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March 8, 2002

VIA UPS OVERNIGHT DELIVERY

Arizona Corporation Commission
Utilities Division
1200 West Washington
Phoenix, Arizona 85007

Re: *Arizona 271 Docket no. T-00000A-97-0238*

Dear Sir or Madam:

Enclosed for filing in the above referenced docket is the **COMMENTS ON AT&T'S LIST OF PRIORITY CMP ISSUES**. The original and ten copies are enclosed.

Please contact me at 720-208-3354 with any questions concerning this filing.
Thank you.

Sincerely,

Adrienne M. Anderson
Senior Paralegal

Enclosures

Arizona Corporation Commission
DOCKETED

MAR 12 2002

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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

AZ CORP COMMISSION
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IN THE MATTER OF THE)
INVESTIGATION INTO)
US WEST COMMUNICATION,) DOCKET NO. T-00000A-97-0238
INC.'S COMPLIANCE WITH)
THE § 271 OF THE)
TELECOMMUNICATIONS ACT)
OF 1996)

**COVAD COMMUNICATIONS COMPANY'S COMMENTS ON AT&T'S LIST
OF PRIORITY CMP ISSUES**

Covad Communications Company ("Covad") respectfully submits these Comments on AT&T's List of Priority CMP Issues (the "AT&T List").

Covad concurs in the list of issues identified by AT&T as requiring resolution before Qwest's change management process may be found compliant with Section 271 of the Telecommunications Act of 1996. Covad believes, however, that there is a need for clarification as to the scope of one issue on the AT&T List, and for the addition of one item thereto.

Clarification of Scope of Issue. In its List, AT&T identified the issue of "[w]hat changes are CLEC impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected?" AT&T List, p. 7, subpoint (c).

Covad agrees that this is an issue requiring resolution before Section 271 relief may be given, but clarifies that it believes this issue must be addressed in terms of (1) product, process and systems changes that are CLEC-impacting, and (2) retail changes that may be CLEC-impacting.

Additional Issue. In addition to the issues identified by AT&T, Covad believes that an exception process must be agreed upon and included in the parties' Master Redlined CLEC-Qwest CMP Redesign Framework Interim Draft (*i.e.*, the "CMP contract"). Currently, while the parties have agreed in principle on the method and use of an exception process in connection with the CMP, that agreement is not reflected in the master redlined document. Accordingly, while this remains an issue to be resolved, Covad believes it is non-controversial and can be quickly and easily accomplished by the parties.

Dated this 8th day of March, 2002.

Respectfully submitted,

COVAD COMMUNICATIONS COMPANY

By:



K. Megan Doberneck
Senior Counsel
7901 Lowry Boulevard
Denver, Colorado 80230
720-208-3636
720-208-3256 (facsimile)
e-mail: mdoberne@covad.com

CERTIFICATE OF SERVICE

I, Adrienne Anderson, hereby certify that an original and ten (10) copies of the foregoing *Covad Communications Company's Comments on AT&T's List of Priority CMP Issues*, Docket No. T-00000A-97-0238, were filed on this 8th day of 2002, to the following:

Arizona Corporation Commission
Docket Control-Utilities Division
1200 West Washington Street
Phoenix, AZ 85007-2996

and a true and correct copy of was served via hand delivery and overnight delivery this 8th day of March, 2002, on the following:

Hearing Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

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

Matt Rowell
Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

Phil Doherty
545 South Prospect Street, Suite 22
Burlington, VT 05401

W. Hagood Bellinger
5312 Trowbridge Drive
Dunwoody, GA 30338

Andrew Crain
Qwest Corporation
1801 California Street, Suite 5100
Denver, Colorado 80202

and a true and correct copy was sent via electronic mail; on this 8th day of March, 2002, to the following:

Mark Dioguardi TIFFANY AND BOSCO PA 500 Dial Tower 1850 N. Central Avenue Phoenix, Arizona 85004	Nigel Bates ELECTRIC LIGHTWAVE, INC. 4400 NE 77 th Avenue Vancouver, Washington 98662	Thomas L. Mumaw Jeffrey W. Crockett SNELL & WILMER One Arizona Center Phoenix, Arizona 85004-0001
Darren S. Weingard Stephen H. Kukta SPRINT COMMUNICATIONS CO 1850 Gateway Dr., 7 th Floor San Mateo, CA 94404-2467	Thomas H. Campbell LEWIS & ROCA 40 N. Central Avenue Phoenix, Arizona 85007	Andrew O. Isar TRI 4312 92 nd Avenue, N.W. Gig Harbor, Washington 98335
Michael W. Patten Roshka Heyman & Dewulf 400 N. 5th St., Ste. 1000 Phoenix, AZ 85004	Richard M. Rindler Morton J. Posner SWIDER & BERLIN 3000 K Street, N.W. Suite 300 Washington, DC 20007	Charles Kallenbach AMERICAN COMMUNICATIONS SERVICES I 131 National Business Parkway Annapolis Junction, MD 20701
Thomas F. Dixon MCI TELECOMMUNICATIONS	Jon Loehman, Managing Director SBC Telecom, Inc.	Richard S. Wolters AT&T & TCG

CORP 707 17th Street, #3900 Denver, Colorado 80202	5800 Northwest Parkway Suite 135, Room 1.S.40 San Antonio, TX 78249	1875 Lawrence Street, Room 1575 Denver, Colorado 80202
Joyce Hundley UNITED STATES DEPARTMENT OF JUSTICE Antitrust Division 1401 H Street NW, Suite 8000 Washington, DC 20530	Joan Burke OSBORN MALEDON 2929 N. Central Avenue, 21st Floor P.O. Box 36379 Phoenix, Arizona 85067-6379	Scott S. Wakefield, Chief Counsel RUCO 2828 N. Central Avenue, Suite 1200 Phoenix, Arizona 85004
Mark J. Trierweiler Vice President Government Affairs AT&T 111 West Monroe St., Suite 1201 Phoenix, Arizona 85004	Daniel Waggoner DAVIS WRIGHT TREMAINE 2600 Century Square 1501 Fourth Avenue Seattle, WA 98101-1688	Alaine Miller NEXLINK Communications, Inc. 500 108 th Avenue NE, Suite 2200 Bellevue, WA 98004
Douglas Hsiao RHYTHM LINKS, INC. 6933 S. Revere Parkway Englewood, CO 80112	Raymond S. Heyman Randall H. Warner ROSHKA HEYMAN & DeWULF Two Arizona Center 400 N. Fifth Street, Suite 1000 Phoenix, Arizona 85004	Diane Bacon, Legislative Director COMMUNICATIONS WORKERS OF AMERICA 5818 North 7 th Street, Suite 206 Phoenix, Arizona 85014-5811
Gena Doyscher GLOBAL CROSSING LOCAL SERVICES, INC. 1221 Nicollet Mall Minneapolis, MN 55403-2420	Karen L. Clauson ESCHELON TELECOM, INC. 730 Second Avenue South, Suite 1200 Minneapolis, MN 55402	Mark P. Trnicherio Davis, Wright Tremaine 1300 SW Fifth Avenue, Suite 2300 Portland, OR 97201
Robert S. Tanner Davis, Wright Tremaine 17203 N. 42 nd Street Phoenix, AZ 85032	Bradley Carroll, Esq. COX ARIZONA TELCOM, L.L.C. 1550 W. Deer Valley Rd. Phoenix, AZ 85027	Mark N. Rogers EXCELL AGENT SERVICES, L.L.C. 2175 W. 14 th Street Tempe, AZ 85281
Janet Livengood Regional Vice President Z-Tel Communications, Inc. 601 S. Harbour Island Blvd. Tampa, FL 33602	Jonathan E. Canis Michael B. Hazzard Kelly Drye & Warren L.L.P. 1200 19 th Street, NW, 5 TH Floor Washington, D.C. 20036	Andrea P. Harris Senior Manager, Regulatory Allegiance Telecom, Inc of Colorado 2101 Webster, Suite 1580 Oakland, CA 94612
Timothy Berg FENNEMORE CRAIG 3003 N. Central Ave., Suite 2600 Phoenix, Arizona 85016	M. Andrew Andrade, Esq. TESS Communications, Inc. 5261 S. Quebec St. Ste 150 Greenwood Village, CO 80111	Maureen Arnold Qwest Communications, Inc. 3033 N. Third Street, Room 1010 Phoenix, Arizona 85012
Dennis D. Ahlers, Sr. Attorney Eschelon Telecom, Inc. 730 Second Ave. South, Ste. 1200 Minneapolis, MN 55402		

Suzanne Anderson