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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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2002 MAY 14 P 2:57  
AZ CORP COMMISSION  
DOCUMENT CONTROL

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

DOCKET NO. T-00000A-97-0238  
NOTICE OF ERRATA FILING

On May 8, 2002, the Staff of the Arizona Corporation Commission Staff ("Staff") filed its Supplemental Report on Qwest's Compliance with Checklist Item 2, Access to Unbundled Network Elements (UNEs), that address Qwest's Re-designed Change Management Process and Stand-Alone Test Environment. Staff hereby files these errata to the Supplemental Report on Checklist Item 2. The changes are: Page 14, para. 42, line 3, change "Conclusion" to Commission"; Page 41, para.139, line 8, change "STATE" to "SATE"; and Page 41, para. 143, line 3, change "28" to "32 LSR pairs (or 64 total transactions)." Please substitute the attached pages 14, 41 and 42 for the pages contained in Staff's May 8, 2002 filing.

RESPECTFULLY SUBMITTED this 14<sup>th</sup> day of May, 2002  
Arizona Corporation Commission

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MAY 14 2002

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Foregoing were filed this 14<sup>th</sup> day  
of May, 2002 with:

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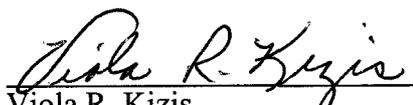
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b. IWOs have been addressed and suitable progress continues to be made at each Re-Design meeting.

c. Re-Design meetings themselves are amply attended by subject matter experts from Qwest.

40. CGE&Y also concluded that when the Re-Design effort is completed Qwest's Change Management Process will go far beyond any other such process in the local telecommunications industry. See CGE&Y Change Management Process Re-Design Evaluation at p. 13. CGE&Y stated further:

What the CLECs are attempting to achieve is an all-encompassing process whereby all of Qwest's wholesale products and processes, the systems that drive and are driven by these products and processes, the documentation that details both the systems and products/processes, the contracts that cover these areas, and the calculations by which all of the aforementioned are measured are kept in rigid synchronization by a system of presentation and prioritization. As such, it would become a quasi-regulatory process that would have implications for state regulators."

41. CGE&Y also recommended that:

.....Qwest provide CLECs a 45-day calendar day advance notice of final EDI design documentation. This recommendation simply suggests that Qwest conform to the timelines for issuance of EDI design documents, as presented by the CMP Re-Design Team. That basis for this recommendation can be found in the Relationship Management Evaluation section of this report on page 395, as well as in the CGE&Y report Qwest Change Management Process Re-Design Evaluation, Version 3.0, page 43. (Recommendation No. 7).

e. **Summary of Staff's Overall Conclusions and Recommendations**

42. Staff supports the findings and conclusions reached by its Test Administrator, CGE&Y, in its Qwest CMP Re-Design Evaluation dated March 25, 2002, and recommends that the Commission adopt it.

43. Staff also recommends the following:

- a. Qwest should continue to submit a monthly report on the status of its change management process Re-Design;
- b. Qwest should develop a report on the effectiveness of the Re-Designed Change Management Process. This report should include but not be limited to: a listing of CRs submitted and the submitting party, a listing of Qwest v. CLEC CRs submitted; a

In Arizona, Qwest stated that a total of 10 carriers have achieved production status after testing through SATE. Id.

**d. Staff Discussion and Recommendation**

140. In the evaluation of SATE, HP concluded that capabilities currently in place were adequate to support OSS Test program requirements. Staff concurs with the assessment of its technical consultant and accepts its principal conclusions. Staff is of the opinion that SATE, as it is currently structured, meets the FCC's requirements as to the availability of a stable testing environment provided by Qwest that affords the CLECs an adequate opportunity to test changes. Staff considers that the incorporation of SATE within the framework of the OSS Test fills a major void that existed at the inception of the OSS Test.

141. Staff believes that the majority of the CLEC's concerns have already been resolved. First, Staff required HP to test a New SATE Release utilizing Version 9.0 of Qwest's IMA Release as the test object. HP conducted this evaluation and issued a separate report entitled "SATE New Release Test Summary Report (9.0)." which found that Qwest's SATE is adequate to support New Release testing by a CLEC.

142. Staff resolved an issue brought to impasse by AT&T regarding the need to do a comprehensive test of VICKI and flow-through, two important enhancements made by Qwest to its SATE. Staff determined that since these enhancements were implemented after HP had done its primary evaluation of SATE and since they were "enhancements" to the test environment, HP was not required to do a comprehensive test of them. HP did do some testing of VICKI in its New Release Test, but not the comprehensive test desired by the CLECs.

143. Staff recently resolved another issue brought to impasse by AT&T which should go a long way in addressing many of their other concerns. While HP had done production mirror testing as part of its initial evaluation, by issuing 32 LSR pairs (or 64 total transactions) in both SATE and production systems and compared results,<sup>9</sup> Staff was concerned that SATE will in the future continue to mirror the production environment. AT&T's impasse brought to light the inadequacy of the PO-19 PID in measuring SATE against production for future releases. Because of the testing of SATE to date, HP has found that SATE adequately matches the production environment. However, as future releases are implemented, Staff is concerned that there will not be way to determine that SATE continues to match the production environment. In the Final Follow-Up Workshop, AT&T recommended that PO-19 PID be changed to include a requirement that SATE New Releases be mirror tested and evaluated against the productions systems. In its impasse resolution, Staff concurred with AT&T's recommendation. Staff directed Qwest to develop a new PO-19 that incorporates the requirement that new SATE Releases will be tested and evaluated against production systems. Mirror testing will be a requirement for new SATE releases. Qwest will execute transactions and evaluate

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<sup>9</sup> HP found that there was a match between SATE and production systems on fields and formats. However, HP found that there were differences in message content.

Release 9.0 utilizing the new PID. HP will provide a third party evaluation of the PID calculation and provide a report on its evaluation. Staff also determined that in addition to incorporating new release testing into the new PO-19, Qwest should also retain the existing PO-19 testing requirements with a modification to report the disaggregated testing results for each supported release. Appropriate benchmarks will be reviewed in the May 21, 2002 TAG meeting.

144. Staff is also of the opinion that certain enhancements to SATE proposed by HP in its Final Report would be inherently beneficial to the development of competition, and facilitate still greater effectiveness of the Stand Alone Test Environment for use by the CLEC community and still others were recommended to ensure its SATE's continued effectiveness and adequacy. Accordingly, Staff is of the opinion that Qwest should be required to actively pursue implementation of HP's recommendations. Accordingly, Staff proposes that a quarterly report from Qwest be provided that outlines implementation progress regarding the specific HP recommendations cited in its Final Report. This requirement will enable Staff to effectively monitor SATE enhancement in the future. Staff recommends that the Commission find that Qwest satisfies §271 requirements relative to SATE, so long as Qwest agrees to implement HP's and Staff's recommendations to the extent they have not already done so.

145. HP's recommendations from its initial SATE Summary Evaluation Report are as follows:

- a. Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.
- b. Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation. At a minimum, this should specifically address the Data Documents and the Production Errors Lists.
- c. To ensure continued adequacy of the SATE, HP recommended:
  - That Qwest clearly and specifically identify the roles and responsibilities of each individual and organization involved in the SATE. This definition of roles and responsibilities should include goals and objectives and mission statements for each organization and for all personnel. In addition, the job description for each employee should be clearly defined.
  - That Qwest develop a system of internal controls to ensure accountability for organizations and individuals involved in the SATE process. These controls should use clearly defined goals and objectives and should tie specifically to functional responsibility, such as quality of documentation, accuracy of test account data, mirror image of production, etc. Employees involved in the SATE should be encouraged to accomplish these goals and objectives.
  - That Qwest develop process flow documentation that accurately reflects actual SATE processes and is a reliable guide to CLECs using the SATE.