LEWIS AND ROCA LLP
LAWYERS

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman

JAMES M. IRVIN
Commissioner

MARC SPITZER
Commissioner

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**

WORLDCOM, INC.'S EXCEPTIONS TO RECOMMENDED OPINION AND ORDER ON PERFORMANCE ASSURANCE PLAN

WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits these Exceptions to the Recommended Opinion and Order. These Exceptions address one issue, inclusion of the PO-19 SATE measurement.

In paragraph 36 it is stated that:

> Staff agrees with WorldCom that the PO-19 SATE measurement be included in the [performance assurance plan] PAP, and recommends that if the parties are not able to develop a standard for this measure before the effective date of the PAP, then PO-19 should be diagnostic, and reviewed at the six-month PAP review.

In paragraph 37 it states in pertinent part:

> Because measurements are not yet developed for WorldCom's proposed "Software Validation", RQ-3 (Release Quality) and PO-19 (SATE), we find that these measures should be evaluated for possible inclusion at the six-month PAP review.

On or about April 3, 2002, the Staff issued its resolution of the impasse regarding PO-19, and set the standard at 95%. Attached hereto is Staff's resolution report for the PO-19 impasse issue. Since Staff has established the standard at 95%, under the terms of paragraph 36, PO-19 should be included in the PAP. Therefore, paragraph 37 should be modified in pertinent part to read as follows:

> Because the measurement is not yet developed for WorldCom's proposed "Software Validation", RQ-3 (Release Quality), we find that this measure should be evaluated for possible inclusion at the six-month PAP review.

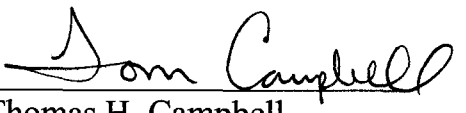
Since the condition precedent stated in paragraph 36 has been met, the Commission should include PO-19 in the performance assurance plan and the PAP attached to the ROO should be revised to include PO-19 at the 95% benchmark standard.

WHEREFORE, WorldCom requests the Commission grant these Exceptions and modify paragraph 37 as proposed and the include PO-19 in the PAP.

LEWIS AND ROCA LLP
LAWYERS

RESPECTFULLY submitted this 15th day of April, 2002.

LEWIS AND ROCA LLP



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Impasse Issue on Benchmark
for
PO-19 Stand-Alone Test Environment (SATE) Accuracy

A. Overview

With Qwest's offering of a Stand-Alone Test Environment (SATE), the CLECs proposed a PO-19 performance measure to evaluate Qwest's ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the SATE environment. The parties reached agreement on the performance indicator definition (PID) for the new measure.

"PO-19 SATE New PID 05Oct01DRAFT.c

Although the TAG has reached collaborative agreement on the PID description, it has been unable to reach agreement on the standard to be used for the PID. The parties agree that a benchmark is the proper type of standard but disagree on the benchmark level.

Qwest originally proposed a benchmark in the low 90's that would become effective in March 2002. The CLECs proposed a standard of 98%. In further discussions, Qwest offered 92% and then 95% to begin in March 2002. The CLECs' proposal remains at 98% beginning in March 2002.

B. Qwest Position

Qwest's original proposal for the PO-19 standard was diagnostic. When the CLECs indicated they would not agree to a diagnostic standard, in the spirit of compromise Qwest offered to establish a benchmark in the low 90's beginning in March 2002. Qwest continues to assert that, given the newness and ongoing changes of both the SATE process and the measurement of the process, the appropriate standard continues to be "Diagnostic," subject to some additional evidence and comments below.

Qwest notes that PO-19 is not in the AZ PAP. In as much as the six month review would consider what measurements should be added and which should be dropped, PO-19 could be included in the six-month review. This is the clear and appropriate approach for any process and measurement that is so new and dynamic. In the mean time, Qwest continues to work with CLECs in developing and updating the Stand Alone Test Environment. It is in the interest of both Qwest and CLECs for SATE to be useful and successful, with or without a standard applied to PO-19.

Qwest bases its positions on several factors as follows:

- Qwest originally proposed this measurement be diagnostic to allow a period of time for the code to stabilize. SATE is a relatively new process that has been in place for only a few months. As such, it is subject to the initial refinement common when any new software is deployed.
- In addition, in response to CLEC requests, Qwest anticipates further development of SATE capabilities over the next several months leading to continued relative instability in the code. Specifically the next several months will bring the following developments in the SATE environment:
    - When Qwest deploys version 9.0V on 1/28/02, it will be installing VICKI and its automated post-order transactions. It will be introducing another layer of complexity to SATE and to the PID test. Version 9.0V will require the testing of post-order scenarios as well as the existing transactions in the Data Document. This increases the number of transactions that Qwest tests, in addition to creating a reliance on a new system that may be modified to meet additional CLEC needs in its first few weeks. Qwest believes that it has a fairly stable environment now, but that will change drastically after release 9.0V is deployed.
    - In addition to the 9.0V release it has several major SATE releases planned in the first half of 2002:
        - SATE 9.0F in February, introduces Flow through and changes much of the data in SATE, thus resulting in significant changes to the Data Document that is used to verify the PID.
        - SATE 9.01 in March, introduces some new systems that SATE needs to interact with, including Facility Check.
        - SATE 9.0F phase 2 in May, includes additional significant data changes.
    - Not only is the SATE test environment a new environment, but the PID measurement is also new. Typically, for new measurements, an initial period is provided during which the PID remains diagnostic to allow for fine-tuning of the measurement reporting process. In this case, however, as noted above, the process being measured is facing changes that the parties agree should be made. Thus, implementing any benchmark initially would not provide a reasonable period for the measurement to reach stability.
    - In previous correspondence, CLECs have indicated Qwest should have a high benchmark because it requires that they have a transaction accuracy of 100% before they are certified. Comparing these two "benchmarks" is not an appropriate comparison for the following reasons – basically making it an "apples-to-oranges" comparison:
    - A CLEC passes a given test if their transaction works as desired. The multitudes of data values within a request or response are not verified. PO-19 measures the accuracy of Qwest's data, including detailed fields on a pre-order response as well as the transactions.
    - The CLECs typically certify to a smaller and more finite set of products. The PID tests all products and transactions contained in the Data Document.

- The CLECs use an iterative process to certify. That is, if they are not at 100% when they first execute their test, they can correct their transactions and re-execute.
- They can re-execute their test as many times as necessary in order to certify.
- They have approximately a 9-month window to gain certification. Qwest runs the PID test once per month and posts the results from that one test.
- Refinements will continue to be made to the code after the test transactions are completed but before the code is released to production. This by itself, while providing better code to production, could result in deviations from published data and business rules causing PID scenario failures. Thus, setting a high benchmark can adversely impact the responsiveness of the process.
- Generally, industry interface development projects are iterative in nature. This means that clarifications, questions, and resulting changes are to be expected. If Qwest were to attempt to meet a high PID benchmark, it could not easily make the changes required for an efficient certification process.
- Qwest began reporting results for PO-19 with November data. In November, the results were 94.46% based on 358 out of 379 transactions completing successfully. December results are higher, at 98.73%, based on 390 of 395 transactions, but this does not reflect the increasing complexity of future releases. Thus, recent high results are, by no means, justification for implementing any benchmark at the present time, let alone an overly-high benchmark such as the CLECs propose.

Given these facts, Qwest argues that it is clearly premature to establish any standard other than diagnostic at the present time. Going forward, Qwest proposes that the PAP six-month review is the most reasonable point for considering a benchmark. By that time, which could be about nine to twelve months from now, the SATE process should be stable and, following achievement of that stability, the measurement process should also be stable, with a few months of data to demonstrate it.

Nevertheless, if in considering the impasse it is determined that it is necessary to specify a standard now, Qwest recommends that the following schedule for applying a benchmark be adopted:

- Through May 2002 Diagnostic (based on above significant changes)
- June 2002 – forward <= 95 percent

In no case should the benchmark be set above 95 percent. When Qwest previously suggested a compromise with different timing and a somewhat-higher benchmark, it was before the magnitude of the above-described future changes were clear. Now that there is more clarity as to the upcoming SATE changes, as well as to what it will take to remain flexible in responding to CLECs' changing needs in a dynamic

environment, it is very clear that the ultimate benchmark should be no higher than 95 percent.

Verizon has an EDI Testing Environment and PID. While Verizon's environment is different than Qwest's, the benchmark for SATE errors is <= 5% errors, which translates to a 95% success rate. Qwest's ultimate proposal is consistent with this. Moreover, the FCC's acceptance of the Verizon benchmark would indicate their acceptance of the 95% level of performance as sufficient to provide a competitor with a meaningful opportunity to compete.

In conclusion, Qwest states that this is, fundamentally, an issue of timing and of what is ultimately and minimally necessary to provide an efficient CLEC a meaningful opportunity to compete. The best timing, which would permit a decision based on a stable process and measurement, would be to await the PAP six-month review before considering a standard other than diagnostic. Otherwise, based on more recent understanding of the dynamics of the environment, a benchmark clearly should not be established before June 2002 and should ultimately be no higher than 95 percent, which is more than minimally sufficient to provide an efficient CLEC with a meaningful opportunity to compete.

C. Position of AT&T and WorldCom ("CLECs")

The TAG has been working on the PO-19 measurement since mid-August, endeavoring to develop consensus on all aspects of the measure and to guide its implementation. Negotiations have succeeded except for the issue of the standard of performance. CLECs need a 98% accuracy standard to be in effect at March, 2002; and Qwest has offered to be measured against a standard of 95% accuracy. No other disputes remain.

PO-19 "Evaluates Qwest's ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the Stand-Alone Test Environment ("SATE") environment."[1] Qwest has implemented the SATE as the means by which CLECs can test EDI interfaces for pre-ordering and ordering against Qwest business rules and interface specifications. Qwest established the SATE because the FCC has required such a testing environment to approve applications under Section 271. Applications made by Verizon point out the strength of the CLEC testing environment made available starting with the New York case. The test environment has been part of each Verizon OSS showing in all subsequent applications. SBC applications, beginning with the Texas case have demonstrated its CLEC testing environment to meet the needs of CLECs with electronic interfaces. A Qwest application without a SATE would have been risky.

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[1] AZ 271 Working PID Version 7.0 November 16, 2001 (revised 011702) – PO-19

Staff engaged Hewlett Packard Consulting ("HP") to conduct a complete independent evaluation of the SATE to conclude whether it provides the necessary support to CLECs that avail testing for electronic interfaces in ways other than Qwest's interoperability testing. HP submitted its evaluation report on December 21, 2001 "SATE Summary Evaluation Report Version 3, December 21, 2001." Although AT&T may disagree with HP's findings on the SATE adequacy, HP's findings are nonetheless recorded in the report. Qwest, however cannot have it both ways: it cannot rely on the HP Report as a basis for showing SATE is adequate to meet CLECs' needs and then disavow HP's findings for purposes of setting a realistic benchmark for the SATE

The purpose of the SATE is to provide CLECs with a testing environment that is separate from the Qwest production environment, which would avoid production impacts caused by concurrent test processing. By its nature, testing can cause systems to fail, and the production users should not have to suffer the consequences of either successful, or unsuccessful testing. Moreover, the SATE is to provide a mirror of the production environment, such that a CLEC that has processed test orders successfully should expect that those same orders, placed into the production system, would yield like results. The measurement of the SATE processing is designed to show that Qwest has achieved mirroring in principle, and not mirroring by the literal meaning of an exact copy of the production systems. CLECs and Qwest share the opinion that if Qwest implements the SATE with sufficient attention to the modules for business rules in the LSR interfaces, processing systems, and the requisite legacy systems, CLECs can have reasonable assurance that order processing mirroring has been achieved. The implementation of Qwest's SATE on July 31, 2001, began prior to the negotiations for the PO-19 measurement.

There is no reason to believe Qwest would intend not to implement mirrored edit, validation, and format processes in the SATE compared with those in the production environment. In the HP testing of SATE, it found that Qwest is well on its way to implementing the SATE at quality levels that comport with the CLEC position "HP found that the accuracy and consistency of SATE test responses was adequate to support certification. At the time of this report, 100% of SATE Release 7.0 and 8.0 transactions have either passed the initial test or the re-test."[2] A CLEC building an EDI interface is reliant upon Qwest IMA User Guides, implementation guidelines and other Qwest-supplied documentation and the SATE assists in validating whether the CLEC's interpretations of Qwest's business rules and specifications are correct. The CLEC wants to test its implementation successfully and implement smoothly.

When CLEC EDI orders are processed by Qwest, the application of the business rules and processes that determine whether CLECs have used the proper interface specifications, is a pass/fail level of LSR evaluation; i.e., an EDI LSR must be 100% consistent, or it will be removed from electronic processing as a fatal reject or set aside for manual processing. Qwest provides no tolerance for less than completely accurate LSRs. For the mirroring principle to be equitably evaluated, the same standard should apply.

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[2] SATE Summary Evaluation Report Version 3, December 21, 2001 at pp. 9

The CLECs have worked effectively with Qwest on the implementation of the SATE and the PO-19 measurement. The relative newness causes a realization that the first seven to eight months of operation may find weak spots that need adjustment, or unforeseen implementation problems. The 2% tolerance level each month is a reasonable recognition by the CLECs that Qwest may find difficulties that need to be corrected to the SATE so that it operates just like the production environment.

PO-19 *does not evaluate the results of CLECs using the SATE*, but rather it reports on Qwest's own execution of the Qwest-developed "test deck" in the SATE for one transaction (pre-order and order steps) per defined scenario for each of the IMA releases using all current data definition documents. PO-19's description states:

> For this measurement, **Qwest will execute the test transactions** in the Stand-Alone Test Environment.
>
> - Release related test transactions will be executed when a full or point release of IMA is installed in SATE. These transactions will be executed within five business days of the numbered release being originally installed in SATE. This five-business day period will be referred to as the "Testing Window."
>
> - Mid-release monthly performance test transactions will be executed in the months when no Testing Window for a release is completed. These transactions will be executed on the 15th , or the nearest working day to the 15th of the month, in the months when no release related test transactions are executed. [Emphasis added.]

CLEC transactions have no influence on the results that Qwest would produce for PO-19. This measurement is an evaluation of Qwest's provision of the test data and the Qwest implementation of the SATE edit, validation, and business rules. If Qwest fails to properly develop the test data, resulting in PO-19 failures, the same data would already have been used by CLEC SATE users, necessitating re-work by the CLECs. If Qwest fails to properly implement the SATE edits, validations, and business rules, CLECs that believed they successfully tested using SATE would have to retest once the corrections to SATE are implemented. When errors have been found, Qwest has responded quickly to rectify the problem – demonstrating that it can. "During testing, the discrepancies [related to business rules consistency between the SATE and production systems] were addressed quickly and correctly by Qwest's EDI Implementation Team, which is the same organization that addresses such issues for CLECs using the SATE."[3]

The SATE should enable CLECs to conduct their testing in a reliable environment and then migrate to the production environment, assured that the testing was rigorous and thorough. Poor PO-19 results would demonstrate that CLECs do not have access to a test environment that supports effective implementation of electronic interfaces. Indeed, HP recommends "... the level of errors observed is reasonable given the relative newness of

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[3] *Id. at pp 9*

the SATE, and that the errors are manageable given the benefits SATE provides"[4] If a lesser standard is established, the ACC would ignore the perspective that its third party evaluator has documented as a result of a thorough evaluation of the SATE. ACC and Qwest want to be able to rely on HP's SATE evaluation to demonstrate that Qwest provides CLECs with a capability to effectively test electronic interfaces in a joint test environment. Once HP completes the evaluation and Qwest implements necessary modifications to comply with HP's recommendations, the SATE will be used by CLECs, to the extent that it is reliable and useful in gaining implementation efficiently. Reliability would be readily demonstrated by effective standards for the PO-19 measure.

To conclude, Qwest's preference for a 95% accuracy standard allows a higher level of errors in the SATE with the consequence of rejects and additional work for CLECs upon production turn-up. Given that CLECs are reliant on the Qwest-provided test bed for use in the SATE, and the demand of 100% accuracy for the EDI LSRs in Qwest's production environment, CLECs believe a 2% error-rate is not only reasonable, but fair in consideration of the fact that PO-19 measures Qwest's use of its own testing processes.

D. ACC Staff Resolution

The benchmark for PO-19 should be set at 95% beginning in March 2002. This benchmark will be reviewed at the six month PID review.

The ROC has set the benchmark for PO-19 at 95% for the other 13 states in the Qwest region with a planned review in six months. Their finding was that this benchmark did not seem unreasonable based on current results.

HP in their work in reviewing SATE was asked to provide a recommendation for PO-19. They also recommended a 95% benchmark for PO-19 at this time.

The Staff believes it is premature to set a higher benchmark. SATE became available for CLEC use only in August. The PID has only been recently developed and there is little experience with its results. PO-19 has not been audited.

HP has evaluated SATE's use in upgrading a major release (IMA 8.0 to 9.0) and utilized PO-19 for evaluating the performance. As part of its work, HP was asked to review the adequacy and accuracy of PO-19. In its Final SATE Report, HP has found the 95% benchmark to be adequate and within the range of reasonableness and comparable to standards set elsewhere pertaining to new software releases and changes. In summary, Staff believes that a 95% benchmark is adequate at this time, however Staff will require that the PO-19 benchmark be subject to further scrutiny and reevaluation at the 6 month PID review.

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[4] *Id. at pp. 8*

PO-19 – Stand-Alone Test Environment (SATE) Accuracy – 05 Oct 01 DRAFT

Purpose:
Evaluates Qwest's ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the SATE environment.

Description:

- Measures the percentage of test transactions published in the *IMA EDI Data Document – for the Stand Alone Test Environment (SATE)* that are successfully executed in SATE at the time a new IMA Release is deployed to SATE. In months where no release activity occurs, measures the percentage of test transactions published in the current IMA EDI Data Document-for the Stand Alone Test Environment (SATE) that are successfully executed in SATE during the mid-release monthly performance test.
- Includes one test transaction for each scenario published in the *IMA EDI Data Document – for the Stand Alone Test Environment (SATE).*
- Test transactions will be executed for each of the IMA releases supported in SATE utilizing all current versions of the *IMA EDI Data Document – for the Stand Alone Test Environment (SATE).*
- The successful execution of a transaction is determined by the Qwest Test Engineer according to:
  - The expected results of the test scenario as described in the *IMA EDI Data Document – for the Stand Alone Test Environment (SATE)* and the EDI disclosure document.
  - The transactions strict adherence to business rules published in Qwest's most current IMA EDI Disclosure Documentation for each release and the associated Addenda.
- For this measurement, Qwest will execute the test transactions in the Stand-Alone Test Environment.
  - Release related test transactions will be executed when a full or point release of IMA is installed in SATE. These transactions will be executed within five business days of the numbered release being originally installed in SATE. This five-business day period will be referred to as the "Testing Window."[1]
  - Mid-release monthly performance test transactions will be executed in the months when no Testing Window for a release is completed. These transactions will be executed on the 15th, or the nearest working day to the 15th of the month, in the months when no release related test transactions are executed.
- Test transaction results will be included in the Reporting Period during which the release transactions or mid-release test transactions are completed.

Reporting Period: One month	**Unit of Measure:** Percent
Reporting Comparisons: None	**Disaggregation Reporting:** None

Formula:
[(Total number of successfully completed SATE test transactions executed for a Software Release or Mid-release performance test completed in the Reporting Period) / (Total number of SATE test transactions executed for a Software Release or Mid-release performance test completed in the Reporting Period)]x 100

Exclusions:
None

Product Reporting: None	**Standard:** To Be Determined by Impasse Resolution
Availability: • **Under Development:** – Beginning with Nov 01 data on the Dec 01 report	**Notes:** 1. Due to accelerated implementation schedule for this PID the "Testing Window" associated with the 8.1 release will be within 12 business days of the 8.1 release being originally installed in SATE.