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AT&T COMMUNICATIONS  
CONTROL

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

**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 CGE&Y'S  
CMP REDESIGN EVALUATION  
REPORT**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T") hereby file their comments on Cap Gemini Telecom Media & Networks U.S., Inc.'s Arizona Corporation Commission ("CGE&Y") Qwest Change Management Process Redesign Evaluation Report, Draft Final Report, version 1.0, dated February 21, 2002 ("Report").

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**I. INTRODUCTION**

The purpose of CGE&Y's Report is to report on its observations of the efforts expended by Qwest Corporation ("Qwest") to redesign and implement its Change Management Process ("CMP"). AT&T submits these comments to highlight the fact that, while this Report is consistent with CGE&Y's stated objectives, it fails to answer the question of the adequacy of the process, and whether Qwest routinely and reliably executes that process. AT&T explains that either CGE&Y fails to understand its obligations or has chosen to narrow its interpretation of its obligations under the test's controlling documents, leaving the Commission with unanswered questions on the extent to which competitive local exchange carriers ("CLECs") have access to a

fair and reliable process with which to interact with Qwest on the issues of effecting changes to Qwest's operations support systems ("OSS").

## II. COMMENTS

The Report is limited to CGE&Y's assessment of the work that has gone on to redesign and implement the Qwest CMP to date. It does not answer fundamental questions established in the controlling test documents.<sup>1</sup> The Report also fails to provide CGE&Y's opinion as to the competency of the process as reflected in the Federal Communications Commission's ("FCC") orders in proceedings that have resulted in successful applications under section 271.

### **A. The Controlling Documents Are Appropriately Written But Inappropriately Interpreted by CGE&Y**

The requirements for CGE&Y to conduct an evaluation and provide its report of the adequacy of the Qwest Change Management Process are reflected in the MTP and the TSD. These requirements parallel one another, whereas the MTP identifies the nature of the tests to be conducted and the TSD identifies more of the "how to" aspects of the tests. CGE&Y misreads these requirements when it claims that it conducted limited testing because "[t]hese documents only refer to Qwest's CMP in terms of changes to *OSS functionality* and the notification of those changes." *Report at 3* (emphasis in original).

AT&T believes the controlling documents instruct CGE&Y to conduct testing of the Qwest OSS CMP to determine whether 1) that process exists in a documented form; 2) it is a competent process; and 3) Qwest's ongoing use of the process is consistent with the documentation. Well-formed documentation would establish the scope of business and technical matters that it addresses. In fact, if the CMP documentation had no practical limitations, that

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<sup>1</sup> Master Test Plan, version 4.2, dated June 29, 2001 ("MTP") and Test Standards Document, version 2.10, dated September 26, 2001 ("TSD").

would be a significant deficiency, as Qwest and the CLECs would have obvious disagreements over what is “in process” and what is “out of process.” Nowhere does the CGE&Y-imposed limitation exist -- that its obligations are to evaluate only the aspects of the CMP that deal with “*OSS functionality* and the notification of those changes.” *Id.* Absent a CGE&Y definition of the extent of that limitation, AT&T assumes that CGE&Y focused on the OSS interfaces and the functions that they perform. This is an improper construction on its part. OSS is not merely the interfaces through which CLECs submit transactions and receive responses. Were that to be so, a third-party test of Qwest OSS would be limited to tests of only the transactions through those interfaces. Clearly, OSS change management has depth and breadth equivalent to the reach of the third-party test, specifically, the OSS interfaces, systems, processes, procedures, and operations through which CLECs interoperate with Qwest. To read this obligation more narrowly is inappropriate.

CGE&Y wants to read the MTP and TSD, “for the most part, [to] only require CGE&Y

[t]o make findings with respect to whether Qwest publishes its CMP processes, procedures, terminology, roles and responsibilities, and systems release schedules, and whether Qwest follows those processes.” *Id.*

It is true that these CMP functions are to be evaluated, but it is wrong to maintain that they are the general focus of the assignments. If the existence of the documented process is not the first step of evaluation, it makes no sense to determine whether Qwest follows the process step. Also, if the evaluation of the competency, relevance, and practicality of the process, as documented, is not made, it similarly would make no sense to insist that Qwest follow those processes – published or not.

## **B. CGE&Y's Incident Work Orders Indicate Some Process Testing Was Conducted**

CGE&Y relies on its issuance of IWOs based on the "retired" Qwest process as evidence that it conducted evaluations of the prior process, but fails to identify exactly why it did not evaluate the new process as it was unfolding. However, it points out that the test documents narrowed the focus of the tasks assigned to it for these test steps. *Id.* CGE&Y's remark on its expanding the scope of the MTP and the TSD to a review of general adequacy of the CMP misses the point of the evaluations that it was to perform. Its claim that process deficiencies that it found were beyond the scope of the TSD and MTP simply is wrong. It was obligated, by the relevant provisions of these documents, to thoroughly review the CMP process documentation and determine whether that documentation reflected a process that was well-organized, consistently practiced, and whether that process provides CLECs with notice about impending changes and with access to a system with which to effect change. If it had done this testing on the basis of the prior process, many more IWOs than the three it cites would have been issued.

## **C. CGE&Y's Comments on the Current State of the Redesign Process are Inadequate**

Qwest has been providing status reports on a periodic basis on the progress being made to redesign the CMP. It provided status reports in November, January and February, and the CLECs' responsive comments serve to provide the CLECs' perspective on the redesign and implementation progress and issues. Section 3 of the Report does not refer to any information or comments that were submitted by the parties in their comments on Qwest's status reports.<sup>2</sup> Section 3 fails to provide a balanced view of the CLECs' perspective of the redesign and the

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<sup>2</sup> CLECs have filed extensive comments on the CMP redesign. CLECs filed comments as late as February 19, 2002, on the status of the redesign process. The Report was released on February 21, 2002. AT&T believes the Report should not have been released until CGE&Y had ample opportunity to review and reflect the CLECs' comments.

progress being made in the redesign meetings. Section 3 needs to be revised to incorporate fully the CLECs' written comments and informal, oral interviews

### III. CONCLUSION

CGE&Y's Report does not address the substantial issues of the overall adequacy of the Qwest CMP, despite clear and unequivocal requirements to do so as directed in the MTP and the TSD. In the case that the Commission wants CGE&Y to complete the appropriate testing of the Qwest CMP, it should instruct CGE&Y to review the CMP consistent with the MTP, TSD and FCC requirements and provide a report that advises the Commission appropriately. The Commission also should import the results of the ROC test of CMP and monitor the progress being made to resolve KPMG-issued Observations and Exceptions that indicate the failings of Qwest's CMP.

Respectfully submitted this 5<sup>th</sup> day of March 2002.

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I hereby certify that the original and 10 copies of **AT&T's Comments on CGE&Y's CMP Redesign Evaluation Report**, Docket No. T-00000A-97-0238 were sent by overnight delivery on March 5, 2002 to:

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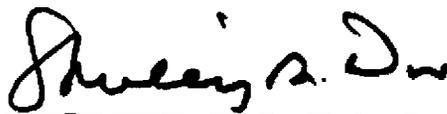
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