



BEFORE THE AR

0000105442

ORIGINAL

SION RECEIVED

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

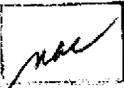
Arizona Corporation Commission

DOCKETED

MAR 0 2002

2002 MAR -4 P 12: 04

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY 

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

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T") hereby submit their Comments on the HPC Proposed Scope for Review of Qwest LSOG 5 Review & EDI PreOrder to Order Integration Analysis, draft version 1.1, released February 24, 2002.

In the follow-up Draft Final Report workshop held on February 25, 2002, Hewlett-Packard Consulting ("HPC") made a short presentation outlining its proposal to the Arizona Corporation Commission for a review of the integrateability of the Qwest EDI pre-ordering and ordering functions. AT&T understands integrateability for the purposes of the proposed evaluation to mean the extent to which the

EDI interfaces contain the requisite data in the pre-order query responses and the ordering transactions that allow CLECs to use the response data to format the resulting order. If the data is available for insertion into the order, does it require transformation to meet the ordering specifications?¹

¹ AT&T Exhibit 9-2 at 2.

The HPC proposal is to utilize Qwest's pre-order and ordering documentation and specifications for the IMA Release 8 interfaces which Qwest says are consistent with LSOG 5 guidelines as published by the Ordering and Billing Forum ("OBF) of the Association for Telecommunications Industry Solutions ("ATIS"). AT&T disagrees with this approach, as it will not provide an analysis of the integrateability of the most recent, and logically most extensive, deployment of pre-order and order interfaces that are built upon LSOG 5 standards. In AT&T Exhibit 9-2, AT&T recommends, "that Staff engage HPC to conduct the EDI integrateability evaluation on the basis of Qwest IMA Release 9."² In the workshop, Qwest also recommended that the HP evaluation be conducted on the basis of Release 9.

The HPC proposal provides for an examination of nine (9) order types for five (5) specific products in the Assumptions section. While this is a limited set of transactions, AT&T believes these are frequently experienced order types and does not disagree with them as the proper basis for this limited evaluation of integrateability. AT&T does not agree that the HPC report, when published, would attest to the overall integrateability of the Qwest EDI interfaces as is called for in the Test Standards Document ("TSD"),³ but rather would be a report on the integrateability of the activity type/products evaluated by HPC.

The HPC proposal advises:

The analysis will assess the ability of a CLEC to use Qwest data via EDI Release 8.0 (LSOG 5), as it is received in a PreOrder response, in order to submit a Local Service Request, hereafter referred to as an Order, without having to manipulate the Pre-Order data.

AT&T understands that HPC will perform its analysis on the basis of Qwest and OBF documentation and will not actually submit the Local Service Request ("LSR") that would be

² *Id.* at 9

³ TSD, Sections 3.1, 6.1.4, 6.5.2.2, and 6.5.2.3

produced as a result of the integration of actual data from actual pre-ordering query results. This is disappointing, as noted in AT&T Exhibit 9-2, where AT&T points out the shortcoming in the previous analysis of LSOG 3 integrateability.

HPC should have actually submitted LSRs that were formed from the model of integration that it constructed to determine if those LSRs could be processed by Qwest.

While Staff indicated in the workshop that the steps necessary for HPC to prepare for such submission of test orders would be excessive, there is no data that supports that position. It is unclear whether the certification processes could be done in parallel with the integrateability analysis or that the test order submissions would add any significant amount of time to the engagement at hand. AT&T believes that HPC's experience in working with the Qwest interfaces in Arizona are extensive. Its experience in ROC testing later releases of the IMA system and its experience in evaluating SATE might permit HPC to be readily certified and ready to submit test transactions reflecting the actual integrateability of the pre-order and ordering interfaces.

HPC's approach statements (Section 2) do not clearly indicate the extent to which it will utilize all of the Network Disclosures and Disclosure Addenda that Qwest has provided or will provide during the course of this engagement that have impact on pre-ordering and ordering transactions that are within the scope of the analysis. Perhaps it is implicit within the Approach section of its proposal, but it should be made clear whether HPC will rely only on the chapters cited in Section 1.5 relating to the Developer Work Sheets, or whether it will also evaluate the modifications via Disclosure Addenda to the IMA release documentation. AT&T believes the Disclosure Addenda, if any, that are published during the course of HPC's work under this engagement should be included within the analysis.

HPC proposes to “assess the ability of a CLEC to build an EDI PreOrder to Order interface that takes a CSR response transaction and then parse (sic) it for use in an LSR.” *Proposal at Section 2.0.* AT&T recommends that HPC and the Staff come to a common and public understanding of what is meant by parsing of the response transaction for use in an LSR. AT&T believes that the proper scope of the parsing analysis should be that HPC use Qwest’s published parsing business rules to build a parsing process (*i. e.*, pseudo-code) that selects specific data elements from within the CSR response and populates the order data elements according to Qwest’s I-charts. By way of example, using a hypothetical case, for a conversion order, Qwest’s business rules could state that the listed name is the first entry in the List section of the CSR record and it is comprised of an LN field containing the end-user specified listing name, unless the entry is NP or NL. The parsing pseudo-code should be processed and the results from all LN entries should correspond with acceptable (*i.e.*, non-rejected) and correct (*i.e.*, according to the existing listing) order entries. CSR data that cannot be parsed to satisfy ordering requirements for the selected order types must be flagged as exceptions.

In HPC’s Approach section there is a paragraph that appears to be jumbled from editing to the point that it detracts from the usability of the section.

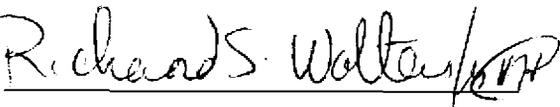
HPC mapped the PreOrder data elements to Order data elements and noted any data definition (*i.e.*, form, format, content, usage, and meaning) issues that were identified during this step. HPC will process Pre-Order transactions and populate the returned Qwest information into LSRs this will confirm the mapping of data elements.

In AT&T Exhibit 9-2, AT&T raised its concerns that HPC requested Qwest’s review of its initial analysis. “Qwest should not be allowed to review HPC’s work any earlier than any other party.” *AT&T Exhibit 9-2 at 9.* AT&T makes this same recommendation for the purposes of this evaluation.

In the workshop, HPC stated that the integrateability engagement is estimated to require three (3) weeks of work, including report preparation activities. In the case that this estimate is found to be too conservative, AT&T recommends that HPC identify the reasons that its work is taking longer than expected and that the Staff make it clear that HPC is under no obligation to meet an arbitrary delivery date in order for HPC to perform its analysis and reporting according to its professional standards.

Respectfully submitted this 1st day of March 2002.

**AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.,
AND TCG PHOENIX**

By: Richard S. Wolters 

Richard S. Wolters
AT&T
1875 Lawrence Street, Suite 1503
Denver, Colorado 80202
(303) 298-6741
(303) 298-6301 Fax
rwolters@att.com

Gregory H. Hoffman
AT&T
795 Folsom Street, Suite 2161
San Francisco, CA 94107-1243
(415) 442-3776
(415) 977-6234 Fax
ghoffman@att.com

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T's Comments on the HPC Proposed Scope for Review of Qwest LSOG 5 & EDI Pre-Order to Order Integration Analysis**, Docket No. T-00000A-97-0238 were sent by overnight delivery on March 1, 2002 to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and a true and correct copy was sent by overnight delivery on March 1, 2002 to:

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Mark A. DiNunzio
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Ernest Johnson
Director - Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Christopher Kempley
Arizona Corporation Commission
Legal Division
1200 West Washington Street
Phoenix, AZ 85007

Jane Rodda
Administrative Law Judge
Arizona Corporation Commission
400 West Congress
Tucson, AZ 85701-1347

and a true and correct copy was sent by U. S. Mail on March 1, 2002 to:

Thomas F. Dixon
WorldCom, Inc.
707 – 17th Street, #3900
Denver, CO 80202

Terry Tan
WorldCom, Inc.
201 Spear Street, 9th Floor
San Francisco, CA 94015

K. Megan Doberneck
Covad Communications Company
7901 Lowry Blvd.
Denver, CO 80230

Bradley Carroll
Cox Arizona Telcom, L.L.C.
20401 North 29th Avenue
Phoenix, AZ 85027-3148

Michael M. Grant
Gallagher and Kennedy
2575 East Camelback Road
Phoenix, AZ 85016-9225

Gena Doyscher
Global Crossing Local Services, Inc.
1221 Nicollet Mall, Suite 300
Minneapolis MN 55403

Traci Kirkpatrick
Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue
Portland, OR 97201

Michael W. Patten
Roshka Heyman & DeWulf, PLC
400 North Fifth Street, Suite 1000
Phoenix, AZ 85004-3906

Joyce Hundley
United States Dept. of Justice
Antitrust Division
1401 H Street NW, Suite 8000
Washington, DC 20530

Daniel Pozefsky
Residential Utility Consumer Office
2828 North Central Ave., #1200
Phoenix, AZ 85004

Mark N. Rogers
Excell Agent Services, L.L.C.
2175 W. 14th Street
Tempe, AZ 85281

Mark P. Trinchero
Davis Wright Tremaine
1300 SW Fifth Ave., Suite 2300
Portland OR 97201-5682

Penny Bewick
New Edge Networks
3000 Columbia House Blvd., Suite 106
Vancouver, WA 98661

Andrea P. Harris
Senior Manager, Regulatory
Allegiance Telecom, Inc.
2101 Webster, Suite 1580
Oakland, CA 94612

Karen L. Clauson
Eschelon Telecom, Inc.
730 2nd Avenue South, Suite 1200
Minneapolis, MN 55402

Joan S. Burke
Osborn Maledon, P.A.
2929 N. Central Avenue, 21st Floor
Phoenix, AZ 85067-6379

Eric S. Heath
Sprint Communications Company L.P.
100 Spear Street, Suite 930
San Francisco, CA 94105

Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Annapolis Junction, MD 20701

Jeffrey W. Crockett
Snell & Wilmer, LLP
One Arizona Center
Phoenix, AZ 85004-0001

Todd C. Wiley
Gallagher & Kennedy, P.A.
2575 East Camelback Road
Phoenix, AZ 85016-9225

Michael B. Hazzard
Kelley, Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036

Andrew Crain
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202

Daniel Waggoner
Davis Wright Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688

Janet Livengood
Regional Vice President
Z-Tel Communications, Inc.
601 S. Harbour Island Blvd., Suite 220
Tampa, FL 33602

Timothy Berg
Fennemore Craig, P.C.
3003 North Central Ave., #2600
Phoenix, AZ 85012

Charles W. Steese
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202

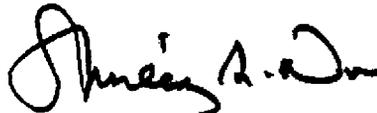
Raymond S. Heyman
Randall H. Warner
Roshka Heyman & DeWulf
Two Arizona Center
400 N. Fifth Street, Suite 1000
Phoenix, AZ 85004

Bill Haas
Richard Lipman
McLeodUSA Telecommunications
Services, Inc.
6400 C Street SW
Cedar Rapids, IA 54206-3177

Diane Bacon, Legislative Director
Communications Workers of America
Arizona State Council
District 7 AFL-CIO, CLC
5818 N. 7th Street, Suite 206
Phoenix, AZ 85014-5811

Brian Thomas
Vice President – Regulatory
Time Warner Telecom, Inc.
520 S.W. 6th Avenue, Suite 300
Portland, OR 97204

Executed on March 1, 2002 in San Francisco, California.



Shirley S. Woo