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BEFORE THE ARIZONA CORPORATION COMMISSION

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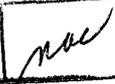
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**IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996**

Docket No. T-00000A-97-0238

**AT&T'S COMMENTS ON POST-271
PID ADMINISTRATION**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T") hereby file their comments on the proper way for Qwest Performance Indicator Definitions ("PIDs") to be administered following completion of the third-party operations support systems ("OSS") test as requested by Staff, *i.e.*, a Post-271 PID Administration process.

- A. PIDs should be administered by an entity similar to the Regional Oversight Committee ("ROC") OSS Test Advisory Group ("TAG"), Steering Committee and Executive Committee structure.**

AT&T believes the PIDs should be administered in a multi-state, industry-wide forum. The PIDs were designed to measure the performance of Qwest processes that have some, but generally, no state-to-state variances. Common administration of the PIDs will offer time and cost efficiencies that would be lost in multiple, state-specific administration.

Collaborative work efforts were generally successful in Arizona PID administration throughout the third-party test. AT&T finds that the ROC OSS TAG, Steering Committee and

Executive Committee structure likewise has been quite successful in reaching agreement on literally hundreds of PID related issues. When agreement was not possible in the ROC OSS TAG, the Steering Committee and Executive Committee appeal processes proved they could make expeditious and reasoned decisions.

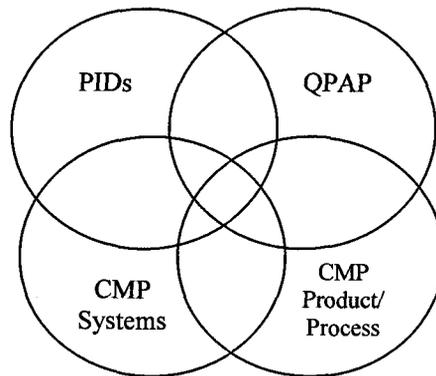
Since the creation of the ROC OSS TAG, Steering Committee and Executive Committee, other multi-state, industry-wide groups have been created. The Change Management Process (“CMP”) exists and contains two essential elements. The first element is for the administration of changes to Qwest’s OSS. The second element is for changes to Qwest’s products and processes. In addition to the two CMP elements, Quality Performance Assurance Plan (“QPAP”) issues point towards a multi-state, industry-wide approach to periodic plan reviews, periodic audits of the performance measurement systems and modifications to either the QPAP or the PIDs. For example, it would be an inefficient use of time and resources to have fourteen individual audits of the same Qwest performance measurement systems and processes.

While the groups and mechanisms for the administration of PIDs, CMP Systems and CMP Process and Product have been separately developed, it has become increasingly clear that there is much overlap between the functions. Change requests submitted by CLECs in the CMP Process and Product forum have been denied because Qwest considered the request a PID-related issue. Changes in Qwest’s processes or new Qwest processes developed through the CMP Process and Product forum have created a need for new or modified PIDs to measure the performance of the new or modified process.

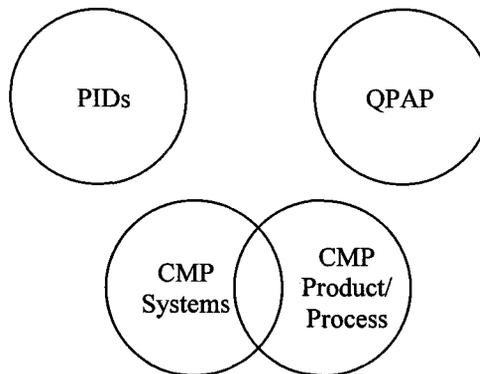
In addition to the overlap between PIDs, and the CMP Systems and CMP Process and Product elements, the still developing QPAPs are adding to the overlap. For example, Qwest has submitted change requests in the CMP Systems forum to address its potential payment liabilities

under the Colorado QPAP. Also, since the various QPAPs rely upon the PIDs, there should be no question that the QPAPs, in whatever form, will overlap with PID administration.

AT&T views the natural interrelationship between the four functions as follows:



While AT&T believes the above diagram represents the nature of the interrelationships, the reality to date has been more like the below diagram:



It has been AT&T's experience that important issues that are partly PID-related and partly CMP Process and Product-related have been lost in the cracks between the CMP and the ROC OSS TAG. When raised in the CMP Process and Product forum Qwest has deemed the issue PID-related and outside the scope of that forum. When raised in the ROC TAG, Qwest has argued that the issue is not appropriate for discussion because it impacts upon Qwest's products

or processes. AT&T is concerned that if the natural interrelationships are permitted to continue to be ignored, Qwest can use the gaps between the forums to delay issues important to the competitive local exchange carriers ("CLECs") from being addressed or to keep the issues from being addressed altogether.

AT&T believes one of the more important goals in the development of the post-271 administrative environment is to ensure that there is a means to keep issues from falling into the cracks between the various forums. Issues that cannot be adequately addressed collaboratively will likely end up as the basis for complaints filed at the Commission.

AT&T is not proposing an omnibus group to cover PIDs, QPAP, and CMP systems, product and processes changes. However, any model that is developed must recognize and accommodate the need for joint discussion across one or more of these groups. For example, a single desired change may impact upon Qwest systems, PIDs, and the QPAP. The model should permit joint discussions on the impact of the change between the CMP elements and the PID and QPAP administration groups.

B. The ROC Model has been proven to be successful

For the administration of PID-related issues, AT&T suggests that the ROC TAG, Steering Committee and Executive Committee model be followed. That model has a proven track record of success. However, to accommodate any concerns of an appearance of delegation of a Commission's authority to the ROC group, AT&T suggests that a final layer of administration be added to the top of the ROC model. That layer would be the right of any party to appeal an agreement or decision from the ROC group to the Arizona Corporation Commission or any other suitably situated commission.

A combination of the multi-state, industry-wide ROC model with the right of appeal to a state commission takes advantage of the efficiencies of the collaborative model while still preserving and recognizing the authority of the individual state commissions. A model that permits the ROC group to do the “heavy lifting” of identifying the issues, creating a record and proposing consensus agreements or resolution of disputed issues while providing ultimate authority to the state commissions will ensure that full and complete records are before the commissions. It should also result in much quicker resolution of issues across multiple states.

For the parties that may not have the resources to participate in the multi-state, industry-wide process (*i.e.* small CLECs and various offices of consumer counsel), the ability to appeal issues to the individual state commission ensures that the “price of admission” to the multi-state, industry-wide process is not a barrier to participation at the state level.

C. The proposed scope of functions to be managed in the PID Administration process

AT&T believes that scope of the PID administration function should include the following activities:

- Requests to delete or add PIDs;
- requests to modify existing PID language;
- selection of auditors for periodic and CLEC-requested audits;
- oversight over the scope of periodic and CLEC-requested audits;
- interpretation of PID language; and
- determinations of standards to be applied to PIDs (*i.e.* parity, benchmarks, diagnostic or TBD).

Apart from the scope of the PID administration activities, AT&T believes the PID administration function should perform the following roles:

- Provide a forum for individual or collective parties to raise and discuss PID-related issues (whether brought forth initially in this forum or brought in as a result of CMP or QPAP issues);
- attempt to drive the parties towards a consensus decision;
- when consensus is achieved, record the results of the decision;
- when consensus is not achieved, assist in the preparation of the evidence to support the opposing positions;
- resolve disputed issues; and
- provide for an appeal process if a party disputes the result of the initial dispute resolution.
- Coordinate/collaborate with the CMP body and parties involved in QPAP discussions, to the extent those groups raise issues that relate to or impact PIDs.

D. The design of the management and governance structure for the process

AT&T believes the management and governance structure should be similar to the one employed during the ROC test. Each of the participating states would have one representative on the Steering Committee. The Executive Committee would contain seven Commissioners from the participating states.

E. AT&T recommends the mechanisms for the PID administration process

The parties already have the benefit of the existing PIDs. As a result the administration should be devoted primarily to fine-tuning of the existing PIDs, as well as additions of new PIDs and deletions of PIDs that are no longer needed. The activities that would generally be considered PID administration are also many of the same activities that are identified as being part of the six-month QPAP review. AT&T believes the PID administration function should be considered the same as the PID activities identified in the six-month review. Efficiency would dictate that a PID issue raised and resolved in the PID administration function should not have to be once more addressed as part of the six-month review process (although some may be implemented at this point). As part of the six-month review process, increased attention will be

devoted to PID issues. However, the process should permit PID issues to be raised and addressed at any time.

The administration process itself should follow the process used during the Arizona and ROC tests. Any party can raise a PID issue, typically in the TAG forum. Once an issue is raised, one or more conference calls will be established to discuss the issue. If consensus on the issue can be reached, the PID will be modified to reflect the agreement. If agreement cannot be reached, the opposing parties will prepare impasse statements proposing a solution and advocating why that solution should be chosen. The Steering Committee will review the impasse statements and reach a decision. If there is no appeal, the decision will be implemented. If a party disagrees with a decision of the Steering Committee, it can appeal the decision to the Executive Committee. The opposing parties will have an opportunity to supplement their originally filed impasse statements. The Executive Committee will review the relevant documents and render a decision. If there is no appeal, the decision will be implemented. If a party disagrees with the decision of the Executive Committee it can appeal the decision to the participating states.

F. Conclusion

AT&T believes significant efficiencies can be gained by having PID administration managed within a structure that is modeled after the existing, successful ROC OSS TAG model. Further, we urge the Arizona Commission to immediately join the effort that is underway to give impetus to the launching of this function in the ROC structure.

Dated this 29th day of March, 2002.

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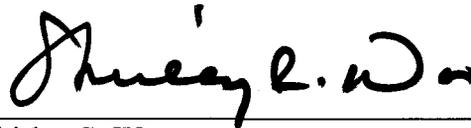
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