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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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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

QWEST'S COMMENTS
REGARDING HP'S INTEGRATION
REPORT

Qwest Corporation submits these comments regarding Hewlett-Packard Consulting's (HP) Preorder to Order Summary Report. HP followed the TSD when conducting its integration review, and the conclusions in HP's report should resolve any question that CLECs can integrate between preorder and order when building to Qwest's EDI interface.

1. HP followed the TSD.

At the workshop, AT&T suggested that HP should have created a test plan for the integration review and submitted to the TAG. There was no reason for HP to do so. The parameters of the integration review were set forth in the TSD, and HP followed the TSD in issuing its report.

As set forth in the Report, HP conducted an assessment of the level of mechanized integration between EDI preorder responses and order transactions. By doing this analysis, HP answered the question set forth in Section 6.5.2.3, Paragraph (f) of the Test Standards Document (TSD):

Do the data definitions (i.e., form, format, content, usage and meaning) between PreOrdering and ordering elements enable integration from PreOrder

transactions into order transactions without requiring translation, or reconfiguration of the data elements.

HP did an analysis based upon nine different product activities -- POTS resale conversion as is, POTS resale conversion as specified, POTS resale new install, UNE loop service conversion as specified, UNE loop service new install, UNE-P new install, UNE-P conversion as specified with directory listing, number portability conversion as specified, and loop service with number portability, conversion as specified. (Final Report Workshop, January 31, 2002, p. 668). The preorder transactions associated with these different product activities were: address validation, appointment scheduling, connecting facilities assignment, customer service record, facilities availability, service availability, and TN reservation or telephone number reservation. (Final Report Workshop, January 31, 2002, p. 668).

HP conducted the test in a three-step process. The initial step was to identify the order data elements for the product activity type, using the Qwest interconnection charts, or I-charts, on the Qwest website. The second part of the analysis was to determine the order data elements that were to be provided by Qwest via the preorder responses, and those that were to be provided by CLEC. The I-charts were used to determine if the order data elements were required, conditional, optional, prohibited, or not required. The third portion of the analysis was that HPC mapped the preorder data elements to the order data elements and noted any issues with data definitions, i.e., form, format, content, usage and meaning. (Final Report Workshop, January 31, 2002, p. 669-670).

It is clear that HP conducted a thorough and complete evaluation of integration, and that its evaluation was consistent with Section 6.5.2 of the TSD.

2. It is clear that CLECs can integrate preorder and order.

HP observed that Qwest is following the OBF LSOG guidelines and that the data definitions, i.e., form, format, content, usage and meaning between preordering and ordering elements do not require translation or reconfiguration of the data elements when integrating preorder transactions into order. Therefore, HP's assessment is that CLECs can utilize Qwest's EDI preorder transactions to submit an order without data manipulation. (Final Report Workshop, January 31, 2002, p. 669-673).

At the workshop, Qwest also submitted a letter from Telcordia indicating that Telcordia has developed an interface to Qwest's EDI interface, and that Telcordia has been able to integrate preorder and order. (Exhibit Qwest 8-7).

Based upon the HP report and the information from Telcordia, the Commission should be confident that CLECs are able to integrate preorder and order when developing interfaces to Qwest's EDI interface.

3. HP's evaluation of LSOG 3 (IMA 6.0 and 7.0) is consistent with the TSD.

AT&T also objected that HP conducted its review of integration on Qwest's implementation of LSOG 3 (IMA Versions 6.0 and 7.0), rather than LSOG 5 (IMA Version 8.0). IMA Versions 6.0 and 7.0 are based upon LSOG 3 standards, while IMA Version 8.0 is based upon LSOG Version 5. Qwest's IMA Version 7.0, which is based upon LSOG 3, is still in use, and will remain available until summer.

The OSS test as a whole was conducted on IMA Version 6.0, and HP acted consistently with the MTP and TSD when it evaluated that version of the interface:

13 MR. NEVILLE: Tim, if I can add something
14 real quick, also. I want to concur with Andy's
15 statement there, is that our analysis was based upon
16 what version we were running when we did the

17 functionality test, and so this analysis was based
18 upon those requirements, the LSOG 3 and so forth that
19 the functionality test was ran on early last year. So
20 I just wanted to clarify that.

(Final Report Workshop, January 31, 2002, p. 694).

During the workshop, AT&T admitted that LSOG 5 will actually improve the ability for CLECs to integrate EDI interfaces, and that the issue it had was really whether Qwest followed the LSOG 5 standards.

4 MR. CONNOLLY: If they followed the standards
5 we'd have a pretty good level of confidence. But we
6 know from Cap's report on LSOG 3 that there's a
7 significant departure from the standards. So what we
8 don't have an answer for is how far apart are we on
9 Qwest's deployment and the industry standards?

(Final Report Workshop, January 31, 2002, p. 693).

During the workshop, AT&T also admitted that Qwest did a good job migrating to new standards versions:

19 MR. CONNOLLY: It's always a -- standards are
20 evolving, and Qwest's progress and working with,
21 migrating to current levels has been as good as any
22 RBOC that I've seen across the country.

(Final Report Workshop, January 31, 2002, p. 692).

Because the OSS test as a whole was conducted on Version 6.0, it was only natural that HP conducted its integration analysis on IMA Version 6.0. Furthermore, the evidence indicates that LSOG Version 5 should only improve the ability of CLECs to integrate between preorder and order.

4. Qwest explained that its performance was even better than reported by HP.

As noted above, HP found that Qwest's EDI interface could be integrated, and the letter from Telcordia proves that CLECs are developing integrated interfaces in Qwest's region.

During the workshop, Qwest explained that the facts are even better than reported by HP. As Jeff Thompson of Qwest pointed out, HP found exceptions in only six fields. (Final Report Workshop, January 31, 2002, p. 697). He explained the situation behind each field:

3 MR. THOMPSON: The six fields are cited in my
4 copy of the preorder to order summary report on
5 Page 3538. They are cited in the paragraph above
6 Table 6.2, and I'll be stabbing through each one of
7 those fields.

(Final Report Workshop, January 31, 2002, p. 698).

Mr. Thompson explained that the date and time fields are not the same for preorder as order, and therefore could not be integrated:

8 The first one they site is the date and time
9 sent field. While it is true that there is a date and
10 time sent field on the preorder transaction, and
11 there's a date and time sent field on the order
12 transaction, the date and time sent are -- those two
13 different transactions are not the same, typically,
14 and one would typically not expect them to map between
15 those two transactions. So stating it that way, as
16 you don't move that preorder field between preorder
17 and order may be true, but may be a little bit
18 misleading.

(Final Report Workshop, January 31, 2002, p. 698).

Mr. Thompson explained that the CLEC, not Qwest, provides the information for the type of service field:

19 The second field is a type of service field.
20 And the type of service field is basically an
21 indication by the CLEC of the type of service that
22 they want to receive from Qwest, and basically needs

23 to be generated by the CLEC. I think the issue here
24 is that it's generated by the CLEC once in preorder,
25 and then it's generated by the CLEC a second time in
1 order. However, it is a CLEC initiated field, and
2 Qwest could not, on its own, kind of determine what
3 service the CLEC, which to order.

(Final Report Workshop, January 31, 2002, p. 698-99).

Mr. Thompson explained that, like the type of service field, the NC/NCI field is completed with information from the CLEC:

22 And then the last field is the NC NCI codes
23 and network channel codes. The network channel codes
24 are analogous to the type of service today. They
25 indicate to Qwest the type of facility or type of loop
1 service that the CLEC would like to order from Qwest,
2 and again, it's supplied to us in preorder
3 transactions, such as facility availability to simply
4 ask is a facility for this type of service available,
5 okay, and then as supplied again later in the order
6 query, in the LSR itself stating I'd like to order a
7 loop or service of this type.
8 Again, it's one that needs to be provided by
9 the CLEC, because the CLEC is determining what type of
10 service they'd like to order.
11 That was a real quick summary of the six
12 fields and the status on those six fields that are in
13 this report.

(Final Report Workshop, January 31, 2002, p. 698-700).

Mr. Thompson explained that Qwest has resolved the issues related to the NAN, conversion indicator and BAN 1 fields:

4 The next three fields I can talk about at the
5 same time. They are the NAN field, which is the new
6 account number field; the conversion indicator field,
7 which is a field that is used in a partial conversion,
8 which a customer has more than one line, and a CLEC is
9 taking some subset of the total of customer lines that
10 basically says how many you're taking. The last field
11 is the BAN 1 field, which is billing account number
12 field that basically reflects the summary billed or

13 the account that the CLEC will be billed on using this
14 particular order.
15 In all three of those cases, Qwest has made
16 subsequent changes to the system that provides a
17 mechanism for determining those fields in an
18 alternative fashion other than having CLECs, and put
19 those fields on the order. So again, the need to map
20 between preorder and order for those three fields has
21 gone away.

(Final Report Workshop, January 31, 2002, p. 699).

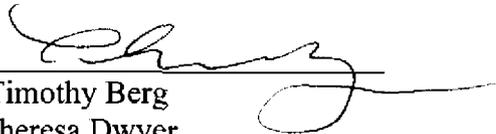
IV. CONCLUSION

Based upon the evidence in the record, there should be no question that CLECs can integrate between order and preorder while building to Qwest's EDI interface. HP held in its report that integration is possible, and Qwest explained that the facts are even better than reported by HP. The letter from Telcordia provides even more evidence of the ability of CLECs to integrate Qwest's EDI interface.

Dated this 12th day of February, 2002.

Respectfully submitted,

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