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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 **PID DATA ELEMENT SUMMARY REPORT**

21 WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits
22 these comments on the Cap Gemini Ernst & Young ("CGE&Y") and Hewlett- Packard
23 Consulting's ("HP") Arizona §271 Performance Indicator Definitions (PID) Data Element
24 Summary Report ("PID Data Report"), Version 1.0 dated January 18, 2002. WorldCom
25
26

1 also reviewed the comments filed by AT&T on this report and heard the concerns raised
2 by AT&T in the workshop when this report was discussed and concurs in those comments
3 and AT&T's concerns.
4

5 INTRODUCTION, BACKGROUND AND OBJECTIVE

6 Background

7 Under Section 8 of the Master Test Plan ("MTP"), Version 4.2, dated June 29,
8 2001, CGE&Y was and is required to conduct a Performance Measurement Evaluation
9 that is designed to provide the Arizona Corporation Commission ("ACC") with a
10 statistically valid assessment of Qwest's performance in providing service to the
11 competitive local exchange carriers ("CLECs") based on established performance
12 measures. The performance measurements define those standards set by the ACC that
13 Qwest must meet in order to comply with Section 271 of the Act. For purposes of this
14 test, those standard are found in the Performance Indicator Definitions, version 6.3 ("PID
15 6.3").
16
17

18 More particularly, in Section 8.5.3 of the MTP, it is stated:
19

20 During Functionality Testing and Capacity Testing, Qwest will provide
21 appropriate performance measure data and results. The Test Administrator
22 will verify such data and incorporate the results into the Functionality
23 Testing and Capacity Testing. The Test Administrator will acquire and/or
develop data, calculate Functionality and Capacity test results, and validate
results of Qwest, Pseudo-CLEC and CLEC analyses.

24 Appendix C of the MTP lists the performance measurements and indicates
25 which of those measurements would be included in the Functionality Test. A subset
26

1 of those measurements was also to be evaluated during the Performance
2 Measurement Evaluation to verify that Qwest was and is collecting adequate data
3 and computing accurate results.
4

5 Section 7.3.4 of the TSD provides in pertinent part:

6 During the Functionality Tests, Performance Measurement raw data for the
7 Pseudo-CLEC test orders, trouble reports and other transactions, calculated z
8 statistics and other calculations will be collected from Qwest for all those
9 measurement with a "Yes" indication in the MTP Appendix C. Using the
10 raw data (before exclusions) from Qwest, the TA will perform an
11 independent calculation of all measurements with a "Yes" indication in the
12 MTP Appendix C and will also perform an independent calculation of the
13 same measurements for the same orders using the Functionality Test Data
14 provided by the Pseudo-CLEC.

15 The TA will compare Qwest's computed z statistics and other calculations to
16 TA computed z statistics and other calculations (from Qwest's provided raw
17 data) and to TA computed z statistics (from Functionality Test Data
18 collected by the Pseudo-CLEC). Discrepancies in the calculations will be
19 evaluated, documented and reported by the TA.

20 The purpose of the TSD requirement is to determine whether Qwest's adhoc dataset
21 contains all records submitted by the Pseudo-CLEC and only those records and to
22 determine whether the data elements captured by Qwest's source systems used to calculate
23 these performance measures are actually what is experienced and could be recorded by a
24 CLEC.

25 **Objective**

26 CGE&Y failed to perform the required testing to "perform an independent
calculation of the same measurements for the same orders using the Functionality Test
Data provided by the Pseudo-CLEC." Instead this report shows the high percentage of

1 data that was not properly captured by the pseudo-CLEC, and therefore, CGE&Y had to
2 substitute Qwest adhoc data for non-existent Pseudo-CLEC data. As stated in Section 1.1
3 of the PID Data Report, Qwest does not provide to CLECs, including the Pseudo-CLEC,
4 all of the data elements necessary to allow them to reproduce results Qwest obtains when
5 it calculates PID 6.3 measurements. Moreover, CLECs cannot independently gather all
6 data elements necessary to reproduce results defined by PID 6.3.
7

8 The method selected by CGE&Y to independently calculate the relevant
9 measurements raised questions from the Arizona Test Advisory Group (“TAG”) and
10 CLECs concerning why the PID measures could not be calculated from the Pseudo-CLEC
11 test data. CGE&Y asserts that the PID Data Report is intended to satisfy the TAG request
12 for detailed information on all data elements required to produce performance
13 measurement results in compliance with the Arizona PID 6.3. In addition, the second part
14 of Staff’s request is to identify which of these elements are not available to a CLEC.
15 The substitution of Qwest adhoc data does not meet the requirements outlined in the TSD
16 Section 7.3.4. More attention on the part of the test administrator should have been given
17 to the TSD requirements to gather the additional data and information needed when
18 conducting the functionality test instead of relying on Qwest adhoc data.
19
20
21

22 COMMENTS

23 To meet the requirements of the MTP and the TSD, CGE&Y should have relied
24 upon Pseudo-CLEC data. Instead, CGE&Y used Qwest adhoc data and decided to
25 “calculate the PID compliant measures using the Qwest adhoc data and to replace data
26

1 elements in the adhoc data with the discrepant Pseudo-CLEC data element and recalculate
2 the measure.”

3
4 The purpose of the PID Data Report was to “produce a more complete matrix
5 containing all data elements that are required to produce PID compliant disaggregated
6 results and specifically note which elements are not provided by Qwest to the CLEC or
7 independently gathered by the CLEC.” It is clear from the reported results that a
8 significant amount of data elements used Qwest’s adhoc data instead of relying upon the
9 Pseudo-CLEC data to re-calculate the results. Column 7 of the report is titled “Pseudo-
10 CLEC Data Available Y/N.” It is WorldCom’s understanding that the “Y” indicates that
11 the data elements are available and that the “N” reflects that the data elements were not
12 available and that column 8 titled “HP/CGE&Y Comments” then reflects what portion of
13 the data was not available. There are about 200 “No’s” in column 8 indicating that a
14 significant portion of the data was not available. It further appears that the only measures
15 that were able to be independently and completely calculated using the Pseudo-CLEC
16 functionality test data were BI and GA measures.

17
18
19
20 When CGE&Y/HP determined that there were no data elements available or
21 where portions only contained the required field, could other data that was captured have
22 been substituted or could information retrieved from the LSR that the Pseudo-CLEC
23 submitted be used to calculate the results without using Qwest’s adhoc data?

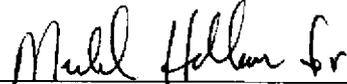
24
25 Apparently, CGE&Y and HP did not determine whether any other Pseudo-
26 CLEC captured data could have been substituted for the Qwest adhoc data or if additional

1 data could have been retrieved from the information on the LSR that the Pseudo-CLEC
2 submitted. Because CGE&Y/HP did not use surrogate data from the Pseudo-CLEC, and
3 instead relied upon Qwest's adhoc data, a significant amount of Qwest adhoc data was
4 used to re-calculate the PID results. The purpose of the independent evaluation by
5 CGE&Y was to use Pseudo-CLEC data and not have to depend on Qwest adhoc data to
6 compare the results.
7

8 Accordingly, CGE&Y failed to perform an adequate independent calculation of all
9 measurements indicated in Appendix C of the MTP for the aggregate CLECs, and Qwest
10 retail using Qwest raw data according to the statistical approach outlined in Section 9 of
11 the TSD, and CGE&Y failed to perform an adequate independent calculation of all
12 measurement indicated in Appendix C of the MTP for the Pseudo-CLEC according to the
13 statistical approach outlined in Section 9 of the TSD.
14
15

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

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9 COPY of the foregoing hand-
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