

ORIGINAL



0000105436

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

WILLIAM A. MUNDELL
Chairman
JAMES M. IRVIN
Commissioner
MARC SPITZER
Commissioner

2002 MAR -6 P 3:31

AZ CORP COMMISSION
DOCUMENT CONTROL

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 HPC'S PROPOSED
SCOPE FOR REVIEW OF QWEST
LSOG 5 & EDI PRE-ORDER TO
ORDER INTEGRATION
ANALYSIS

Qwest Corporation (Qwest) hereby submits its Comments to HPC's Proposed Scope for Review of Qwest LSOG 5 Review & EDI PreOrder to Order Integration Analysis, draft version 1.1, released February 24, 2002.

As an initial matter, it is Qwest's understanding, based on the discussion of HPC's proposal in the additional workshop on February 25, 2002, that the Arizona Corporation Commission Staff requested HPC to analyze Qwest's IMA Release 9.0. However, HPC's proposal refers to Release 8.0. Qwest believes that this is an oversight and that HPC's proposal in fact addresses release 9.0.

More importantly, the CLECs requested in the February 25, 2002 workshop that HPC expand the scope of the integration analysis by issuing transactions to demonstrate the integrateability of preorder information to order. This request is not supported by the requirements in the Master Test Plan (MTP) or Test Standards Document (TSD) and should be rejected.

Arizona Corporation Commission
DOCKETED

MAR 06 2002

DOCKETED BY	<i>nee</i>
-------------	------------

The MTP and TSD provisions that describe the integration analysis clearly provide that analysis as a process test based on Qwest's documentation, rather than a transactional test. Section 7.1 of the MTP plainly states that the "Relationship Management Evaluation is a 'process test.'"¹ Section 7.2 of the MTP further clarifies:

"The Relationship Management Evaluation will examine the processes associated with the business relationships between Qwest and the CLEC community. Five business operations areas will be evaluated: CLEC Account Establishment, CLEC Account Management, EDI and IMA Interface Development, and Qwest OSS Co-provider Industry Change Management Process (CICPM)."²

The TSD further specifies that the integration analysis is part of the Interface Development section of Relationship Management Evaluation. Specifically, Section 6.5.2.2 of the TSD states:

"The Qwest Interface Development Process documentation will be reviewed and evaluated by the Pseudo-CLEC and Test Administrator. . . The ordering requirements will be evaluated to assess the extent to which information that Qwest supplies in it's [sic] pre-ordering information can be integrated into the ordering transaction by CLECs."³

The key inquiry to be addressed by the integration analysis is set forth in Section 6.5.2.3:

"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."⁴

This inquiry plainly requires that the integration analysis must be based upon a review of the data definitions in Qwest's documentation.

The provisions of the MTP and TSD thus plainly provide that integration analysis is to be based upon a review of Qwest's documentation and was never intended to be a

¹ Master Test Plan (MTP), version 4.2, dated June 29, 2001, at 43.

² *Id.* at 44 (emphasis added).

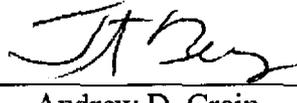
³ Test Standards Document, version 2.10, dated September 6, 2001, at 6-14.

⁴ *Ibid.*

transactional test. Because the CLECs' request is contrary to the MTP and TSD requirements, it should be rejected.

Respectfully submitted this 6th day of March 2002.

Qwest Corporation

By: 

Andrew D. Crain
1801 California Street, Suite 4900
Denver, CO 80202
(303) 672-2926

FENNEMORE CRAIG, P.C.
Timothy Berg
Theresa Dwyer
3003 North Central Ave., Suite 2600
Phoenix, AZ 85012
(602) 916-5421

Attorneys for Qwest Corporation

**ORIGINAL +10 copies filed this 6th day
of March, 2002, with:**

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, AZ

COPY of the foregoing delivered this day to:

Maureen A. Scott
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Ernest Johnson, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Lyn Farmer, Chief Administrative Law Judge
Jane Rodda, Administrative Law Judge
Hearing Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ 85007

Caroline Butler
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

COPY of the foregoing mailed this day to:

Eric S. Heath
SPRINT COMMUNICATIONS CO.
100 Spear Street, Suite 930
San Francisco, CA 94105

Thomas Campbell
LEWIS & ROCA
40 N. Central Avenue
Phoenix, AZ 85004

Joan S. Burke
OSBORN MALEDON, P.A.
2929 N. Central Ave., 21st Floor
PO Box 36379
Phoenix, AZ 85067-6379

Thomas F. Dixon
WORLD COM, INC.
707 N. 17th Street #3900
Denver, CO 80202

Scott S. Wakefield
RUCO
2828 N. Central Ave., Ste. 1200
Phoenix, AZ 85004

Michael M. Grant
Todd C. Wiley
GALLAGHER & KENNEDY
2575 E. Camelback Road
Phoenix, AZ 85016-9225

Michael Patten
ROSHKA, HEYMAN & DEWULF
400 E. Van Buren, Ste. 900
Phoenix, AZ 85004-3906

Bradley S. Carroll
COX COMMUNICATIONS
20402 North 29th Avenue
Phoenix, AZ 85027-3148

Daniel Waggoner
DAVIS, WRIGHT & TREMAINE
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101

Traci Grundon
DAVIS, WRIGHT & TREMAINE
1300 S.W. Fifth Avenue
Portland, OR 97201

Richard S. Wolters
Maria Arias-Chapleau
AT&T Law Department
1875 Lawrence Street, #1575
Denver, CO 80202

Gregory Hoffman
AT&T
795 Folsom Street, Room 2159
San Francisco, CA 94107-1243

David Kaufman
E.SPIRE COMMUNICATIONS, INC.
343 W. Manhattan Street
Santa Fe, NM 87501

Alaine Miller
XO COMMUNICATIONS, INC.
500 108th Ave. NE, Ste. 2200
Bellevue, WA 98004

Diane Bacon, Legislative Director
COMMUNICATIONS WORKERS OF AMERICA
5818 N. 7th St., Ste. 206
Phoenix, AZ 85014-5811

Philip A. Doherty
545 S. Prospect Street, Ste. 22
Burlington, VT

W. Hagood Bellinger
5312 Trowbridge Drive
Dunwoody, GA 30338

Joyce Hundley
U.S. DEPARTMENT OF JUSTICE
Antitrust Division
1401 H Street N.W. #8000
Washington, DC 20530

Andrew O. Isar
TELECOMMUNICATIONS RESELLERS ASSOC.
4312 92nd Avenue, NW
Gig Harbor, WA 98335

Raymond S. Heyman
ROSHKA, HEYMAN & DEWULF
400 N. Van Buren, Ste. 800
Phoenix, AZ 85004-3906

Thomas L. Mumaw
SNELL & WILMER
One Arizona Center
Phoenix, AZ 85004-0001

Charles Kallenbach
AMERICAN COMMUNICATIONS SVCS, INC.
131 National Business Parkway
Annapolis Junction, MD 20701

Gena Doyscher
GLOBAL CROSSING SERVICES, INC.
1221 Nicollet Mall
Minneapolis, MN 55403-2420

Andrea Harris, Senior Manager
ALLEGIANCE TELECOM INC OF ARIZONA
2101 Webster, Ste. 1580
Oakland, CA 94612

Gary L. Lane, Esq.
6902 East 1st Street, Suite 201
Scottsdale, AZ 85251

Kevin Chapman
SBC TELECOM, INC.
300 Convent Street, Room 13-Q-40
San Antonio, TX 78205

M. Andrew Andrade
TESS COMMUNICATIONS, INC.
5261 S. Quebec Street, Ste. 150
Greenwood Village, CO 80111

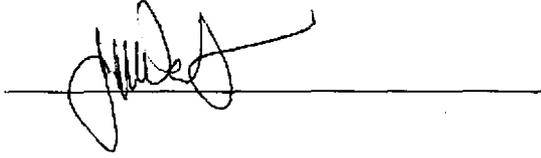
Richard Sampson
Z-TEL COMMUNICATIONS, INC.
601 S. Harbour Island, Ste. 220
Tampa, FL 33602

Megan Doberneck
COVAD COMMUNICATIONS COMPANY
7901 Lowry Boulevard
Denver, CO 80230

Richard P. Kolb
Vice President of Regulatory Affairs
ONE POINT COMMUNICATIONS
Two Conway Park
150 Field Drive, Ste. 300
Lake Forest, IL 60045

Janet Napolitano, Attorney General
OFFICE OF THE ATTORNEY GENERAL
1275 West Washington
Phoenix, AZ 85007

Steven J. Duffy
RIDGE & ISAACSON, P.C.
3101 North Central Ave., Ste. 1090
Phoenix, AZ 85012

A handwritten signature in black ink, appearing to read "S. Duffy", is written over a solid horizontal line. The signature is stylized and cursive.