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ARIZONA CORPORATION COMMISSION
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1 **LEWIS**
2 AND
3 **ROCA**
4 LLP
5 **LAWYERS**

6 **BEFORE THE ARIZONA CORPORATION COMMISSION**

7 **WILLIAM A. MUNDELL**
8 **Chairman**

9 **JAMES M. IRVIN**
10 **Commissioner**

11 **MARC SPITZER**
12 **Commissioner**

Arizona Corporation Commission

DOCKETED

MAR 11 2002

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13 **IN THE MATTER OF U S WEST**
14 **COMMUNICATIONS, INC.'S**
15 **COMPLIANCE WITH § 271 OF THE**
16 **TELECOMMUNICATIONS ACT OF**
17 **1996**

Docket No. T-00000A-97-0238

18 **WORLDCOM'S COMMENTS ON**
19 **AT&T'S LIST OF ISSUES FOR**
20 **CHANGE MANAGEMENT PROCESS**

21 WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits the
22 following areas of concern surrounding Qwest's Change Management Process for
23 systems, products and process. These concerns are critical so that unless resolved they
24 will continue to adversely impact WorldCom's and other CLECs' abilities to compete (see
25 CMP history in WorldCom response to Qwest's Brief on Change Management and
26

1 Qwest's Status Report on the Status of Change Management Process Redesign dated
2 February 21st).

3
4 These issues are also being discussed in the Qwest CMP Redesign sessions and
5 WorldCom's intent is to resolve these issues collaboratively. WorldCom concurs in the
6 issues raised by AT&T in its issues list and has cross-referenced AT&T's list. WorldCom
7 is simply identifying key issues. However, in the event these issues cannot be resolved
8 collaboratively, WorldCom requests the assistance of the ACC to determine final
9 resolution of nay impasse issues, should any arise. Beyond the development of these
10 processes, WorldCom recommends evidence be provided by Qwest to demonstrate that
11 negotiated processes have been implemented as expected with no further negative impacts
12 on CLECs business.
13

14
15 **THE STEPS OF THE SYSTEMS CR LIFE CYCLE PROCESS NEED TO BE**

16 **FULLY DEFINED, IMPLEMENTED AND VALIDATED**

- 17
18 1. Initiation (Regulatory...Impasse PID/PAP / Industry Guidelines treatment) –
19 AT&T Issues A, A8 and A9
- 20 2. Clarification – implemented, but not validated
- 21 3. Evaluation methodology performed by Qwest – AT&T Issues A1 and A4
- 22 4. Response type
- 23 • Accept
- 24 • Deny – AT&T Issue A2
- 25
26

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- Resolve via P&P CMP (Cross Over Candidate) - AT&T Issue A7
 - Non-coding changes - AT&T Issue 3
 - Other options?
5. Invoke escalation process (optional) - AT&T Issue A11
 6. Address with CLEC Community
 7. Exception Process
 8. Prioritization
 - Collaboratively determined “above the line” candidates
 - Implementation options (manual vs. mechanized) - AT&T Issue A12
 9. Result of Prioritization
 - Baseline Candidate for next available release
 - Invoke Special Change Request Process (optional)
 - Remains in bucket for future releases
 10. Invoke dispute resolution process (optional at any time) / FCC requirement - AT&T Issue A11

PROCEDURES SURROUNDING PAP CHANGES NOT YET DEFINED OR IMPLEMENTED - AT&T Issue A6

Changes required as a result of PAP that impact PID results, systems, products or processes must be addressed in the formal change management process. Lack of insight to changes as a result of PAPs would place CLECs at a distinct disadvantage. PID results

1 have been audited and presumed to be reliable thus any changes that will impact those
2 results must be noticed to CLECs. Changes to systems, products or processes as a result
3 of the PAP must follow formal CMP so that CLECs are provided input, if necessary, and a
4 greater ability to adjust to changes.
5

6 **CLEC SUPPORT MECHANISMS NOT YET DEFINED AND IMPLEMENTED –**

7 **AT&T Issues A10**

8 CLECs are reliant on Qwest's ability to support issues that result from Qwest
9 systems, product or process changes. Thus it is critical to establish the appropriate
10 mechanisms for CLECs to gain support without wasting time tracking down appropriate
11 sources.
12

13 **PRODUCT AND PROCESS CMP IS AS SIGNIFICANT AS SYSTEMS CMP –**

14 **AT&T Issues A5 and Part c**

15 Product and Process CMP must be defined so that CLECs are not adversely
16 impacted by sheer "notice and go" concept. CLECs must have input to changes in
17 products and processes as they do with systems due to the impact those changes impose
18 upon our ability to support our end users. These changes impact wholesale customers
19 only, not Qwest's retail division. In addition, the notification process employed by Qwest
20 is not yet centralized. As a result CLECs receive multiple notices from separate sources.
21
22

23 **SPECIFIC FCC REQUIREMENTS NOT CURRENTLY MET – AT&T Part J**

24 FCC Requirements specifically call for CLECs to have "substantial input in design
25 and continued operation" and that Qwest proves a "pattern of compliance". Although
26

1 Qwest CMP has been in place for nearly two years, there is much evidence to support
2 Qwest dictated changes to systems, product and process that solely impacted how
3 wholesale customers do local business with Qwest. Given the remaining outstanding
4 issues being identified by the Redesign Team, it is essential that not only collaborative
5 processes be established but that Qwest implement these processes and prove they are
6 working as expected.
7

8
9 FCC Requirements specifically call for there to “exist a stable testing environment
10 that mirrors production.” While Qwest EDI Stand Alone Test Environment is in place,
11 there continues to be testing with results that highlight issues remain.

12
13 FCC Requirements specifically recognizes the need to have “information clearly
14 organized and readily accessible” and “efficacy of documentation available for building an
15 electronic gateway.” WorldCom concurs that information must be organized and readily
16 accessible and that technical documents must accurately reflect system requirements due
17 to the sheer reliance CLECs have on Qwest documented procedures. Thus, Qwest must
18 provide evidence that these FCC requirements have been met.
19

20 CONCLUSION

21
22 While WorldCom has identified the above issues, it has done so knowing that some
23 of the concepts contained within the issues have gone to apparent consensus. By
24 identifying the issues above, WorldCom is not retracting any agreements on consensus
25 reached in last week’s redesign meetings.
26

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