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ARIZONA CORPORATION COMMISSION
PHOENIX, ARIZONA

1 **LEWIS**
2 **AND**
3 **ROCA**
4 **LLP**
5 **LAWYERS**

6 **BEFORE THE ARIZONA CORPORATION COMMISSION**

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

Arizona Corporation Commission

DOCKETED

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

FEB 11 2002

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

DOCKETED BY 

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

Docket No. T-00000A-97-0238

19 **WORLDCOM, INC'S COMMENTS ON**
20 **PREORDER TO ORDER SUMMARY ORDER**

21 WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits
22 these comments on the PreOrder to Order Summary Report, Final Version, dated January
23 28, 2002, released by Hewlett-Packard Consulting ("HP"). WorldCom also reviewed the
24
25
26

1 comments filed by AT&T on this report and heard concerns raised by AT&T in the
2 workshop and concurs in those comments and AT&T's concerns.

3 **INTRODUCTION, BACKGROUND AND OBJECTIVE**

4
5 The Federal Communications Commission ("FCC") has consistently ruled that pre-
6 order to order integration is essential for competitive local exchange carriers ("CLECs") to
7 be provided a meaningful opportunity to compete. For example, in the BA/NY Order¹, it
8 states:

9
10 Integration. We find that Bell Atlantic demonstrates that its application-to-
11 application interfaces allow competing carriers to integrate pre-ordering
12 information into Bell Atlantic's ordering interface and the carriers' back office
13 systems, *a finding that is fundamental to a BOC's showing of nondiscriminatory*
14 *access to OSS.* The Commission has explained previously that *a BOC with*
15 *integrated pre-ordering and ordering functions must provide competing carriers*
16 *with access to the same capability.* In this regard, the BOC must enable competing
17 carriers to transfer pre-ordering information electronically to the BOC's ordering
18 interface or to the carriers' own back office systems, which may require "parsing"
19 pre-ordering information into identifiable fields. *Without an integrated system, a*
20 *competing carrier would be forced to re-enter pre-ordering information manually*
21 *into an ordering interface, which leads to additional costs and delays, as well as a*
22 *greater risk of error.* This lack of integration would place competitors at a
23 competitive disadvantage and significantly impact a carrier's ability to serve its
24 customers in a timely and efficient manner. (Emphasis supplied.)

19 The FCC also notes in its TX 271 order that:

20 410. . . in order to demonstrate compliance with checklist item 2,
21 the BOC must enable competing carriers to transfer pre-ordering information
22 (such as a customer's address or existing features) electronically into the
23 carrier's own back office systems and back into the BOC's ordering
24 interface. We do not simply inquire whether it is possible to transfer
25 information from pre-ordering to ordering interfaces - we assess whether the
26 BOC enables *successful* integration.

25 ¹ See, In the Matter of Application of Bell Atlantic New York for authorization under Section 271 of
26 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.

1 411. We clarify that a BOC has enabled “successful integration” if
2 competing carriers may, or have been able to, automatically populate
3 information supplied by the BOC’s pre-ordering systems onto an order form
4 (the “local service request” or “LSR”) that will not be rejected by the BOC’s
5 OSS systems.

6 As part of the Relationship Management Evaluation required under Section 7 of the
7 Master Test Plan (“MTP”), Version 4.2, dated June 29, 2001, Cap Gemini Ernst & Young
8 (“CGE&Y”) was directed to examine the processes associated with IMA and EDI
9 interface development, among other things. This evaluation was to examine the
10 documentation, specification and consultative assistance provided by Qwest to CLECs for
11 use in building an EDI interface or installing IMA. The test also included an evaluation of
12 the test environment Qwest provides CLECs for pre-testing their EDI interfaces.

13 In Section 6.5.2.3(f) of the Test Standards Document (“TSD”), CGE&Y was
14 directed to monitor and evaluate Qwest’s processes supporting CLEC interface
15 development including whether the data definitions (i.e., form, format, content,
16 usage and meaning) between pre-ordering and ordering elements enable integration
17 from pre-order transactions into order transactions without requiring translation, or
18 reconfiguration of the data elements.

19 Ultimately, HP performed the Pre-order to Order Evaluation and found that Qwest
20 is meeting the Ordering and Billing Forum Local Service Ordering Guidelines Version 3.0
21 (OBF LSOG 3) industry standard for Orders and that CLECs could use Qwest’s EDI pre-
22 order transactions to submit an Order without data manipulation.
23
24
25
26

COMMENTS

1
2 **1. HP failed to conduct necessary transaction testing**

3 HP only based its evaluation on Qwest documented business rules surrounding
4 Electronic Data Interchange (“EDI”) interface pre-order to order integration capabilities.
5 As demonstrated many times throughout the course of this test, documented business rules
6 when applied against Qwest’s Operational Support Systems (“OSS”) do not always
7 provide the same results. Therefore, the absence of transaction testing to validate Qwest’s
8 documented business rules associated with EDI pre-order to order capabilities reflects a
9 significant flaw in HP’s evaluation of Qwest’s pre-order to order integration capabilities.
10
11

12 **2. HP only evaluated LSOG, version 3**

13 The version evaluated by HP, Local Service Ordering Guide 3 (“LSOG 3”) is not
14 only behind the industry standard, but is a version of LSOG that no new entrant in Qwest’s
15 in-region territory can use because Qwest will retire this LSOG version in the very near
16 future. Moreover, Qwest has implemented and supported LSOG, version 5 (“LSOG 5”)
17 since August of 2001. Therefore, there is no evidence in the record to demonstrate that
18 Qwest’s latest version of EDI supports pre-order to order integration sufficient to provide
19 CLECs a meaningful opportunity to compete under LSOG 5.
20
21

22 **3. HP found exceptions and made adverse observations about Qwest’s**
23 **pre-order to order integration**

24 CGE&Y identified in its final report that retail pre-order to order integration is 100
25 percent, stating, “the retail systems do not separate pre-order and order functionality for
26

1 POTS service requests.”² Given this fact, it is imperative that similar pre-order to order
2 integration capabilities exist for CLECs.

3
4 HP highlighted in its evaluation that the following exceptions existed:

- 5 • The Qwest PreOrder field length is often much larger than the Order field
6 length (see Tables 4.7 through 4.5). If Pre-Order transactions returned a
7 value larger than the Order field would accept, some data manipulation
8 would be required.
- 9
10 • The EDI CFA validation required that the following data elements be
11 combined on the Order to make the CFA data element field entry: CABNM
12 (Cable Name) CFAR-12, CABTYP (Cable Type) CFAR-13, First Unit*
13 CFAR-14, Last Unit* CFAR-15, LOCA (location A) CGAR-16, and LOCZ
14 (location Z) CFAR-17. *First Unit and Last Unit is a range, the CLEC
15 selects a number between the First Unit and Last Unit for the CFA.
- 16
17 • The Account Number field requires the CLEC to append a dash and the
18 customer code value on “conversions as specified” and “conversion as is”
19 Order activities. The Customer Code (CUSTCODE CSRR-17) data element
20 is returned on the Customer Service Record Query PreOrder transaction.
21

22 The first exception addresses variable field lengths, which could have a significant
23 impact on a CLEC’s ability to mechanically populate preorder information to order. The
24

25
26 ² See, CGE&Y Final Report of the Qwest OSS Test, TSD Section 4.1 Questions, Question 3
comments, at page 228.

1 second exception identifies a critical data element that requires significant manipulation,
2 which increases the risk of error. The third exception addresses the following issues: 1)
3 the fact that CLECs are required to obtain a data field unique to Qwest and 2) manipulate
4 that information so that Qwest's internal tracking code is populated on the order. These
5 exceptions were identified during a documentation review only, thus no assessment can be
6 made as to the degree that CLECs would be impacted when performing actual pre-order
7 queries to order transactions.
8

9
10 Lastly, HP provided the following "observations" in section 6.0 of its report:

- 11 • On initial review it would appear that on average only 23.5 percent of the
12 information on an order is being provided by a PreOrder transaction.
- 13 • However, upon further observation it shows that the majority of Order data
14 elements that are not mapped to a PreOrder data element are elements whose
15 value must be provided by the CLEC or End User. Appendices B through J
16 provide the detail information for this observation.
17

18
19 A review of the Appendices noted above (B through J) provided by HP,
20 demonstrates that in addition to the 23.5 percent of the information on an order it claims
21 Qwest provides through pre-order integration, there is another 21 percent of the data
22 elements (required or conditional) which the CLEC or End User cannot provide. Thus,
23 WorldCom concludes that of the data elements Qwest could provide ($23.5 + 21 = 44.5$
24 percent) through pre-order to order integration, Qwest only provides less than 50 percent
25 of the integration data elements. Given that Qwest provides itself 100 percent integration,
26

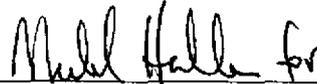
1 the 50 percent integration capabilities reflects that Qwest is not providing integrated pre-
2 ordering and ordering functions must provide competing carriers with access to the same
3 capability it does for retail orders. Therefore, this lack of meaningful integration places
4 competitors at a competitive disadvantage, significantly impacts a carrier's ability to serve
5 its customers in a timely and efficient manner, and denies CLECs nondiscriminatory
6 access to Qwest's OSS and a meaningful opportunity to compete.
7

8
9 **CONCLUSION**

10 For the reasons stated, Qwest fails to pass the pre-order to order integration
11 requirements found in the Arizona OSS Test for an EDI interface, and has, therefore,
12 failed to meet the FCC's requirements for pre-order to order integration. CLECs are
13 denied nondiscriminatory access to Qwest's OSS and a meaningful opportunity compete.
14

15 RESPECTFULLY submitted this 11th day of February, 2002.

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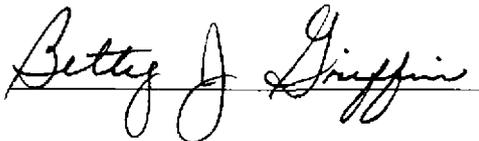
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