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**BEFORE THE ARIZONA CORPORATION COMMISSION**

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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  
ARIZONA § 271 PERFORMANCE  
INDICATOR DEFINITIONS (PID)  
DATA ELEMENT SUMMARY  
REPORT**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T"), hereby file their comments on the Arizona § 271 Performance Indicator Definitions (PID) Data Element Summary Report, version 1.0, dated January 18, 2002, a joint report of Cap Gemini Telecom Media & Networks U.S., Inc. ("CGE&Y") and Hewlett-Packard Consulting ("HPC").

Test Standards Document, section 7.3.4, lays out the testing requirement that CGE&Y failed to comply with and caused CGE&Y and HPC to issue the Report and PID Matrix:

Using the raw data (before exclusions) from Qwest, the TA will perform an independent calculation of all measurements with a "Yes" indication in the MTP Appendix C and will also perform an independent calculation of the same measurements for the same orders using the Functionality Test Data provided by the Pseudo-CLEC.

CGE&Y has advised the TAG that it cannot fulfill this requirement because all of the data necessary to perform the independent calculations using the Pseudo-CLEC data is not available.

In a failed attempt to satisfy the TSD requirement, CGE&Y claims to have reconciled the

Pseudo-CLEC data that it does have with the information resident in Qwest “ad hoc” databases and then using those data to recalculate the results. The amount of “ad hoc” data used to perform the calculations that CGE&Y made for its Functionality Test reporting (section 2.5 of the Draft Final Report) is disquieting.

This Report became necessary because data that is necessary to perform the testing required to satisfy the TSD section 7.3.4 requirements were not captured, even though an entrance criteria of the test required CGE&Y to confirm that the Pseudo-CLEC was collecting all the necessary data and data elements. The issue goes beyond whether a normal CLEC would receive the same data. It was incumbent on the Pseudo-CLEC to set up a process to collect or produce the data necessary to permit CGE&Y to perform the analysis required by TSD section 7.3.4.<sup>1</sup>

The PID Matrix is no substitute for the required recalculation of MTP Appendix C PIDs using the Pseudo-CLEC data; rather, it shows the extent to which required data was not captured by the Pseudo-CLEC and the Test Administrator (“TA”). If the TA had paid attention to the requirements of the TSD earlier so that arrangements could be made to acquire the additional data from Qwest, the currently detected gap between the data required and the data available would not be nearly as large. The joint Report shows that 72% of the data elements needed to perform the required recalculations are not available to CGE&Y. The unanswered question is why the Functionality Test began without the Pseudo-CLEC being able to capture all the data needed by CGE&Y to conduct this test? The PIDs were finalized; the data within the Qwest “ad hoc” databases had been audited sufficiently that CGE&Y knew what data was used to effect the calculations. Ostensibly, CGE&Y had replicated the Qwest business rules that govern the calculation of performance results into its own computers. CGE&Y claims that the Functionality

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<sup>1</sup> TSD, §§ 3.7.4.3 (c) (3) & (4) and 7.3.4.

Test was delayed six months while it spent time verifying the accuracy of the Qwest calculations. Joint Report at 3. CGE&Y does not provide any advice on what steps it took during that time to ensure the Pseudo-CLEC had made the necessary arrangements to acquire the data needed for TSD section 7.3.4 reporting. CGE&Y certainly cannot claim HPC did not have the time to make the necessary arrangements.

The MTP required the TA to perform the recalculation on 29 of the 46 PIDs that have been agreed upon in the TAG. Of these 29, CGE&Y identifies only 3 that can be recalculated using the data that the Pseudo-CLEC captured. As a result, the other 26 measures (90%) are to be recalculated using data that the Pseudo-CLEC did not develop or receive from Qwest. AT&T can only conclude that *no* attempt was made by CGE&Y to insure that the HPC was collecting the data necessary to perform the analysis required by TSD section 7.3.4.

The CGE&Y-HPC analysis should be re-done to cure some obvious failings in the approach to endeavoring to meet the TSD requirements. The PID Matrix (Appendix B to the Joint Report) shows a reluctance on the part of the authors to use Pseudo-CLEC data unless that data has been provided by Qwest to the Pseudo-CLEC. This approach is flawed. For example, the Report states that the use of REQ TYP for reporting PO-2, PO-3, PO-4 and PO-5 is impaired because “in EDI/GUI the REQ TYP is not present on any responses from Qwest.” In fact, it is the Pseudo-CLEC that assigns the REQ TYP to the LSR. Qwest does not change the REQ TYP on LSRs submitted by CLECs. The recalculation should use REQ TYP from the submitted LSR. Similarly, the PID Matrix indicates that product reporting cannot be accomplished because “in EDI/GUI the product/USOC are not returned by Qwest in FOC, SU (EDI only) or REJ.” Again, the product/USOC is present in the LSR (the PID Matrix makes this clear), so the product/USOC data source should be the Pseudo-CLEC’s LSRs. This issue should also resolve the “N”

conditions for flow-through, rejections, cancellations, WFA completions, SOC's, desired due dates, etc.

There are items in the PID Matrix that indicate some sort of communications breakdown between CGE&Y and HPC. In the PO-8 and PO-9 analyses, HPC indicates that it can make the proper determination for LSRs were CGE&Y to provide the tracking numbers; but in other cases, it says that it cannot make the determination even if CGE&Y provides the tracking numbers. There should be no reluctance on the part of CGE&Y to provide the tracking numbers so that HPC can make the required determination about the jeopardy notices. In this same regard, the Pseudo-CLEC has all of the jeopardy notices it received, so it has the "reason for missed commitment" for PO-8 and PO-9.

The PID Matrix also shows a tendency not to consider other data sources that the Pseudo-CLEC has and which can be used to close some of the gaps. There are "N" conditions identified for ordering and provisioning measures because dispatch of technicians cannot be determined from the content of the LSR. Qwest would dispatch technicians to fulfill an order only if required and that underlying facts may not be known to the Pseudo-CLEC at the time the order is issued. However, the Pseudo-CLEC eventually learns whether or not technicians were dispatched and can use the data such as wholesale billing records to manually supplement the Pseudo-CLEC databases for the recalculation process.

The Maintenance and Repair ("M&R") measurement issues dealing with planned and unplanned troubles are unclear. Recognizing the difference between them has been accomplished (*see* CGE&Y Supporting Documentation CD-ROM FT7) and no obvious differences exist in the amount of information contained in the FT7 spreadsheet or the M&R test case file folders. Recalculations should be very straightforward, since the volume of M&R

transactions in the Functionality Test were so low. Manual entry of the required data elements from the Pseudo-CLEC files should be considered. These would include *design/non-design*, *zone*, etc.

It is unclear from the Joint Report why the Billing (BI) measures cannot be calculated from the Pseudo-CLEC data. BI-2 is noted as the only one that can be calculated according to the TSD, but in the PID Matrix, no data elements are shown for BI-1, BI-3, and BI-4 to have a data availability issue. This inconsistency should be explained.

The PID Matrix entry for the GA-1 and GA-2 PIDs is also unclear. The HP/CGE&Y Report does not square with the Data Availability entry to the PID Matrix.

Due to individual PID requirements, there are now data elements that cannot be obtained from the Pseudo-CLEC systems, files, or other records. Where PID disaggregations are impaired by the absence of Pseudo-CLEC data, AT&T recommends CGE&Y perform the recalculation using the "ad hoc" data and report the results on an aggregated level. Other situations where the data elements are missing will include, for example, such data elements as the date and time Qwest received a transaction or the time an order completion was posted to WFAC. AT&T recommends that the necessary data for these few conditions be the exceptions where the Qwest "ad hoc" databases are used to substitute for the missing Pseudo-CLEC data, with appropriate annotations for each recalculated measure that has relied on the Qwest "ad hoc" data.

AT&T recommends that the PID Matrix be re-constructed in consideration of the suggestions in these comments so that a more clear representation of the extent to which CGE&Y can satisfy TSD Section 7.3.4 is made.

Respectfully submitted this 11th day of February 2002.

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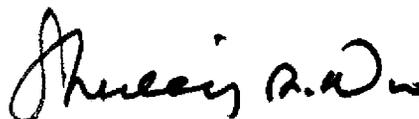
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