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**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

**AT&T'S COMMENTS ON THE HPC
PREORDER TO ORDER SUMMARY
REPORT**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T") hereby file their comments on Hewlett-Packard Consulting's ("HPC") PreOrder to Order Summary Report, version 2.0, dated January 28, 2002.

I. INTRODUCTION

The Test Standards Document ("TSD") required the Test Administrator, Cap Gemini Telecom Media Networks U.S., Inc. ("CGE&Y"), to review the IMA GUI and EDI interfaces to determine whether a competitive local exchange carrier ("CLEC") can integrate information received during the pre-order process into the order process, and whether that information can be integrated without data manipulation. CGE&Y analyzed pre-order to order integration for the GUI interface but failed to perform the required analysis for the EDI interface. Due to this omission, the Staff, without the knowledge of the Test Advisory Group, instructed HPC to conduct a limited analysis of the EDI interface.

II. COMMENTS

A. Staff Limited The Analysis Required by Test Standards Document

The TSD at section 6.5.2.3 identifies the question that is to be answered by the Test Administrator:

Do the data definitions (i.e., form, format, content, usage and meaning) between pre-ordering and ordering elements enable integration from pre-order transactions into order transactions without requiring translation, or reconfiguration of the data elements

To reach a conclusion, it is necessary to look at the extent to which GUI and EDI interfaces contain the requisite data in the pre-order query responses and the ordering transactions that allow CLECs to use the response data to format the resulting order. If the data is available for insertion into the order, does it require transformation to meet the ordering specifications?

Staff engaged HPC to conduct the analysis on a limited set of EDI transactions to form a conclusion as to the integrateability for EDI.

- a) Determine the level of effort required to review Qwest EDI documents and determine the level of integration offered by Qwest.
- b) Review the documents, discuss with Qwest EDI resources and produce a report on the level of integration.¹

Staff required less of an effort from HPC than the TSD calls for. Staff limited the analysis to a small handful of transactions and not the full set of pre-ordering and ordering requirements required by the TSD. Staff reduced the analysis effort to 9 order scenarios so that HPC could

¹ *Subject: Summary of Communications on Pre-Order to Order Analysis e-mail from T. Neville to Staff (ACC and DCI) February 1, 2002.*

complete its analysis and render its opinion by December 1, 2001. As late as October 30, 2001, HPC proposed to conduct its evaluation on 11 ordering scenarios, but apparently the amount of analysis that could be done by HPC was later reduced to 9 scenarios so that a report could be provided by the arbitrary due date.

HPC did not use MTP Appendix A scenarios for its analysis; rather, it relied on Qwest's Disclosure Documents to determine the data elements required for placing EDI local service requests ("LSR"). The difference between the two reference points is not trivial. During the course of its role as the Pseudo-CLEC, HPC found that Qwest's EDI documentation was not fully accurate, and Incident Work Orders ("IWOs") were issued to cause corrections to be made to the documentation. Other problems that HPC found with the Qwest documentation were recorded as IWO "candidates" for which CGE&Y failed to issue the corresponding IWOs. At the very least, the order types to be used for the pre-order to order integration analysis should have been replicated from the MTP Appendix A "Test Scenarios." The data requirements to be evaluated should have been those that the Pseudo-CLEC found to be required from its use of Qwest's system and not those that were unreliable, even based on its own experience.

B. HPC's Analysis Was Limited and It Failed to Submit Orders Based on Its Integration Model

HPC appears to have performed its pre-ordering analysis on the basis of its experience: "HPC utilized locally developed job aids and HPC's interpretation of Qwest's Business Rules to determine the PreOrder transactions required for each Order." *Report* at 12. Its analysis shows an illogical application of pre-ordering requirements for several of the orders. As provided in Table 4.2 (at 12) POTS Resale Conversion as Specified, it required analysis of six of the seven pre-order query types. For each of the other orders that call for "as specified" processing, HPC

failed to evaluate the Appointment Scheduling and Service Availability queries. Because “as specified” means that the CLEC order identifies all services that are to be provisioned by Qwest, the Appointment Scheduling and Service Availability queries are key to the determination of whether the “as specified” services can be provisioned on the due date and at the location(s) indicated on the order. These additional query types should be included in the UNE Loop Service Conversion As Specified, the UNE-P Conversion As Specified with DL, and the Loop Service with NP Conversion As Specified orders.

HPC did not actually perform the integration of pre-order information into LSRs for its analysis. It conducted a “paper” analysis to make its determination. The ability of HPC to make a determination of integrateability on the basis of documents alone, and not by actually issuing test LSRs that were formed from test pre-order query responses, requires a leap of faith. HPC should have actually submitted LSRs that were formed from the model of integration that it constructed to determine if those LSRs could be processed by Qwest. Staff did not engage HPC to conduct its analysis the way HPC would have designed its work or its work product. The time for HPC to do what it thought appropriate was not made available, and through discussions with Staff, the scope of its work was prescribed by Staff. The conclusion HPC reaches that “CLECs can utilize Qwest’s EDI pre-order transactions to submit an Order without data manipulation” is not based on any empirical data that shows that an order so formed would actually be accepted by Qwest’s EDI interface.

It is unclear from HPCs report how it determined data elements that are to be provided by Qwest versus those that are provided by the CLEC. “HPC then identified for each Order’s data element whether the value had to be provide (sic) by Qwest (i.e., Qwest Provided column) or the CLEC (i.e., CLEC Provided column).” Report at 13. This is key to the evaluation because the

extent to which the data elements are required to be provided by the CLEC is the core of the integrateability issue. An interface that precludes integration of pre-order to order would require that 100% of the data elements be provided by the CLEC. The extent to which that percentage is reduced by a CLEC being able to use information from Qwest's responses to pre-order queries is the extent to which integration is possible. The basis for HPC's determination must be explained in detail sufficient for a CLEC to arrive at the same conclusion of integrateability for its EDI interface.

C. HPC Inappropriately Allowed Qwest to Review Its Initial Analysis

HPC allowed Qwest to contribute to its analysis, and this fact imposes on the independence of its analysis and its findings. With no apparent urging from Staff, HPC delivered its initial analysis regarding whether Qwest's specifications reflect conditionality to Qwest for review and correction. It is unclear why HPC would need Qwest's expertise to check its work that was foundational to its later analyses.

HPC made an initial determination of the conditionality (required, conditional, optional, not required, or prohibited) of each Order's data element based upon the information in Qwest's I-Charts. This data was then passed onto Qwest to verify the conditionality of each Order's data element. *Report at Page 13.*

D. HPC's Analysis Was Conducted On An Outdated Release of EDI

HPC conducted the evaluation on the basis of Qwest IMA EDI interfaces that are no longer usable by any CLEC. Qwest's IMA Release 6 introduced LSOG3 pre-ordering and ordering guidelines and those have been eclipsed by Qwest's movement to LSOG5, the industry's current level of standards for pre-ordering and ordering. Qwest has implemented LSOG5 in its IMA Release 8.0 and that set of specifications should have been used to conduct

the evaluation. While the TSD is not specific as to which version of the interfaces should be used to conduct the required testing, common sense would compel using specifications that are at least usable by a CLEC that wanted to avail itself of the integration analysis. HPC's analysis is of no use to CLECs because IMA Release 6 has been retired. The proper evaluation should advise the Commission and the industry what the level of integration *can be* – having a report on the level that *could have been*, seems senseless.

E. The Extent To Which Changes Have Been Coordinated Between Pre-ordering Specifications and Ordering Specifications Needs To Be Evaluated

There is no evidence available to show that Qwest has kept up with a practice of data element specification that allows CLECs to integrate pre-ordering query response information into corresponding LSRs as it has moved forward with newer implementations of the interfaces; *i.e.*, IMA Releases 7, 8, and 9. The fact is that significant changes have been made to the pre-ordering and ordering data elements in these subsequent roll-outs of the IMA EDI specifications and the extent to which the changes have been coordinated between pre-ordering query response specifications and ordering specifications needs to be evaluated.

When Qwest implements a new IMA version it provides users with Network Disclosure documents with which it explains the interface requirements that it defines in that new release. The worksheets are supplemented by additional documents (Disclosure Addenda) that users reference to determine the extent to which the changes have been made from prior releases. The EDI documentation and specifications are arranged by chapters in the Disclosure documentation and are further explained in Developer Worksheet Appendices, Change Summary Appendices, and other documentation posted to Qwest's web site.

The extent to which the pre-ordering and ordering interfaces have changed between Release 6 and Release 9 is apparent by review of the updated interface specifications. The

changes made from Release 6 to 7 are summarized in the “Developer Worksheets – Change Summary 6.0 to 7.0” and “EDI Mapping and Data Dictionary Changes 6.0 to 7.0.” These documents are over 87 and 52 pages in length, respectively. Looking specifically at the changes made to street address specifications,² the Change Summaries highlight the fact that Qwest made significant and widespread changes to street address specifications when it introduced Release 7. See Developer Worksheets – Change Summary 6.0 to 7.0, at 1-4. These widespread changes compel an evaluation of whether the street address conventions adopted by Qwest in Release 7 continue to enable the use of the pre-order query responses as inputs to the ordering responses “requiring translation, or reconfiguration of the data elements.” TSD, § 6.5.2.3.

Furthering the focus on the extent to which Qwest has made significant changes that may affect the extent to which pre-order to order data can be integrated for EDI users, the Change Summary documents for Release 7 to Release 8 contain 185 and 107 pages; and for Release 8 to Release 9, they contain 293 and 40 pages. Obviously, the extent to which these changes alter the integrateability of pre-order to order in these current releases cannot be determined on their surface. Peering into the Change Summaries for these later two releases show significant impacts caused by changes to Qwest’s business rules for street address specifications. The unanswered question is whether Qwest’s interfaces enable an EDI user to integrate pre-ordering information obtained from Qwest, into orders to be submitted to Qwest.

F. Required, Conditional and Optional Data Elements

HPC shows in Table 4.6 that there are Required, Conditional, and Optional data elements that are provided by Qwest and by the CLEC, within the context of the ordering scenarios. The number of Required and Conditional Qwest entries should reflect the extent to which pre-

² HPC’s report shows that it has determined street address data elements to be integrateable. See Tables 4.7 through 4.15.

ordering data elements can be moved into the order format. The data elements that can be integrated are shown in Tables 4.7 to 4.15, and these should demonstrate the data elements from Table 4.6 Qwest Required and Conditional, but they do not. It is not clear why there is any difference in the number of data elements (*i.e.*, the sum of Required plus Conditional in Table 4.6 and the number of data elements shown in the subsequent tables), since they should be reflecting the number of integrateable data elements for each of the order scenarios.³

HPC highlights the extent of the data element manipulation requirement by mapping the pre-order data elements to the respective data elements in Tables 4.7 through 4.15. "If PreOrder transactions returned a value larger than the Order field would accept, some data manipulation would be required." *Report* at 33. For each of the data elements where the Order Field Length & Type exceed the Pre-Order Field Length & Type, the CLEC must have access to Qwest documented business rules that advise the ways in which the pre-order data element is to be trimmed to meet the more limited ordering requirement. If the business rules are not clearly defined, the CLEC will make a judgment call that could cause its interpretation to run afoul of the Qwest system edits that enforce the business rules. HPC does not advise that Qwest's cropping instructions are thoroughly defined and documented.

HPC's conclusion is counter to its own data shown in these tables. It shows that there are significant differences in Field Length between Pre-Order and Order, and without indicating that Qwest has documented business rules so that CLECs know how to truncate the pre-order response, it concludes:

In summary, HPC concludes that the data definitions (*i.e.*, form, format, content, usage and meaning) between Preordering and Ordering elements, *excluding the exceptions noted above*, do not require translation, or reconfiguration of the data elements when integrating PreOrder

³ AT&T submitted written questions to HPC to obtain clarification on this issue. AT&T expects the HPC answers by end of business February 11, 2002.

transactions into Order transactions. Therefore HPC's assessment is that CLECs can utilize Qwest's EDI pre-order transactions to submit an Order without data manipulation. *Report* at 3, (*emphasis added*).

HPC's conclusion on data manipulation cannot stand.

G. HPC and CGE&Y Reach Opposing Conclusions on Qwest's EDI Interface Conformance with ATIS Standards (LSOG 3)

HPC arrives at a conclusion that is not supported by CGE&Y's evaluation of Qwest's use of OBF LSOG3 standards. On the one hand, "HPC observed that Qwest is following the OBF LSOG guidelines." *Report* at 38. On the other hand, CGE&Y comes to the opposite conclusion in its Draft Final Report: "CGE&Y's analysis of this issue indicates that Qwest deviates significantly from the LSOG 3 in its business rules for local service ordering." DFR, § 5.5.2. This difference of opinion needs to be reconciled.

III. CONCLUSION

The HPC analysis is inadequate for the reasons stated by AT&T. Staff did not provide HPC with sufficient time to do the analysis. However, had Staff allowed HPC more time, AT&T's conclusion likely would not have been any different because HPC analyzed an outdated version of EDI.

AT&T recommends that Staff engage HPC to conduct the EDI integrateability evaluation on the basis of Qwest IMA Release 9. Release 9 is scheduled for implementation this month or next and is available for testing. The engagement should require HPC to test orders that it has integrated from pre-order transactions through the Qwest SATE. The ordering and pre-ordering scenarios should be obtained from the MTP Appendix A and agreed upon by the TAG prior to commissioning the engagement. HPC should make clear its basis for determining the data

elements that are to be provided by CLECs versus via pre-order query responses, *i.e.*, Qwest-supplied. HPC should review Qwest's business rules to determine whether they are sufficient so that a CLEC can accurately carve out the unneeded pre-order information that is to fit into shorter ordering fields. Qwest should not be allowed to review HPC's work any earlier than any other party. Staff should insist that CGE&Y and HPC provide an informed opinion as to the extent to which Qwest conforms its pre-ordering, ordering, and post-ordering interfaces to OBF standards.

Respectfully submitted this 11th day of February 2002.

**AT&T COMMUNICATIONS
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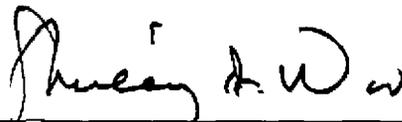
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