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MAR 11 2002

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Commissioner

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IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
§ 271 OF THE
TELECOMMUNICATIONS ACT OF
1996.

DOCKET NO. T-00000B-97-0238

**QWEST'S VERIFIED SURREPLY TO AT&T'S REPLY ON ITS MOTION
TO REOPEN AND SUPPLEMENT THE RECORD ON CHECKLIST
ITEM 7 (911)**

INTRODUCTION

Qwest submits this Verified Surreply to AT&T's Reply on its Motion to Reopen and Supplement the Record on Checklist Item 7 (access to 911), filed on March 4, 2002.¹

AT&T claims that Qwest's Verified Response to AT&T's Motion to Reopen and Supplement the Record on Checklist Item 7 (911) ("Qwest's Verified Response") "does not reflect the magnitude of the problem nor does it offer a viable solution." On both points, AT&T is incorrect. As set forth in Qwest's Verified Response, AT&T has dramatically overstated the number of records that Qwest has supposedly failed to unlock. As set forth in Qwest's Verified Response, based upon data provided by Intrado as of February 12, 2002, only nine AT&T

¹ The factual information in this surreply is verified by Ms. Margaret S. Bumgarner, who testified in the workshop proceedings on Qwest's compliance with checklist item 7.

records were locked to Qwest in Arizona, and Qwest has since requested that Intrado unlock those records. Qwest has further investigated the alleged locked records in Confidential Exhibits B, C, and D attached to the Affidavit of Kenneth L. Wilson submitted with AT&T's Reply. As with AT&T's original allegations, these allegations, too, are overstated. Based upon its investigation, Qwest determined the following:

- Confidential Exhibit D contains records that Mr. Wilson acknowledges were unlocked as a result of efforts in November 2001 to address records AT&T claimed were locked to Qwest. Qwest has investigated these numbers and it appears that at least half of them (616 numbers) are assigned to AT&T's local services affiliate, TCG. Specifically, TCG was assigned the relevant NXX code in the Local Exchange Routing Guide ("LERG"). This means that these 616 records belonged to TCG (not Qwest), and TCG was therefore the party responsible for unlocking these records in the event the number was ported to another carrier. Based upon Qwest's investigation, 292 records were locked to Qwest. As AT&T acknowledges, those numbers were included in the November 2001 reconciliation effort. Qwest's complete investigation of these numbers is *detailed below*.
- Exhibit B contains what AT&T claims is a list of 156 pending unlocks in Arizona in which Intrado has sent AT&T a "755" error. These are "soft" errors that Intrado recycles for 14 days, without requiring intervention from carriers. The overwhelming majority of the numbers on Confidential Exhibit B (147 numbers) are currently locked to TCG. In other words, the unlock was processed and the record then locked to TCG. Three records have not been ported yet by AT&T, and six records are locked to another service provider. Thus, virtually all of the unlock requests on Confidential Exhibit B have been processed, and the

remaining locked records are locked due to no fault of Qwest. Thus, none of these are pending migrate orders.

- Confidential Exhibit C contains what AT&T claims is a list of 108 pending unlocks in Arizona for which Intrado has not received an unlock message for 14 days. These are records for which AT&T would receive a "760" error. All of these records are either locked to TCG currently, have not been ported, or are locked to another service provider (not Qwest). In other words, Qwest is not responsible for any pending 760 errors on Confidential Exhibit C. Thus, none of these are pending migrate orders.
- AT&T claims that the process Intrado has developed will not work and is untested. As Confidential Exhibit 5 to Qwest's Verified Response states, Intrado has developed clear processes and a dedicated Staff to perform the unlock investigations. NENA also has recommended the process Intrado is using. Furthermore,² *****BEGIN CONFIDENTIAL DISCUSSION*****

*****END CONFIDENTIAL DISCUSSION*****

² Qwest does not believe the redacted discussion and Confidential Exhibit 1 to this Surreply are necessarily confidential to AT&T. Out of a surfeit of caution, Qwest has marked this discussion confidential. If Staff or AT&T disagrees, Qwest would not oppose redesignating this discussion non-confidential.

Qwest strongly believes that 911/E911 services should be provided reliably and in a nondiscriminatory fashion. However, AT&T also has responsibility for managing its records in the E911 database. AT&T repeatedly claims that Qwest has "failed" to unlock records in the E911 database although the data show that AT&T is submitting migrate records before it has finished its number porting activities or when the record is locked to other carriers, not Qwest. Industry standards from the National Emergency Number Association ("NENA") state that carriers are to validate that they completed their number porting functions before requesting updates to the E911 records (i.e., migrate records). As Qwest's investigations have revealed, it is not Qwest's failure to unlock records that is causing many of the "problems" of which AT&T complains. Instead, it is AT&T's failure to determine the status of its number port activities before it asks for an unlock that has led to many of the errors AT&T receives. Furthermore, many of the locked records about which AT&T complains are locked to other carriers. Where a record is locked by another carrier, Qwest has no role in the unlocking of that record.

Despite the absence of evidence to support AT&T's assertions, Qwest is ahead of the curve in addressing the issue of locked E911 records. As stated in Qwest's Verified Response, Qwest has implemented the December 2001 draft NENA recommendations to address locked records. Qwest contracted with Intrado to implement the NENA-recommended process to unlock Qwest records based on validation in NeuStar's number portability database that the CLEC has activated the number port. As scheduled, Intrado implemented that solution on February 25, 2002. Qwest has also arranged under this process for Intrado to unlock CLEC records (upon CLEC authorization to do so) at no charge to CLECs. Thus, Qwest has demonstrated its commitment to provide 911/E911 services in a reliable and nondiscriminatory manner.

DISCUSSION

B. AT&T Again Has Overstated The Number Of Records Locked By Qwest.

In its Reply, AT&T takes issue with Qwest's claim that as of the filing of Qwest's Verified Response, AT&T had only nine Arizona numbers locked to Qwest. AT&T alleges that it has experienced over 1,100 locked E911 records in the past year.³ AT&T further claims that it currently has 156 records that are locked to Qwest and that received a "755" error code and 106 records locked to Qwest that have received a "760" error code.⁴ Both of these claims are incorrect.

AT&T admits that it has not kept historical records of numbers for which it has received a "755" error code and has not kept complete records of numbers that receive the "760" error code before November 2001.⁵ AT&T further admits that it has not fully investigated either the 156 "755" errors or the 108 "760" errors on Confidential Exhibits B and C.⁶ Qwest has investigated all of the numbers on AT&T's Confidential Exhibits, and again states that AT&T is exaggerating its claims. Qwest's investigation is described below and summarized on Exhibits 2-4.

1. Analysis of Confidential Exhibit D

With respect to the numbers listed on Confidential Exhibit D, AT&T admits that there are many "repeats" or duplicates on this list. According to AT&T, there are 1,206 numbers on

³ AT&T Reply at 2.

⁴ Wilson Affidavit ¶¶ 9-10. As discussed in Qwest's Verified Response, the "755" error code is a "soft" error. It does not require CLEC action. Rather, Intrado reprocesses numbers that receive a 755 error for 14 days. If Intrado is unable to process the number, then the carrier submitting the order receives a "hard" 760 error. Carriers are responsible for investigating the 760 errors.

⁵ *Id.* ¶ 11.

⁶ *Id.* ¶ 9.

Confidential Exhibit D and 1,142 unique numbers.⁷ Based upon Qwest's investigation of Confidential Exhibit D, over half of the numbers (616 numbers) are assigned to TCG (not Qwest) and ported to another CLEC (again, not to Qwest). Qwest reaches this determination because the 616 numbers have two NXX codes (602-606 and 602-735) that are assigned to TCG in the LERG. Accordingly, at least half of the numbers on Confidential Exhibit D do not belong to Qwest and were neither ported from nor ported to Qwest. Thus, Qwest had no involvement with these records at all. TCG was assigned these numbers by the North American Numbering Plan Administrator ("NANPA") and was the party responsible for porting them to another CLEC. These numbers reside in the TCG switch and Qwest has no involvement in the porting of these numbers between TCG and another service provider.

Furthermore, Qwest's investigation reveals that 200 numbers on Confidential Exhibit D have not been ported as of March 6, 2002. Thus, there should have been no unlock request for these numbers. Qwest bases this determination on the fact that these numbers are not found in the local number portability database, and thus have not been activated as ported numbers. Sixteen of these numbers are assigned to neither Qwest nor AT&T. Rather, based upon the NXX code, Qwest has determined that these numbers were assigned to another CLEC and were ported to AT&T. Again, Qwest had no involvement with the porting or the locking/unlocking of these numbers in this transaction between two CLECs. Thirteen of the numbers were ported to another CLEC, not AT&T. Six of these numbers were ported between two CLECs; Qwest was not involved in these ports. One number is an AT&T number that was ported to Qwest. For this number, AT&T was the party responsible for unlocking the record.

⁷ AT&T notes that there are 64 duplicate numbers on the list. *Id.* ¶ 7-8. Because Qwest could not manipulate the list in Exhibit D to exclude duplicates, Qwest manually counted them and found 63 duplicate numbers.

Excluding the records described above, there are approximately 292 numbers that Qwest determined belonged to Qwest. As AT&T acknowledges, these numbers were included in the November 2001 reconciliation of unlocked records.⁸

2. Analysis of Confidential Exhibit B

Qwest investigated all 156 records on Confidential Exhibit B. These are the records that have received a "soft" 755 error. Based upon Qwest's investigation, for 147 of these 156 records, the record is currently locked to TCG in the E911 database. None of these 147 records turned into "hard" 760 errors. Three numbers have not been ported according to data in the local number portability database. In other words, for these records, AT&T had not completed its provisioning work, should not have sent a migrate record request to Intrado, and Intrado should not have unlocked the record. Six of these records are locked to another service provider other than TCG or Qwest. Thus, Qwest is not responsible for unlocking these records. Therefore, every number on Confidential Exhibit B is either locked to TCG already or remains locked due to no fault on Qwest's part.

3. Analysis of Confidential Exhibit C

Qwest has investigated all 108 numbers listed on Confidential Exhibit C. These are the records for which AT&T allegedly received a 760 error, meaning that Intrado could not process the migrate order for 14 days. Based upon Qwest's investigation, 31 of these records are currently locked to TCG. Twenty seven of these records have not been ported according to data in the local number portability database. Again, for these 27 records, AT&T has not completed its provisioning work, and Qwest should not have unlocked the record. Fifty of these records are locked to another service provider other than TCG or Qwest. Thus, Qwest is not responsible for unlocking these records. Thus, there are no 760 errors on Confidential Exhibit C for which Qwest is responsible.

⁸ *Id.* ¶ 7, 9.

C. Qwest Has Implemented NENA-Recommended Processes For Addressing Record Locks/Unlocks.

As discussed in Qwest's Verified Response, unlocking of customer records has been an issue discussed in the national industry meetings for both the Local Number Portability Administration - Working Group ("LNPA") and NENA. In its December 2001 meeting, NENA reached agreement on a draft standard recommendation for handling the unlocking of records by database administrators so that the migrate orders from the new service provider can be processed in a more timely manner.⁹ The draft NENA standard is currently in the approval process by the NENA membership. It has passed two levels of the approval process, and Qwest anticipates final approval of the standards by the end of the first quarter of 2002.

Following the NENA meeting, Qwest began discussions with Intrado to implement the new process for unlocking Qwest records for the new service provider's migrate orders. In accordance with the time line previously submitted as Confidential Exhibit 5 to Qwest's Verified Response, Intrado implemented this new process on February 25, 2002. Under this process, if the new service provider's E911 database update (i.e., migrate order) is unsuccessful due to a locked record, Intrado will access the Local Number Portability ("LNP") database, NeuStar's Number Portability Administration Center ("NPAC") database, to determine if the new service provider has activated the port. If the CLEC has activated the port subscription in the NPAC, Intrado will then unlock the record and process the migrate order to update the E911 database. Intrado has a dedicated team assigned to perform this function.

As Qwest pointed out in its Verified Response, CLECs will also benefit from Qwest's proactive efforts. Intrado has agreed to unlock a CLEC's customer records under this process, for no additional charge, if authorized to do so by the CLEC. In addition, Intrado has sent notification to all of the service providers' (CLECs and incumbent LECs) 911 database

⁹ The draft NENA standard was attached to Qwest's Verified Response as Exhibit 4.

administrator contacts regarding this process. Although AT&T claims that Intrado's process is unworkable and insufficient, AT&T takes no issue with the fact that this process is the one currently recommended by NENA. Clearly, the industry has reached consensus in the NENA that this process will alleviate locking and unlocking issues for all carriers. Moreover, Qwest has learned from Intrado that since implementation of its solution, Intrado has investigated the unsuccessful migrates and when valid (i.e., the port activation is complete), cleared all migrate records submitted each day. In fact, on March 5, 2002, AT&T informed Qwest during hearings in Minnesota that AT&T had submitted hundreds of numbers to Intrado for unlocking to "test" the Intrado process. *****BEGIN CONFIDENTIAL DISCUSSION*****

*****END CONFIDENTIAL*****This, alone, should warrant rejection of AT&T's request to reopen the record on this checklist item.

C. AT&T's Demand For PID Review Is Unnecessary And, In Any Event, Must Be Raised In The TAG.

AT&T closes its reply with a claim that the DB-1 and DB-2 PIDs should be revisited or, alternatively, new PIDs developed to address the locking and unlocking of records. AT&T's

demand does not warrant reopening the record on this checklist item, nor does it warrant modifications to the PIDs. As Qwest's briefs and exhibits demonstrate, the "problem" of which AT&T complains is overstated and, in many instances, one of its own making. AT&T often submits its migrate orders to Intrado when the number port has not been completed and no unlock should be performed. Furthermore, many of the records on AT&T's most recent lists are locked to other carriers, not Qwest.

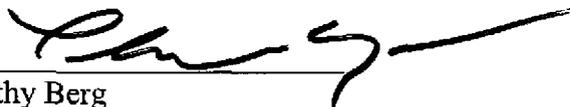
AT&T's issues with the PIDs are properly raised before the Technical Advisory Group, as AT&T is well aware. Although Qwest disagrees that PID modifications are necessary, if AT&T believes that it can make a case for PID changes, then it must bring its case to the TAG so that all carriers can participate and the experts who have been addressing the PIDs can evaluate AT&T's claims. The TAG is a collaborative process, and AT&T cannot short circuit that process.

CONCLUSION

There is no need to reopen the record on checklist item 7. As Qwest has demonstrated twice now, AT&T is overstating its claims regarding the number of Qwest locked records and the magnitude of the "problems" it has encountered. Furthermore, Qwest has implemented an industry-recommended solution to this issue that is working, apparently to the satisfaction of TCG. Qwest respectfully requests that Staff and the Commission deny AT&T's motion.

DATED: March 11, 2002

Respectfully submitted,

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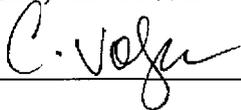
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BEFORE THE ARIZONA CORPORATION COMMISSION

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

IN THE MATTER OF
QWEST CORPORATION'S
SECTION 271(c) APPLICATION

)
) Docket No. T-000A-97-0238
)
) VERIFICATION OF
) MARGARET S. BUMGARNER
)

STATE OF WASHINGTON
COUNTY OF KING

)
)
) SS
)

Margaret S. Bumgarner, of lawful age being first duly sworn, deposes and states:

1. My name is Margaret S. Bumgarner. I am a Senior Staff Advocate, Policy and Law for Qwest Corporation in Seattle, Washington.
2. I hereby swear and affirm that the statements and data contained in the attached comments are true and correct to the best of my knowledge and belief.

Margaret S. Bumgarner
Margaret S. Bumgarner

SUBSCRIBED AND SWORN before me this 11TH day of March, 2002.

Elizabeth M. Weber
Notary Public

My Commission Expires:

03/16/02



Exhibit 1

Qwest Corporation
3/11/02

CONFIDENTIAL AND PROPRIETARY

PUBLIC VERSION

(Redacted)

EXHIBIT 2

Summary of Qwest Analysis of AT&T Confidential Exhibit D

Analysis of Telephone Numbers (TNs)	Total Number of TNs (1,206)
Duplicate TNs	63
TN is assigned to TCG, not Qwest	616
TN not found in the LNP database (i.e., not ported)	200
TN is assigned to another CLEC, not Qwest	16
TN is ported to another CLEC, not AT&T	13
TN is ported CLEC to CLEC; Qwest not involved	6
TN is ported from AT&T to Qwest	1
TNs ported from Qwest to AT&T	292 [on November 2001 reconciliation list sent to AT&T]

EXHIBIT 3

Summary of Qwest Analysis of AT&T Confidential Exhibit B

Analysis of Telephone Numbers (TNs) That Received 755 Error Code	Total Number of TNs (156)
Locked to TCG	147
Locked to another service provider, neither Qwest nor TCG	6
TN not found in the LNP database (i.e., not ported)	3
TNs that Qwest should unlock	0

EXHIBIT 4

Summary of Qwest Analysis of AT&T Confidential Exhibit C

Analysis of Telephone Numbers (TNs) That Received 760 Error Code	Total Number of TNs (108)
Locked to TCG	31
Locked to another service provider, neither Qwest nor TCG	50
TN not found in the LNP database (i.e., not ported)	27
TNs that Qwest should unlock	0