the results of the ORT with the results of the system capacity test. A comparison would demonstrate consistency of results between the separate tests - a logical

application of test integrity. Instead CGE&Y did nothing. In response to a question posed by Mr. Connolly on behalf of AT&T at the workshop CGE&Y stated:

"What did you conclude to be the reasons that there are differences in the response time between the ORT and the Capacity Test?"

"We didn't conclude anything." [9]

AT&T Exhibits 3-7 and 3-8 show that the Pseudo-CLEC enjoyed significantly faster response time and significantly shortened FOC intervals during the Capacity Test than were experienced in the ORT, and CGE&Y could not explain any reason that Qwest's systems performed better under increased transaction loads. Had CGE&Y conducted the ORT test results analysis required in accordance with the Test Standards Document Cap Gemini Telecommunications 271 Test Standards, Version 2.9, dated June 29, 2001[10], the unexplained and incredible improvement in results may have been resolved. At best, the capacity test response time and FOC interval results are unconvincing.

b. CGE&Y's Analysis Demonstrated that Qwest's Calculation of PO-1 Results is Non-Compliant With the PO-1 PID and Stress Volumes Yielded Excessive Response Times for CLECs.

CGE&Y was directed by the TAG to analyze Qwest's Interconnect Mediated Access Response Time Measurement ("IRTM") tool. CGE&Y stated:

> An integral part of the Capacity Test is to collect actual response times experienced by the Pseudo-CLEC in order to compare results to those reported by Qwest during the Capacity Test using IRTM. This data will be

[9] See, August 25, 2001, Transcript, at page 197, Lines 9 through 13.
[10] See, Cap Gemini Telecommunications 271 Test Standards, Version 2.9, dated June 29, 2001.

> utilized to facilitate a decision as to whether results generated from Qwest's simulated system is [sic] a true representation of pre-order transaction response times experienced by CLEC service representatives.[11]

According to Qwest, the IRTM purportedly simulates pre-order response times and can be utilized as the means to determine whether Qwest is complying with the performance measurement standard, PO-1 (pre-order/order response times). In order to confirm Qwest's assertions, CGE&Y was required to determine if the actual Pseudo-CLEC pre-order/order response times provided similar results utilizing the planned volumes for the Capacity/Stress Tests.

As an initial matter, IRTM results were captured and provided by Qwest. However, CGE&Y did not validate the results or the process employed to gather the results. As defined in the PID, one of the PO-1A and PO-1B exclusions are queries that timeout.[12] After CGE&Y's analysis of the results obtained from the Pseudo-CLEC and Qwest during the capacity test, CGE&Y determined that IRTM was designed to exclude transactions that exceeded 200 seconds in length whether or not the query actually timed out.[13] During the workshop, Qwest admitted that transactions that received a valid response longer than 200 seconds would be excluded from the IRTM results because the transactions were considered to be timed out.[14] Valid transaction responses with response times greater than 200 seconds are not truly transactions that have timed out. For Qwest to exclude these valid transactions as transactions that time-out is non-compliant with the

[11] Final Report Capacity Test, October 1, 2001, Version 1.0, p. 6.
[12] Qwest Service Performance Indicator Definitions, Arizona Working PID Version 6.3, May 1, 2001, p. 7
[13] Final Report Capacity Test, October 1, 2001, Version 1.0, pp. 41 – 42.

PO-1 PID. CGE&Y should have generated an IWO to reflect Qwest's non-compliant measurement of the PO-1A and PO-1B results, but chose not to do so.

Regardless of Qwest's inappropriate use of the 200-second exclusion, CGE&Y determined that under stress conditions (above 150% peak load), a CLEC would experience excessive response times. In addition, during the third hour of the stress test, CGE&Y determined that an IRTM outage occurred. However, instead of re-running the test, CGE&Y chose to exclude the transactions for both IRTM and the Pseudo-CLEC results. This process eliminated CGE&Y's ability to accurately reflect what would have happened had the test been re-run and the actual results been included in the evaluation. Obviously, excessive pre-order response times could have a dramatic effect on a CLEC's ability to compete in the market.

5. Relationship Management Test.

a. CLEC input into system, process and product changes.

Background information is essential when it comes to understanding Qwest Change Management Process. As an initial matter, IMA was first implemented in January 1997. Qwest formally implemented a Change Management Process whereby CLECs could provide input to systems (only) in the fourth quarter 1of 999. Qwest added a Product & Process CMP in the fourth quarter of 2000.

From January 1997 through nearly February 2002, internal Qwest change requests ("CRs") were and will be implemented without CLEC input. Only with IMA version 10.0

[14] OSS Report Workshop 3, Vol. 1, pp. 143 and 145.

will Qwest's internal CRs have been prioritized by CLEC community for scheduled release in June 2002, and even that prioritization process has not gone smoothly because Qwest's efforts to misuse "regulatory changes', to remove certain Qwest-initiated, but CLEC –Affecting CRs from the CLEC priorization vote. Thus, a total of 9 full releases were implemented without CLEC input even given the fact that Qwest formally introduced a systems change management process in the fourth quarter of 1999.

Moreover, of the releases implemented that could have included CLEC change requests (IMA versions 6.0 - 8.0), Qwest's CRs made up 74% of the total enhancements. In addition, this doesn't even include the number of "point releases" implemented that Qwest has utilized in the past to provide for new functionality.

As stated in the functionality test comments above, CGE&Y "Appendix Q - LSOG 3 comparison" provides for the variances observed between Qwest's business rules imposed on CLECs as opposed to the OBF developed LSOG guidelines. These variances provide a significant indication that pre-order to order integration can be prohibitive. However, since the Pseudo-CLEC did not perform integration testing, no real evidence is available to determine whether any pre-order to order integration is effective for CLECs..

Also noted in the functionality test comments above is the fact that Qwest converted to LSOG 5 in August of 2001 with its IMA 8.0 release. Qwest considered an LSOG 5 conversion in May 2000 and presented to the CLEC community the option to skip LSOG version 4. CLEC's agreed to skip version 4 due to the level of enhancements available in LSOG 5. What is critical; however, is that the Pseudo-CLEC remained on

EDI LSOG version 3 and as of December 7, 2001, version 3 is no longer supported by Qwest. At this point, EDI LSOG version 3 is outdated as seen by the industry with the move to support LSOG version 5.

b. FCC Factors on Change Management.

The FCC requires that:

1. *Information be clearly organized and readily accessible.* The CGE&Y table in section 5.1.4 entitled "Results" reflects the PCAT to resolve almost all the issues originally identified. The PCAT is currently part of the Change Management Process as a means to notify CLECs of changes that will impact local ordering practices. CLECs have been extremely vocal when it comes to the PCAT and through the redesign process CLECs have requested input on changes to the PCAT prior to implementation. Results of this new process remain to be seen.

2. *Competing carriers had substantial input in design and continued operation.* As noted in above a total of 9 full releases were implemented without CLEC input even given the fact that Qwest formally introduced a systems CMP in the fourth quarter of 1999. Also as noted, Qwest CRs made up 74% of the total enhancements that CLECs have had input to between the 6.0 and 8.0 releases. Until Qwest proposed to redesign CMP (formally known as CICMP), Qwest CRs were not to be considered as available for CLEC input, voting and/or prioritization.[15] CGE&Y stated "The current CICMP process is not a true collaborative effort for making changes to the

CLEC-specific pre-order, order and repair interfaces"...Qwest responded by stating that "Qwest disagrees with CGE&Y's belief as to the degree to which the CICMP process is not collaborative. It is Qwest's position that it is appropriate for CLECs to vote on CLEC initiated changes but is not appropriate for CLECs to vote on all changes.") This imposed a tremendous restriction not only on CLEC CRs but a CLECs ability to have insight to the changes Qwest imposed automatically.

3. *There exist a procedure for the timely resolution of disputes.* A dispute resolution process has been developed by the "Redesign Team" but to date, that process has not been used to test its effectiveness.

4. *There exist a-stable testing environment.*

CGE&Y opened IWO 1068 that stated "Qwest's current EDI testing process is inadequate. Qwest does not operate a fully functional, fully automated testing environment that mimics its production environment". This CR was withdrawn and referenced as a duplicate of IWO 1044. IWO 1044 stated "CGE&Y would like to request that Qwest make available a testbed for use by CLECs that desire to conduct business via EDI."

The Arizona Pseudo-CLEC noted the following flaws in Qwest EDI interoperability test environment in its published EDI Connectivity Report dated March 16, 2001: 7.3.4 Environment: Qwest did not provide a test bed for exercising CLEC-side

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[15] *See*, IWO 1075.

EDI transaction components. HPC was unable to properly exercise test harness developments prior to entering Interoperability and Certification Test phases. The absence of a test environment including a test database required that HPC submit valid account data that was present in the Qwest legacy environment. This might cause significant setbacks for Co-Providers who did not possess their own account data. In order to complete product certification, the CLEC would have to possess account order data for every product being certified. If there were certain products for which the CLEC did not possess valid customer order information, the CLEC would have to delay testing until they attained a valid customer order for that particular product. The absence of a test bed also required that a Qwest EDI support agent monitor the Co-Provider by phone during Interoperability and Certification testing periods. Co-Provider Interoperability and Certification Testing was conducted two hours a day, five days a week. This gave HPC a very limited window to test its EDI gateway developments.

Finally, the quality of Qwest's SATE is extensively addressed in WorldCom's Comments addressing Qwest's SATE filed this same date.

5. There be adequate and continuing documentation available to CLECs for building an electronic gatewey.

WorldCom comments with respect to the following CGE&Y recommendation addresses this issue:

Medium	CGE&Y recommends that Qwest publish EDI design documentation a minimum of three months prior to implementing a release. **WorldCom Comment: Design documentation allows CLECs the**

	ability to build their side of an interface in accordance with Qwest published business rules. Timely design documents provide for the means to adequately build a CLEC's side of the interface, but it is even more critical that accurate design documents are provided so that CLECs are implementing software that will not require changes prior to testing and production turn-up. Thus WorldCom not only agrees with CGE&Y recommendation but would add a layer that requires accurate design documents be published in a timely manner.

As stated in the Executive Summary of the Final Report Section "Conclusions" CGE&Y states: "CGE&Y concludes that the CICMP process represents an improvement over previous Qwest processes. A complete re-design of the CICMP process to a new Qwest CMP is in progress, and thus CGE&Y has no conclusions on the new design. WorldCom agrees that a complete re-design of the CICMP process to a new Qwest CMP is in progress and until such time as the new process can be established "collaboratively", implemented by Qwest and actively tested to ensure the processes are working as expected, no conclusions can be drawn.

Thus, WorldCom agrees the following statement made by the Staff of the Arizona Corporation Commission ("Commission") in its recommendation of Checklist Item 2[16], there must be "a demonstration by Qwest that it has an effective and workable Change Management Process ("CMP") in place."

[16] *See,* Proposed Report on Qwest's Compliance with Checklist Item No. 2, Access to Unbundled Network Elements, dated October 19, 2001, at paragraphs 4, 35 through 38, and paragraphs 316 and 317 concerning Qwest's noncompliance with CMP requirements.

6. Retail Parity Evaluation.

a. Pre-order to order integration called for in the MPT and TSD governing documents.

Section 3.3.2 of the MTP, of the Retail Parity Evaluation states "Additionally, the evaluation will determine if the data entry experience of a CLEC Service Order Entry Operator is comparable in quality and required level of effort to that experienced by the Qwest Service Order Entry Operator. Specifically, the level of pre-order to order integration in the retail and resale interfaces will be compared." (emphasis supplied.) In Section 5.8 of the MTP entitled "Retail Parity Evaluation Success Criteria" the following question was to be answered: Is the level of pre-order to order integration substantially the same for Pseudo-CLEC and Qwest Service Representatives?"

Section 3.1 of the TSD entitled "Scope" states: "The integration of pre-order data supplied by Qwest and the order data required by Qwest will be tested" making no distinction between GUI and EDI. As the Retail Parity Final Report reflects, CGE&Y only evaluated pre-order to order integration for the IMA-GUI interface. Section 3.1 "IMA-GUI Pre-order/Order" CGE&Y states "it must be pointed out that, unlike resale, Qwest retail ordering activities do not distinguish between pre-order and order transactions; for Qwest the two are combined into order transactions." Thus, prior to testing CLEC interfaces, it is a known fact uncovered by CGE&Y that 100% integration is provided to Qwest service representatives.

As stated above, IMA-GUI provided for software that was based on LSOG version 5 whereby, if tested, the Pseudo-CLEC would have been required to validate pre-order to order integration was viable utilizing LSOG version 3. Given the variances provided in CGE&Y Appendix Q – "LSOG 3 comparison" it is quite conceivable that a greater level of integration was provided for the IMA-GUI interface vs. that of EDI interface the Pseudo-CLEC was certified on (IMA 6.0). Again, in accordance with the MTP, the TSD and the FCC requirements, pre-order to order integration must be tested in order to conclude that CLECs are provided a meaningful opportunity to compete and are treated in a nondiscriminatory manner vis-à-vis Qwest's retail customer service representatives.

b. Significant IWOs issued.

CGE&Y found disparity in the number of fields and steps required for CLECs using IMA-GUI to complete an order (including pre-order steps) compared Qwest retail operations. The number of fields and steps was greater, across most scenarios, for CLECs. During re-test of this problem, CGE&Y concluded that only 15% of the fields required for POTS were manual entry for CLECs. There is insufficient factual information in the final report to support CGE&Y's conclusion that only 15% of the fields required for POTS were manual entry for CLECs. As well, the original test provided for disparity "across most scenarios" while the re-test only looked at POTS. Until it is clear with factual evidence that CLECs are minimally impacted by the manual processing of data to issue orders, no real conclusions can or should be drawn, particularly since Qwest

customer service representatives are provided 100% integration between pre-order and order.

IWO 1110 uncovered that "total pre-order query response times finds that across the scenarios, resale response times were substantially, and statistically significantly longer than for retail". During re-test, CGE&Y eliminated the http timing delays and concluded that the resale and retail experiences were substantially similar. Once again there is insufficient factual information to support CGE&Y's ability to identify much less confirm that elimination of http timings resolved the earlier concerns.

Also worth noting is that fact that CGE&Y determined it might be possible for Qwest to make the mediation process ("IMA") of these interfaces faster and more efficient but did not apparently perform root cause analysis as required by the Test Standard Document ("TSD"). The TSD states that, "The TA will perform root cause analysis for test cases in which variation in cumulative test measurements between the paired retail-resale tests show significant advantage in favor of U S WEST performance." Presumably CGE&Y did not perform a root cause analysis because it concluded that the paired retail-resale tests did not show a significant advantage in favor of Qwest's performance. However, without a full factual statement of why CGE&Y made this recommendation and a factual basis for why it apparently concluded that the paired retail-resale tests did not show significant advantage in favor of Qwest's performance, this Commission and the FCC cannot determine whether Qwest should, in fact, make its mediated access faster and more efficient in order to ensure Qwest does not have a significant competitive advantage.

Regarding reservation of large blocks of TNs, in the final report a Page 23, CGE&Y responds to the question, "Is the procedure used to reserve large blocks of TNs substantially the same for both a PCLEC service representative and a Qwest service representative?" CGE&Y found: Objective satisfied = Y (yes). Yet the Comments state "During the retail parity re-evaluation, CGE&Y determined the resale representatives do not call the same telephone number to reserve large blocks of TNs as the retail representatives. The resale representative receives the requested TNs via FAX, while the retail representatives receive the TNs real time during the call. The times ranged from 23 minutes to 1 hour 10 min from the time the call was placed to the ISC until fax was received [by a CLEC]."

WorldCom belies the following recommendation is an effort to address this negative finding: Low priority: CGE&Y recommends that Qwest improve the process for CLECs to reserve large blocks of Telephone Numbers. AS noted earlier in its discussion of the 16 recommendations, WorldCom believes that such an improvement would provide greater efficiency when CLECs are in need of reserving large blocks of TNs for their end users. This scenario is most prevalent when businesses are looking to have associated TNs. Thus, WorldCom supports this recommendation and regardless of the priority sees this as a critical element to CLECs ability to efficiently process orders.

WorldCom also notes that on Page 231, CGE&Y asks and answers the following question: Is substantially the same opportunity provided to the PCLEC service representative and the Qwest service representative to expedite due dates? Objective

satisfied = Y (yes). Comments state " As a result of the functionality re-test and the retail parity re-evaluation, it is CGE&Y's opinion that the process to request an expedited due date is substantially the same for the resale rep and the retail rep." Once again the factual evidence is lacking in the Final Report that would support such a conclusion.

7. Performance Measurement Test (aka "Data Reconciliation)

a. Independent calculation of all measurements.

Page 113 of the final report states and requires : Independent calculation of all measurement indicated in Appendix C of the MTP for the Pseudo-CLEC according to the statistical approach outlined in Section 9 of the TSD. This included adding the missing data elements not transmitted via the gateway that were necessary to complete the calculations. The missing elements were extracted from Qwest's adhoc information by completing a reconciliation between the PCLEC data and the adhoc data. However, the TAG is awaiting spreadsheet that quantifies per measure how many data elements required the use of Qwest adhoc data to recalculate, instead of Pseudo-CLEC data.

The above is the key issue that remains open. Until the parties can determine and quantify what level of data required the use of Qwest's adhoc data, no further discussions should take place. What is known now is that the following are the only PIDs able to be recalculated utilizing 100% of the Pseudo-CLEC data generated in the funtionality test: OP-7, OP-13 (A&B), BI-2, BI-4A.

b. Inconsistent use of aggregated CLEC data.

At Page 114 of the final report states: CGE&Y issued IWOs for all disparities and benchmark failures for the Pseudo-CLEC. If the Pseudo-CLEC results indicated a disparity, CGE&Y analyzed Pseudo-CLEC and commercial CLEC data during the retest period where available. Where Pseudo-CLEC data was insufficient for a parity/disparity determination, CGE&Y relied on aggregate CLEC data. In these cases where aggregate CLEC indicated a disparity, CGE&Y issued an IWO. However, in those cases where sufficient Pseudo-CLEC data existed and indicated parity, a disparity for the aggregate CLEC results was out of the scope of the AZ 271 engagement and is associated with the future performance assurance process

c. Flow-through rates for PO-2.

At Page 122, concerning Electronic Flow-Through (PO-2); The Measure Description states: Flow-through rates are highly dependent on the training and expertise of the CLECs. Significant differences between Pseudo-CLEC and aggregate CLEC results may be due to lack of training. In addition, the nature of Pseudo-CLEC LSRs may be materially different from those issued by commercial CLECs. CGE&Y recognizes that due to requirements of the test, the mix of Pseudo-CLEC issued LSRs may differ substantially from a commercial CLEC.

d. Lack of findings for certain measures.

Simply put, CGE&Y failed to make any findings with respect to the following measures due to lack of standard: PO-2A1, PO-2A2, PO-2B1, PO-2B2, PO-4, PO-6 A&

B, OP-7, OP-13B and MR-10 WorldCom believes findings should have been about performance whether a standard existed or not..

e. Lack of Pseudo-CLEC data.

There was no Pseudo-CLEC data for LNP (aggregate reflected a problem) (211 retested OK).; for fully manual FOCs (aggregate CLEC failed to meet 90% benchmark). During the retest period, out of 23 LNP LSRs submitted by commercial CLECs via fax, 95.65% received a FOC on time. As a result, AZIWO2126 was closed, or for Centrex 21 (aggregate reflected parity with Qwest).

8. Comments on PMA Report

a. General.

In many cases the language used by CGE&Y in the PMA Report is vague or additional information needs to be provided to clarify the findings in the report. In several instances use of such words as "intended to be consistent", "found close agreement", "generally", "immaterial", and "negligible" are not defined and leave open questions as to whether all issues have been truly been resolved and verified. Many of the questions attached to these comments are questions that WorldCom asked with respect to the interim report that were never addressed by CGE&Y.

b. Inadequate Documentation.

One of the key areas that CGE&Y noted when it conducted the audit was the need to improve the documentation supporting the gathering, calculating and reporting on the performance measures. The PMA Report states that "As a result of the PMA and the fifty

IWOs relating to documentation discrepancies, Qwest updated its technical documentation to reflect actual practices and for clarification where needed".[17] Given the great number of issues CGE&Y found relating to Qwest's documentation discrepancies that required significant updates from Qwest to reflect actual practices, what confidence does CGE&Y have that but for its audit and 271 approval looming over Qwest that the types of updates Qwest was required to perform as a result of discrepancies discovered by CGE&Y will continue to be made in an accurate and timely manner in the further once 271 approval has been grated to Qwest?

c. Common Exclusions.

As CGE&Y states in its report, Qwest applied a series of common exclusions to the DETAIL data set for the mechanized measures. [18] Not all of these exclusions were specified in the PIDs, and the Arizona TAG expressed concern over the appropriateness of applying these common exclusions. The report states that CGE&Y closed both IWOs but recommended a reporting mechanism whereby CLECs are kept apprised of the number of records subjected to certain common exclusions.

The use of a reporting mechanism will allow a better investigation all participants and interested parties of which common exclusions should be applied to the DETAIL data. These exclusions are applied to the DETAIL data set contained within PANS. The data are recoverable and all previously reported measures can be recalculated in any manner

[17] *See*, PMA Report at Page 23.
[18] *See*, PMA Report at Page 24.

the parties agree is appropriate. WorldCom supports CGE&Y's recommendation to develop a reporting mechanism whereby CLECs are kept apprised of the number of records subjected to certain common exclusions, All previously reported measures should be addressed to determine how these measures should be recalculated and Qwest should be required recalculate those measures.[19]

d. Time to Produce Results.

CGE&Y states that for an ILEC to have a successful §271 application, there must be a formal means of reporting performance measurement results on a monthly basis and in a timely manner. The report states that in the two states were the BOCs had been successful in obtaining Section 271 authorization by December 2000, report measures were provided via the Internet generally within 15 to 20 days following the end of the reporting period. The report further states that Qwest began providing its report via a web site; however, there was still an average 45-day delay before results were available.

While in some cases Qwest may now be providing reports prior to the end of the following month, there are still times when Qwest does not provide notification of results until after the following month. As of January 17, 2002, Qwest still had not published the January 1, 2001 through December 31, 2001 report. For the prior 6 moths of notification, the results have averaged 31 days that is still much greater than the 15-20 days reported above for BOCs in the other states that have had a successful 271 application.

[19] *See*, PMA Report at Page 67.

Finally, CGE&Y has found some discrepancies between Qwest's calculation of a measure and what was required in the PID. While CGE&Y states that it is satisfied that differences are due to misinterpretation or a lack of clarity contained in the PID, and not an intentional act on the part of Qwest, the discrepancies still exist and Qwest's lack of intent is irrelevant.[20]

e. Statistical Test.

The report states that Qwest responded to AZIWO2038 by acknowledging the problem and working with CGE&Y statisticians to resolve the issue. CGE&Y received the new code along with the September adhoc, master results and published results and was able to verify this fix. The IWO was closed however, CGE&Y stated it has concerns on whether the permutation test itself is the proper test to use as the results can differ significantly from more robust and powerful non-parametric rank-based methods (Wilconon-Mann-Whitney test). This is true when the permutation test is performed on the original data or on transformed data that diminish the effect of skewness and outliers.

CGE&Y stated that is was also concerned with the exact form of the test to be used, namely a permutation test based on a Modified Z or one based on the Standard Z test. CGE&Y considered these issues to be outside the scope of the performance measurement audit but should be discussed between the parties and the commission as part of a performance assurance plan.[21] No such discussion has occurred to WorldCom's

[20] *See,* PMA Report at Pages 25, and 77-78.
[21] *See*, PMA Report at Page 128.

knowledge. Moreover, CGE&Y's should provide more guidance and the "pros and cons" on using the permutation test or the non-parametric rank-based methods

f. Accuracy of Qwest's PM reporting.

1. Annual audits.

CGE&Y recommends that annual audits be conducted on all measures based on a quarterly schedule to guarantee the continued accuracy of Qwest's Performance Measurement reporting. Given that the audit began in August of 2000 and that different versions of the PID were in effect as each measure was undergoing the audit process, much of the PIDs that have been audited have since gone through changes or additional PID information has been added leaving the audit report out dated. WorldCom supports CGE&Y's recommendations that annual audits be conducted on all measures based on a quarterly schedule to guarantee the continued accuracy of Qwest's Performance Measurement reporting.

2. Mechanized versus Manual

The PMA report also discusses the need to mechanize measures and the need to eliminate manual methods in an effort to eliminate human error. Based upon "Manual Report" generated by Qwest on January 22, 2001, 55% of Qwest's PIDs require some sort of manual processing (collection/calculate/load) in order to produce the results. The ROC Steering Committee recently approved higher flow-through rates proposed by CLECs for PO-2B stating that high flow-through levels are important to local competition and that Qwest's benchmark proposal did not seem sufficiently aggressive compared to its recent

performance. Therefore, Qwest must eliminate manual methods in its reporting, and the levels of manual activity is still unacceptable.

3. Liberty Data Reconciliation

In it Colorado Data Reconciliation Report, Liberty Consulting Group found that Qwest was blaming CLECs for missed commitments when the cause really should have been assigned to Qwest. The end result is that Qwest's self-reported data will look better than its actual results and performance. Qwest's inappropriate assignment of miss codes to CLECs will also shorten the average installation interval.

Liberty also found in its Colorado Report that, "Qwest cannot always support the application times it used in developing the performance results". If Qwest cannot accurately and reliability record the time it "starts the clock" for interval measurements, then any measurements that rely upon the application date and time should be considered inaccurate and unreliable.

CONCLUSION

For the reasons stated above, Qwest has failed to pass the OSS Test and there remains further testing to be done before it can be concluded Qwest has passed the OSS Test. In addition, further factual findings must be made by CGE&Y to support its conclusory statements that suggests that Qwest is providing nondiscriminatory access to its OSS and providing CLECs with a meaningful opportunity to compete.

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RESPECTFULLY submitted this 18th day of January, 2002.

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