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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 OSS TEST REPORTS AND STAFF'S
SUPPLEMENTAL REPORTS ON CHECKLIST ITEM 2 (OSS)**

May 16, 2002

Richard S. Wolters

AT&T

1875 Lawrence Street, Suite 1503

Denver, CO 80202

(303) 298-6741

rwolters@att.com

Arizona Corporation Commission

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Gregory H. Hoffman

AT&T

795 Folsom Street, Suite 2161

San Francisco, CA 94107-1243

(415) 442-3776

ghoffman@att.com

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AT&T could list many additional reasons why the testing took the time it did. However, the point that AT&T wishes to make is that time and effort alone do not warrant a finding that Qwest's OSS are compliant with section 271 obligations. Any inference by CGE&Y, HP or Staff that this is the case should be ignored. AT&T will acknowledge that Qwest's OSS have improved, but improvement is not the legal standard either.⁸ AT&T requests that the Commissioners not be influenced by how long the test has taken or how much Qwest OSS have improved.

Staff in its Supplement Report dated May 1, 2002, provides a reasonable summary of Qwest's legal obligations to provide competitive local exchange carriers ("CLECs") with access to its OSS.⁹ In the spirit of brevity, AT&T will not endeavor to repeat the exercise. However, AT&T will provide additional authority where necessary.

The two major categories of issues remaining are (1) the information gaps from testing due to CGE&Y's failure to follow the Master Test Plan¹⁰ and the Test Standards Document¹¹ requirements that were negotiated among the parties and (2) the inadequacies that remain in Qwest's OSS that have been identified and which prevent any findings that Qwest has met its burden of proof that it provides nondiscriminatory access to its OSS.

One of the recurring themes that CGE&Y and Staff raise throughout their reports is that, while the test data showed disparities in processes and process results, exposed problems and significant system deficiencies, these should be discounted because there is commercial data that

initiated based on initial test deficiencies. Staff instructed CGE&Y to conduct the DUF testing because CGE&Y's previous testing was inadequate

⁸ The total inadequacy of the Qwest OSS at the beginning of testing can only be gleaned from a careful reading of the reports. For example, by identifying all the problems that were fixed, CGE&Y and Staff have also pointed out the inadequacies of Qwest's OSS. (OSS includes databases, systems and personnel.) See *Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan*, CC Docket No. 97-137, Memorandum Opinion and Order, FCC 97-298 (rel. Aug. 19, 1997), ¶134 ("Ameritech Michigan Order").

⁹ Staff Report (May 1, 2002), ¶¶ 19-26.

¹⁰ Master Test Plan for Testing Qwest's Operational Support System in Arizona, version 4.2, dated June 29, 2001 ("MTP").

¹¹ Cap Gemini Telecommunications 271 Test Standards, version 2.10, dated September 6, 2001 ("TSD").

OSS helps or hinders competition. Since important tests were not conducted, there are critical gaps in the Qwest case – a case that it has the burden to carry forward.

Consistent with “military style” testing, CGE&Y should be ordered to conduct the necessary tests; and, in the several cases where Qwest’s OSS is deficient, corrections should be made and retest verifications conducted.¹² The Final Report should be amended to explain and verify the results of successful retesting.

1. Pre-Order To Order Integration

a. CGE&Y Did Not Conduct The Required Evaluation Of Qwest Pre-Order To Order Integration

The ability of a CLEC to integrate data from Qwest pre-order responses into a Local Service Request (“LSR”), the order form, without having to translate or transform the data is critical to a CLEC using electronic interfaces, *i.e.*, EDI. When ordering requirements specify that data must be entered in a certain way, the pre-ordering information should be formatted in the same way so that the CLEC’s system can guide the pre-order information into the order without manual intervention. Qwest’s retail ordering system is highly integrated, as was demonstrated during the course of the Retail Parity Evaluation. The reason for making the testing requirements a part of the Functionality Test was to ensure that the Pseudo-CLEC operated the pre-ordering and ordering interfaces sufficiently to enable CGE&Y to form an opinion by witnessing the ways in which pre-order and order information could be linked between the two systems.

The MTP and TSD clearly require CGE&Y to conduct sufficient testing and evaluation to render an opinion on the extent to which pre-ordering information can be integrated with CLEC service requests. “The integration quality of pre-order and order data will also be evaluated during

¹² Staff correctly notes that the Test Advisory Group (“TAG”) adopted “military style” testing, or a “test until you pass” philosophy. Staff Report (May 1, 2002), ¶ 50. This approach or philosophy is embodied in the MTP and TSD.

was conducted that would resolve the unanswered question of how well pre-order information can be integrated into ordering requirements, *i.e.*, integration quality.

In its Final Report, CGE&Y subtly changes its assessment by stating that the integration quality is “sufficient”¹⁷ rather than satisfactory but, nonetheless, gives Qwest a passing grade. CGE&Y provides no distinction for the different choice of words.

Staff acknowledges the failure of CGE&Y to adequately evaluate the integration quality of the EDI interface and contends HPC’s Pre-Order to Order Integration Report adequately addresses the CLECs’ concerns.¹⁸ As AT&T points out in the next section of these comments, HPC’s assessment of the integrateability of Qwest pre-order to order EDI interfaces is exaggerated and not based on sufficient analysis to support the broad claims made.

b. Hewlett Packard Was Engaged To Perform The EDI Pre-Order To Order Integration Evaluation That CGE&Y Did Not Conduct

ACC Staff finally engaged the services of HP to conduct an evaluation of the integrateability of Qwest’s IMA Release 7 and IMA Release 9 interfaces.¹⁹ The results of that evaluation have been published as HP’s “PreOrder to Order Integration Report,” Version 5.0 (April 15, 2002). The Report concludes for IMA Release 7:

Therefore, HPC’s assessment is that CLECs can utilize Qwest’s EDI PreOrder transactions to automatically populate an Order with some data manipulation.²⁰

For IMA Release 9, HP makes an identical claim.²¹ HP’s conclusion on a CLEC’s ability to use pre-order query responses as direct input to order transactions is misleading.

¹⁷ CGE&Y Final Report of the Qwest OSS Test, version 2.0, dated March 29, 2002, § 2.1.4 (at 51) (“Final Report”).

¹⁸ Staff Report (May 1, 2002), ¶ 108(b).

¹⁹ Qwest’s IMA Release 7 and 9 pre-ordering and ordering interfaces are based on industry guidelines published by the Association for Telecommunications Industry Solutions (“ATIS”). The guidelines are Local Service Ordering Guidelines (“LSOG”) versions 3 and 5, respectively.

²⁰ Pre-Order to Order Integration Report at 7.

²¹ *Id.*, at 7-8.

facts simply do not support HP's broad claim of adequacy. The limited transaction/product sets that HPC evaluated are not claimed to have data elements that are consistent with the ordering requirements for transaction/product combinations, each of which have unique and specific ordering fields, entries and data requirements.

Third, HP did not determine whether the manipulations of data that it determined to be required would have resulted in orders that would be accepted by Qwest systems. It found no support from Qwest documentation of business rules that explain what reformatting is required for shortening or lengthening data structures to comport with ordering data specifications.²⁴ It did no research into the Qwest business rules that govern the placement of pre-order data into ordering fields; it could not because Qwest makes no such information available to CLECs.²⁵ A CLEC embarking on integration will have to subject its system design to trial-and-error processing through Qwest's systems before being able to achieve any level of integration.

Fourth, HP conducted a theoretical integration exercise. It did not integrate Qwest pre-order query responses into orders that were submitted to the Qwest OSS for this integration evaluation test,²⁶ nor did it integrate the data while it performed testing as the Pseudo-CLEC during the third-party test. As a result of this limited evaluation, HP cannot back up its integrateability claim with a showing that integrated order data is acceptable in Qwest's systems.

Lastly, HP sums up the integrateability evaluation with its findings that integration is a sizeable investment, over and above a CLEC's EDI investment, and that it can only be accomplished by first having clear and complete understanding of the Qwest interfaces.²⁷ The complexity of integration requirements would be significantly reduced by Qwest's provision of

²⁴ HP Ex. 10-3 Q/A 3.

²⁵ *See id.*, Q/A 4-7.

²⁶ *Id.*, Q/A 8.

²⁷ TR 19-20 and 43 (April. 17, 2002).

ordering inconsistencies similar to the way in which it defines pre-ordering inconsistencies in its report at section 4.2.1 at pages 21-24.

2. CGE&Y Did Not Prepare The Required Inventory Of Documentation

CGE&Y ignored the specific exit criterion that compels CGE&Y to produce an inventory of the Qwest documentation that it reviewed in the course of the Relationship Management Evaluation. Its testimony during the Relationship Management Evaluation workshop shows that it did not conform, and had no intention of conforming, to the exit criterion.

MR. BELLINGER: Let me -- is your question the listing of the documentation that they reviewed? Is that what you're looking for, John?

MR. FINNEGAN: My view of an inventory of documentation is here is the documentation we reviewed.

MR. BELLINGER: A listing? Is that what you're looking for?

MR. FINNEGAN: Yes, or URL. And if there's a version or date associated with that documentation, that would be included.

MR. BELLINGER: So do you all have a -- Cap, do you have a listing that he's suggesting that he's looking for?

MR. DRYZGULA: No, we do not.

MR. BELLINGER: Do you plan to develop one?

MR. DRYZGULA: No, we do not.³¹

The absence of any inventory of documentation in the Final Report shows that CGE&Y ignored the plain requirement of TSD, section 6.3.4 (c), to do so.

CGE&Y argued that keeping an inventory would be laborious and would need to be constantly revised due to the many changes in Qwest documentation that it experienced in the course of the test. The reason for the requiring inventory in the first place was a recognition that

³¹ TR 303 (Oct. 10, 2001).

tests of the bills received by the Pseudo-CLEC for UNE-P³⁵ products and services. The Pseudo-CLEC arranged to receive *detail* billing for resale and UNE-L³⁶ and *summary* billing for UNE-P. Its reasons for UNE-P summary billing are immaterial to the problem caused by such a request – the inability of CGE&Y to conduct the billing tests that are required to be conducted. Upon receiving the summary bill and finding that its tests were limited because of the absence of detail, CGE&Y should have required the Pseudo-CLEC to change its UNE-P billing preference to detailed billing. It did not. Billing tests that it alleges to have done on the basis of billing detail simply cannot have been accomplished because the billing data was summarized.

The result of its inaction is that no evaluation of the UNE-P usage billing was made³⁷ and no evaluation of the billing of recurring charges for UNE-P products and services was made. CGE&Y's testimony in the Functionality Test workshop is misleading as to the inclusion of UNE-P billing verification.³⁸ CGE&Y claims in its Final Report to have evaluated UNE-P bills. Indeed, it did some evaluation but it fails to note those evaluations that it did not (because it could not) perform.³⁹ As can be seen in AT&T's Confidential Attachment B, the UNE-P bills contain summarized volumes of services and their respective USOCs, but no summarized prices with which to calculate a unit price. Similarly, there are account summaries that reflect the recurring charges for all products and services for each account, but no USOC detail. CGE&Y had no

³⁵ UNE-P is a combination of loop, switching and transport unbundled network elements and essentially replicates local exchange service.

³⁶ UNE-L is an unbundled loop network element.

³⁷ CGE&Y Final Report, § 2.4.3 (at 101). "The usage for Resale accounts was validated in much the same way as UNE-P except that for the Resale accounts individual call records were on the invoice."

³⁸ TR at 308 – 310 (Aug 8, 2001).

³⁹ CGE&Y Final Report, § 2.4.3 (at 100) "Validation of the rates as provided in the ICA for the Pseudo-CLEC." *Id.* at 103. "To validate that the Pseudo-CLEC was billed correctly for recurring, non-recurring, and miscellaneous charges the appropriate bill items were reviewed." and "Based on the USOC, CGE&Y confirmed that the correct rates were applied and the charges were correct for: 1) Monthly recurring charges." These tests could not be done because the recurring UNE-P rates were not shown on the bills or invoices.

ordering, provisioning, and repair systems and functions. The CGE&Y rationale for retesting the provisioning of DUF should be more correctly described as “testing” that is required by the MTP and TSD, but had not been performed by CGE&Y during the Functionality Test.⁴³

4. CGE&Y Failed To Compare The Edit And Error Checking Processes

Section 4.1 of the TSD, version 2.10, requires CGE&Y to answer the question:

Are the edit and error checking capabilities available to CLECs using the IMA-GUI and EDI interfaces to create orders substantially the same to the capabilities of a Qwest customer service representative using the retail interfaces[?]

CGE&Y failed to answer this question in its Draft Final Report. Instead of evaluating the relative capabilities, as required by the TSD, CGE&Y only noted that “both sides had error-checking capabilities.”⁴⁴ CGE&Y did not evaluate whether the relative edit and error checking capabilities were the same. CGE&Y “*presumed* [the relative edit and error-checking capability] was the same.”⁴⁵ CGE&Y was required to complete an evaluation of the relative edit and error-checking capabilities available to CLECs and Qwest retail representatives.

Its testing of the edit and error checking capabilities occurred in November, 2001.

CGE&Y’s records show that it evaluated the edits and error messages for fourteen rejected CLEC-entered service requests. It concluded in its Draft Final Report, and subsequently concludes in its Final Report, that during the Retail Parity re-evaluation, the edit and error checking capabilities of IMA-GUI were sufficient for the resale representative to identify and correct any errors on a LSR.⁴⁶ This is not the testing that is required per the TSD and not the retesting that CGE&Y agreed to do.⁴⁷ The appropriate retesting would have required CGE&Y to evaluate the IMA, EDI,

⁴³ The results of the DUF testing are described in section B.5, *infra*.

⁴⁴ Draft Final Report at 386-387.

⁴⁵ TR 387, ll. 11-12 (Aug. 8, 2001) (emphasis added).

⁴⁶ Draft Final Report, § 3.1.4.3 (14); Final Report, § 3.1.4.3 (14).

⁴⁷ CGE&Y Retail Parity Proposed Re-Evaluation, dated October 26, 2001.

submitting the retail orders.”⁵⁰ Were this to be provable on the basis of CGE&Y actually having conducted the required retesting, the disparity between the Qwest retail and resale processing would be manifest in another way – Qwest’s systems reject CLEC orders for reasons that do not affect retail orders. No documents are contained in the CGE&Y Retail Parity Re-Evaluation records that support CGE&Y’s statement that there were no errors encountered in the retail portion of the edit and error-checking tests.

Staff provides no specific comment on CGE&Y’s inadequate testing of the edit and error-checking processes other than to sweep this specific and serious omission into its dismissal of the CLECs’ concerns. AT&T points out that the tests were not done in the Retail Parity Test and were not done adequately when CGE&Y got a second chance to get it right. Testing only the error outputs provided to CLECs and declaring them “clear and concise” is the extent of the discipline conducted by CGE&Y. No retail order rejections were examined; no comparison of retail error printouts versus those provided to CLECs was done. The Commission should direct an evaluation of the comparability of the retail versus CLEC edit and error-checking processes, since there is no basis upon which to rely on CGE&Y’s declarations.

5. CGE&Y Failed To Determine Whether Equivalent Capabilities Exist For Determining Order Status

Section 4.1.12, of the TSD requires CGE&Y to answer the following question:

Is substantially the same ability provided to both the Pseudo-CLEC Service Representative and the Qwest Service Representative to query status of a pending service order[?]⁵¹

CGE&Y fails to answer this question in its Final Report. Instead, CGE&Y noted that CLEC and Qwest customer service representatives both have the ability to query the status of a

⁵⁰ Final Report, § 3.1.4.3 (14).

⁵¹ TSD, § 4.1 (12).

6. **CGE&Y Failed To Determine Whether CLECs Can Expedite Due Dates In Manners Equivalent To Qwest Retail**

Section 4.1 of the TSD requires CGE&Y to answer the following question:

Is substantially the same opportunity provided to the Pseudo-CLEC Service Representative and the Qwest Service Representative to expedite due dates[?]⁵⁵

CGE&Y failed to answer this question in its Final Report. CGE&Y merely determined that a telephone call was required for both CLEC and Qwest customer service representatives in order to obtain expedited due dates. Although CGE&Y apparently concluded that both CLEC and Qwest customer service representatives must make a telephone call to request an expedited due date, that does not mean that substantially the *same treatment* is provided once the telephone call is responded to. CGE&Y made no findings or conclusions on the relative abilities to expedite a due date once a telephone call is made to the respective centers.⁵⁶

In its Retail Parity “re-evaluation,” CGE&Y issued EDI orders via the Pseudo-CLEC and also had IMA-GUI orders issued with requests for expedited due dates. Re-evaluation is a misnomer in this regard, because there was no expedite due date evaluation conducted in the Retail Parity Evaluation as CGE&Y testified in the Retail Parity Workshop.⁵⁷

MR. FINNEGAN: So consequently, there's no findings or conclusions on the relative abilities to expedite a due date once a phone call is made to the respective centers?

MR. DRYZGULA: I agree with your statement with the following caveat: However, that functionality will be tested, exercised, and reported on in the Functionality Test where appropriate.

⁵⁵ TSD, § 4.1 (8). See TSD, § 4.2 (8).

⁵⁶ TR 372-373 (Aug. 8, 2001).

⁵⁷ *Id.*

Staff incorrectly interprets AT&T's criticism of the ways in which CGE&Y evaluated the equivalence of the processes to expedite due dates in the retail parity re-evaluation. The expedite due date process cannot be shown to be nondiscriminatory if the process has not been tested. AT&T does not insist that equivalent numbers of due dates be verified, but it is required, according to the TSD, that the process be shown to provide comparable results to CLECs as are afforded to Qwest retail representatives.

7. **CGE&Y Failed To Interview CLECs To Obtain Commercial Experiences For Account Establishment And Account Management**

For the CLEC Account Establishment and CLEC Account Management Evaluations, both the Master Test Plan and the Test Standards Document identify two major activities that CGE&Y must complete as part of the overall evaluation of Qwest OSS. Those two activities are (1) reviewing Qwest documentation and (2) performing interviews with Qwest, Pseudo-CLEC and CLEC personnel.

The MTP identifies the following as one of the CLEC Account Establishment Evaluation activities:

*The Test Administrator will perform interviews with the Pseudo-CLEC, participating CLEC's and Qwest personnel to document the experiences encountered when establishing a new CLEC account.*⁶⁰

The TSD includes the following as one of the CLEC Account Establishment activities:

*The Test Administrator will perform interviews with the Pseudo-CLEC, participating CLECs and Qwest personnel to document the experiences encountered when establishing a new CLEC account.*⁶¹

The MTP identifies the following as one of the CLEC Account Management Evaluation Activities:

⁶⁰ MTP, § 7.2.1 (emphasis added).

⁶¹ TSD, § 6.2.3.3 (emphasis added).

management of the CICMP process. *Informal interviews were conducted from time to time with various CLECs, as well.*⁶⁴

During the workshops, CGE&Y confirmed that it did not perform interviews with CLECs for either the account establishment or account maintenance evaluations.⁶⁵ CGE&Y also confirmed during the workshop that, “it was our interpretation that it was acceptable and adequate to use for those CLECs who wanted to and opted to respond to take the written responses to our questionnaire as their position.”⁶⁶ Even when the questionnaire responses came back and were characterized by CGE&Y as “skimpy at best,” CGE&Y did not consider following the requirements of both the MTP and TSD by conducting formal interviews with the CLECs.⁶⁷

Both the TSD and the MTP directed CGE&Y to perform formal interviews with CLECs for a very good reason. Questionnaires cannot encompass all the issues nor capture the breadth of experience and knowledge of the CLEC personnel regarding account management. AT&T cautioned its operational employees that were filling out the questionnaire to not get overly concerned about the responses because there would be follow-up interviews.⁶⁸ Particularly with technical personnel, face-to-face interviews or interactive interview via the telephone can be much more informative than reading from questionnaire responses.⁶⁹ AT&T also contacted CGE&Y when AT&T did not receive a request by CGE&Y for a follow-up interview and was informed that AT&T would not be interviewed.⁷⁰ AT&T finds it disturbing that even when CGE&Y received CLEC questionnaire responses that it considered to be “skimpy,” it still did not see fit to follow the MTP and TSD and perform formal interviews with the CLECs.

⁶⁴ TR 17-18 (Oct. 9, 2001) (emphasis added).

⁶⁵ TR 104-105 (Oct. 9, 2001).

⁶⁶ TR 105 (Oct. 9, 2001).

⁶⁷ TR 107 (Oct. 9, 2001).

⁶⁸ TR 106-107 (Oct. 9, 2001).

⁶⁹ TR 100-101 (Oct. 9, 2001).

⁷⁰ TR 106-107 (Oct. 9, 2001).

the Pseudo-CLEC in the Document Viewing Room. There is an absence of any interviews with the Pseudo-CLEC in the CLEC Account Management Evaluation sections. In describing the Pseudo-CLEC experience, the Final Report states:

The summary below is based upon the following reports issued by HPC, the Pseudo-CLEC for the Arizona 271 evaluation:

- “CLEC 12-Step Process Report for 271 Test Generator” – Version 2.0
- “Help Desk Relationship Report for 271 Test Generator” – Version 3.0⁷⁵

CGE&Y appears to have only interviewed AT&T staff as part of the Electronic Interface Development Evaluation, yet there are twelve other CLECs in Arizona that have developed EDI interfaces. As part of the Interface Development Evaluation, the MTP states:

The Test Administrator will observe the processes for design and development of an EDI interface and the processes for design, development testing and implementing an IMA-GUI Interface to the Qwest OSS. *The Test Administrator will conduct interviews with Qwest, the Pseudo-CLEC, and CLEC personnel.* This will be a cooperative process to identify, discuss, and track OSS interface development and implementation activities in progress.⁷⁶

The Electronic Interface Development Evaluation section of the TSD states:

The TA will observe the processes for design, development, testing and implementation of EDI, EB-TA and Billing interfaces and the processes for acquiring and implementing an IMA-GUI Interface to the Qwest OSS. *The TA will conduct interviews with Qwest, Pseudo-CLEC, and CLEC personnel.* This will identify and track OSS interface development and implementation activities while they are in progress.⁷⁷

CGE&Y admitted during the RME workshops that there were no interviews with any CLEC personnel in its evaluation of Qwest's processes supporting CLEC interface development.⁷⁸

CGE&Y also admitted during the workshops that there were no formal interviews with any Pseudo-CLEC personnel in its evaluation of Qwest's processes supporting CLEC interface

⁷⁵ *Id.*, § 5.2.3 (at 352).

⁷⁶ MTP, § 7.2.4 (emphasis added).

⁷⁷ TSD, § 6.5.2.3 (emphasis added).

⁷⁸ TR 11, 11.7-11 (Oct. 10, 2001).

obviously chose to do a minimal effort to attempt to comply with the CLEC interview requirement, but its effort is transparent and self-serving.

In summary, CGE&Y failed to properly perform the CLEC Account Establishment, CLEC Account Management and Interface Development activities in that it performed formal interviews with a single CLEC. Were CGE&Y to have conducted CLEC interviews adequately and reported on those diligently, AT&T believes the conclusions that CGE&Y provides in its Final Report would be much different.

8. CGE&Y Interviewed A Single CLEC To Determine Its Experience In Developing An EDI Interface, Despite The Many Arizona EDI CLEC Users

One of the most complex and difficult interfaces for CLECs to establish with Qwest is the EDI interface through which CLECs submit orders to Qwest. The current versions of documentation necessary for CLECs to master in building the interface are comprised of thousands of pages of specifications, computer codes, and excruciating details that must be programmed by the CLEC. If any of the thousands and thousands of details are overlooked or misunderstood, the affected order types will not be successfully processed. In consideration of this complex task, the TSD calls for CGE&Y to interview CLECs to determine what their experiences have been in developing EDI interfaces. There are thirteen CLECs operating in Arizona that have developed EDI ordering interfaces. CGE&Y decided to interview only one and performed that interview two days prior to the publication of its Draft Final Report. AT&T was the sole interviewee; and, while the concerns that AT&T raised and the discussion points of the interview are represented in the CGE&Y evaluation, the point of requiring the interviews was so that the ACC had enough information upon which to base an opinion as to the adequacy of Qwest's documentation and the support provided by Qwest in the process. It is foolhardy for CGE&Y to rely on two pieces of data to make the sweeping statement that the Qwest EDI development process is adequate: the

9. **CGE&Y Failed To Examine Internal Qwest Practices And Procedures To Determine Their Adequacy For Supporting CLEC Relationships And Day-To-Day Activities**

The ways in which Qwest employees interact with CLECs is logically guided by process and procedure documentation, no differently than the ways process and procedure documentation guide Qwest personnel in their interactions with retail end users, prospective customers, and affiliated enterprises. These sorts of documentation are normally referred to as methods and procedures (“M&Ps”). CGE&Y conducted “process evaluations” in a number of areas, but stopped short of performing analyses of the internal Qwest processes that enable the CLEC to interact with Qwest.⁸⁴

CGE&Y evaluated the Account Establishment process as experienced by the Pseudo-CLEC. It evaluated the Account Management process on the same basis. It evaluated Qwest processes as experienced by the Pseudo-CLEC or as observed by its testing staff, but it failed to set a standard for those processes that is objective and meaningful.⁸⁵

CGE&Y did not evaluate the Qwest process documentation that enables cut-overs of unbundled loops, either on a coordinated (*e.g.* “hot-cut”) or non-coordinated basis. It did not evaluate the Qwest processes that instruct its technical staffs to perform pre-cutover dial-tone or ANI testing.⁸⁶ It did not evaluate the Qwest processes and procedures for answering calls at the various Qwest help desks.⁸⁷ It did not evaluate the Qwest processes that guide Account Managers in their activities in support of CLEC account establishment and management.⁸⁸ It did not evaluate

⁸⁴ CGE&Y Ex. 2-2, Q/A 23; TR 136-142 (Oct. 9, 2001).

⁸⁵ *Id.*

⁸⁶ CGE&Y Ex. 4-4, Q/A 70-73; TR 198-200 (Nov. 29, 2001).

⁸⁷ CGE&Y Ex. 2-2, Q/A 49; TR 261 (Oct. 9, 2001).

⁸⁸ CGE&Y Ex. 2-2, Q/A 63-68; TR 286-288 (Oct. 10, 2001).

part of this evaluation, *procedures to notify CLECs of planned and unplanned system downtime will be looked at.*" (Emphasis added.)

To verify the nature of the examinations of Qwest M&Ps conducted by CGE&Y, AT&T provided a series of questions to CGE&Y in the Relationship Management workshop to elicit the scope of its review.⁹¹ Each of these questions was asked to determine the scope of the evaluations for specific RME areas. The general purpose of AT&T's questions was to have CGE&Y identify the Qwest internal documentation that CGE&Y reviewed which support the specific test area. AT&T further asked CGE&Y to "[p]rovide the titles, versions, publication dates and sources if they are other than Qwest. If these are available on a Qwest web site, provide the URL."⁹² CGE&Y's testing of Qwest's processes and procedures was limited, by CGE&Y's unilateral decision, to the process documentation directing CLEC interactions with Qwest. It completely ignored its obligation to evaluate both sides of the process, by leaving the Qwest M&Ps out of the picture. Asked to explain this decision in the workshop, CGE&Y argued that those types of analyses are beyond the scope of its role as the third-party tester.

MR. CONNOLLY: How do you know what the account manager is supposed to do in the Qwest design of an account management function? How do you evaluate whether they're doing what they're supposed to do?

MR. DRYZGULA: ...We did not evaluate what they're supposed to do. We evaluated what they actually do on the basis of real experience from both the Pseudo-CLEC and the CLEC community that responded to our questionnaires.⁹³

MR. CONNOLLY: ...On AT&T's Question 49, we asked about the internal Qwest documentation that you looked at. Internal, by that, we mean those practices, procedures, and other sorts of documentation that Qwest personnel use in working at the wholesale systems help desk or managing people at the help desk...

. . .

⁹¹ See AT&T Exs. 2-1 and 2-2; CGE&Y Ex. 2-2, Q/As 23, 24, 49, 62, 72 and 106.

⁹² *Id.*

⁹³ TR 139 (Oct. 9, 2001).

the questions regarding the evaluation of the Qwest practices and procedures to determine whether the practices and procedures will be sustained when competitors interact with Qwest to establish CLEC accounts, manage CLEC accounts, and provision services to CLECs for their end users. There is a dearth of the necessary data because CGE&Y chose not to perform the necessary evaluations. It appears that Qwest did not refuse to provide the necessary documentation or that it denied access to its staff who could have explained and demonstrated its internal processes. CGE&Y failed to ask for these data, in conflict with the TSD and MTP requirements, to perform process and procedure reviews.

The Commission is left with the unanswered question as to the adequacy of the Qwest internal procedures that provide instructions for CLEC support activities.

Staff does not focus its comments on the issue of whether Qwest's employees are appropriately and adequately guided by sufficiently detailed and accurate process and procedure documentation such that their actions would be consistent during the OSS test and beyond, and for all CLECs, without discrimination. It concludes "the CLECs input was sufficient for the findings of the RME"⁹⁹ and that the CGE&Y retesting shows that the problem is resolved.¹⁰⁰ Staff fails to comprehend the nexus between documented procedures and the behavior of Qwest organizations in performing the necessary functions. AT&T contends that process results are not assured without documented M&Ps that are enforced through supervisory reviews and accountability. It is a time-tested theorem of operations management that documented procedures help to ensure consistency and repeatable performance in support functions. It is also well known and not disputed that undocumented and ill-defined procedures make operations unstable and create unpredictable results. CGE&Y and Staff appear to be satisfied by the "fact" that the Pseudo-

⁹⁹ Staff Report (May 1, 2002), ¶ 229.

¹⁰⁰ *Id.*, ¶ 232.

procedures, and other sorts of documentation that Qwest personnel use in working at the wholesale systems help desk or managing people at the help desk. And so that was our question about what were those documents that you examined.

MR. DRYZGULA: We examined no questions and no documentation in that regard.

MR. CONNOLLY: Did you ask for the documents and didn't get them?

MR. DRYZGULA: That's not the case.

MR. CONNOLLY: But weren't you looking at the help desk in terms of how does it function to support what CLECs need from that help desk, responsive, speed of answer and so forth was different. Process and subprocess areas. And so wouldn't you need to know how it works in order to evaluate how effective it is and the subprocess areas that are in [TSD] 6.3.2.2?

MR. DRYZGULA: I disagree. If that was the case, then we would be endeavoring into a continuous process improvement exercise rather than a 271 evaluation.

In the workshops held on the Draft Final Report, CGE&Y admitted that it had not evaluated the Help Desk documentation.¹⁰⁴ AT&T understands that Qwest employees rely upon such documentation, including methods and procedures, job aids, on-line references, etc., to perform Help Desk functions and that the Help Desk supervisory and management team use some forms of management practices and procedures in their role of managing that function. It is AT&T's understanding of the TSD that CGE&Y was required to review the Help Desk documentation to determine its clarity and sufficiency. Staff urged CGE&Y to include its review of the Help Desk documentation in its Final Report. CGE&Y provides no such information in its Final Report, and specifically not anywhere in Section 5, "Relationship Management," and the implication is that no evaluation of the Help Desk documentation was performed by CGE&Y. HP,

¹⁰⁴ TR 100-107 (Jan. 28, 2002).

Commission should demand that the Help Desk documentation be reviewed for comprehensiveness and cohesion with its own expectations for the first line of CLEC assistance with OSS problems.

11. CGE&Y Failed To Properly Evaluate CLEC Actual Experience In Receiving EDI Pre-Order Responses In Contrast To Qwest-Reported IRTM Results

CGE&Y was required to provide its analysis of the pre-ordering response times that were experienced by the Pseudo-CLEC using the Qwest interfaces to provide evidence of whether the IRTM technology provides a reflection of actual CLEC usage. CGE&Y does not meet this obligation in the Capacity Test, nor does it report on this issue in the Functionality Test.

In the Capacity Test, the Pseudo-CLEC recorded response times for pre-ordering queries made through the Qwest EDI interface by subtracting the date and time each transaction was sent from the date and time each transaction was received. The EDI results reflect a significant disparity between actual usage and IRTM-reported usage, with a general pattern of actual usage being considerably and consistently slower than reported by IRTM.

	EDI #		
Response Times (seconds)	Capacity# Test Result	IRTM* Result	% IRTM Under- reporting
Appointment Availability Query	5.91	5.86	.9 %
Address Validation Query	5.24	4.31	17.68 %
Customer Service Record Query	7.57	6.86	9.43 %
Facility Availability Query	12.58	14.67	-16.60 %
Loop Qualification Query	13.28	8.28	37.64 %
Service Availability Query	11.53	8.00	30.64 %
Telephone Number Availability Query	5.93	3.24	45.38 %

CGE&Y Confidential Supporting Documentation, CT01.xls

* CGE&Y Confidential Supporting Documentation, CT19, IRTMSummary8to7.xls

Using the raw data (before exclusions) from Qwest, the TA will perform an independent calculation of all measurements with a "Yes" indication in the MTP Appendix C and will also perform an independent calculation of the same measurements for the same orders using the Functionality Test Data provided by the Pseudo-CLEC.¹¹⁰

According to CGE&Y, it was unable to comply with these requirements for a variety of reasons, not the least of which is the absence of Pseudo-CLEC data that would be required for such recalculations. CGE&Y advised the parties of this "inability" in mid-2001, well after the bulk of Functionality Testing was completed, and in any case, months after it should have determined what data it required from the Qwest via the Pseudo-CLEC to fulfill the obligations. The failure of the TA to verify the Pseudo-CLEC was collecting or obtaining the data demonstrates noncompliance with an exit criteria for the OSS Test.

Section 3.7.5.5 Functionality Test, Ordering Exit Criteria (b), states: "The Pseudo-CLEC has provided the required data for each test script to the TA." Section 5.2.5, System Capacity test Exit Criteria (d), states: "All of the data associated with the System Capacity Test has been captured and retained by the Pseudo-CLEC." If these criteria have not been achieved, the Functionality Test is to continue and the Capacity Test run until the Pseudo-CLEC has provided all the necessary data to CGE&Y. In its Final Report, CGE&Y recognizes that it has deviated from the MTP and TSD requirements to recalculate the performance results. It also claims that data necessary to recalculate results were not *provided* to the Pseudo-CLEC. It is not clear what efforts, if any, were undertaken by CGE&Y or by the Pseudo-CLEC to acquire the data necessary to fulfill the obligation for the Pseudo-CLEC to provide the data to CGE&Y.

Section 8.5.3 of the MTP requires the calculation of the same performance measurements calculated from Qwest ad hoc data using independently gathered data to validate the ad hoc calculated results (see also Appendix C of the MTP). Exclusions for each performance measurement are defined in the PID; however, many of these are based on data elements not transmitted to the Pseudo-CLEC

¹¹⁰ TSD, § 7.3.4 (at 7-8).

Pseudo-CLEC). *Discrepancies in the calculations will be evaluated, documented and reported by the TA.*

*Problems discovered requiring work by Qwest, will be entered on Incident Work Order forms and forwarded to the TAG for subsequent prioritization and submittal to Qwest for repair.*¹¹⁴

From a review of section 2.5.4 of the Final Report, it appears that the BI-2 Invoices Delivered Within 10 days PID was the only PID where CGE&Y met its obligation to reconcile Pseudo-CLEC and ad hoc data. CGE&Y identified a problem in that Qwest was reporting 100% success in delivering invoices within 10 days and the Pseudo-CLEC results showed only a 92.56% success rate.¹¹⁵ CGE&Y identified the problem in AZIWO1211. CGE&Y concluded that Qwest's reporting of the Pseudo-CLEC's BI-2 results were inaccurate, recalculated Pseudo-CLEC results using Pseudo-CLEC raw data and closed the IWO. The problem with CGE&Y's approach is that it did not require Qwest to correct any BI-2 results that were affected by the problems it identified in the IWO.

Qwest's response to IWO1211 was essentially that it has been counting as an "invoice delivered within 10 days" those invoices for which it knew, through the receipt of a failed transmission notice, that, in fact, the CLEC did not receive the invoice. Only a monopoly would pat itself on the back for sending an invoice that it knew it was never received. Qwest should have been required to recalculate its prior BI-2 results counting as a miss any invoice for which Qwest received a failed transmission system notice and subsequently did not resend the file within the 10 day standard. Instead, the parties are left with inaccurate, Qwest BI-2 results for the entire CLEC community. These inaccurate results inflate Qwest's BI-2 results and make it look like Qwest's performance is better than it really is.

¹¹⁴ TSD, § 7.3.4 (at 7-8) (emphasis added).

¹¹⁵ Final Report, § 2.5.4 (at 186).

Between 3.3 and 5 minutes	15%
5 to 10 minutes	31%
10 to 20 minutes	25%
20 to 60 minutes	18%
Between 1 and 10 hours	10%
In excess of 10 hours	5%

The 200 second ceiling is not observed in Qwest's systems that provide the query responses to CLECs; it is limited to the measurement system. The imbalance is important to note because of the extreme consequence upon CLEC representatives that must wait extraordinary amounts of time to receive responses from Qwest's OSS.

Staff's EDI query measurement resolution describe in A. 11 will also serve to correct the impression that Qwest's system performs "time-out" activities when queries have been in its system unanswered for more than 200 seconds.

14. CGE&Y Failed To Maintain The Functionality Test Daily Logs

The TSD document provides specific reporting requirements for the TA, or CGE&Y.

The TA daily report will be updated at the end of each workday. It will include information from the daily log (Appendix D) regarding observations made during that day. The daily log will consist of the following fields:

- a) TA Tracking Number
- b) Purchase Order Number (PON)
- c) Process Area (Functionality)
- d) Process Sub-Area (e.g. UNE-P Residence)
- e) Transaction Media
- f) Date Submitted
- g) Date Completed
- h) Pending Status
- i) FOC Received Date
- j) SOC Received Date
- k) Expectations Met/Missed
- l) Comments

Logs according to AT&T's requirements.¹²¹ CGE&Y failed to implement the changes to reporting format despite the requests to make the changes and implement them.

CGE&Y failed to deliver the CLEC Daily Test Log reports on time and failed to deliver the information about the testing that it agreed to provide. Rather than providing each day's ordering transactions, CGE&Y provided the status of the last update to the LSR as of the end of the testing period being reported. This denied CLECs the requisite information to track the life cycle of an LSR, as the intervening transactions, including supplements, rejection notices, confirmation notices, and status changes, were not provided.

Staff and Qwest attempt to minimize the failure of CGE&Y to provide the Daily Logs. The failure to maintain the daily logs undermines the integrity of the entire Functionality Test. The Daily Logs were designed to be the method that CLECs would be able to monitor the progress of the testing, in an efficient and non-intrusive manner. Qwest was able to monitor the progress of the testing by whatever manner of monitoring it conducts, or chose to conduct during the course of the OSS Test. CLECs had no such visibility without the Daily Logs. AT&T complained throughout the conduct of the Functionality Test that its ability to analyze test results against its own experiences was being hampered by the absence of current information about the status of testing. The failure to maintain the daily logs undermines CGE&Y's findings and conclusions.

Staff wrongly advises that the form and content of the Daily Logs were provided to the CLECs according to CLEC needs.¹²² AT&T and WorldCom wrote to Staff and CGE&Y on March 25, 2001, asking for specific changes to be made to the CGE&Y format that was announced on March 16, 2001, in a TAG meeting. The changes were never implemented by

¹²¹ It should be noted that, at no time, was CGE&Y relieved of any obligation to comply with the TSD requirements regarding the daily logs.

¹²² Staff Report (May 1, 2002), ¶ 110(k).

15. **CGE&Y's Findings Of Retail Parity For Maintenance And Repair Functions Are Based On An OSS Interface That Has Not Existed For More Than A Year**

The evaluation of the equivalence of the processes to enter, track, test, and close trouble tickets compared Qwest's retail system access and that provided by the Qwest IMA GUI interface.¹²⁶ CGE&Y concludes, and Staff agrees, that the interfaces were shown to operate such that the test requirements stated in the TSD, sections 4.4 (e) 2 through 7 were observed. The IMA GUI for Maintenance and Repair functions was dismantled by Qwest in early 2001 and was replaced by Customer Electronic Maintenance and Repair ("CEMR") system,¹²⁷ and no retail parity testing was done with the CEMR system.¹²⁸ No testing of the EB-TA (application-to-application trouble ticket interface) was conducted for retail parity.

Staff makes the following conclusions: "The CEMR system was designed by Qwest specifically to handle CLEC M&R and to overcome problems that existed with the old IMA-GUI M&R system. The system provides access to Qwest *M&R basically in the same manner as for Qwest Retail systems* and therefore is "*almost parity*" by design both in *functionality and timeliness*. Testing of CEMR in the FT confirms that this is the case."¹²⁹ There is no evidence to support any part of Staff's conclusions that CEMR solved earlier-known shortcomings in IMA-GUI M&R. There is no evidence that CEMR provides similar access to M&R systems and databases as did IMA-GUI. And most assuredly there is no evidence that the Functionality Testing of CEMR produced facts necessary to reach such conclusions. Staff may hope that CEMR is an interface that provides parity of access to M&R functions, but there is no proof in the record that this has been achieved.

¹²⁶ Final Report, § 3.2.

¹²⁷ Staff incorrectly states that CEMR replaced EB-TA. Staff Report (May 1, 2002), ¶ 33.

¹²⁸ The TAG agreed that CEMR would not be subjected to retail parity testing.

¹²⁹ Staff Report (May 1, 2002), ¶ 154 (emphasis added).

of processing time for each CLEC transaction and that those that are issued via the Web-based GUI must traverse HTTP servers on the Qwest side and the CLEC side? Possibly.

Qwest would have the industry believe that its IMA design was planned to minimize the delays in processing time for the mediation steps. CGE&Y was to determine whether the IMA systems operate at parity with the Qwest systems used by retail representatives which would shed quantifiable light on whether the Qwest design introduces unfair amounts of delay into the processes of carrying CLEC transactions into and out of the Qwest legacy systems. CGE&Y found that Qwest's systems impose unfair amounts of delay and issued AZIWO1110 to report on that finding.¹³⁰ The Final Report shows that CGE&Y was concerned about the delays:

The substantial and statistically significant disparity which remains even after making the maximal possible adjustment for potential security validations and other consistent per-individual query differences between resale and retail pre-order query response timings was the subject of AZIWO1110.¹³¹

CGE&Y resolved its concerns by using data from the Retail Parity Re-evaluation that was conducted very differently from the original Retail Parity Evaluation. By changing the "rules" CGE&Y concluded that its original findings were incorrect. Instead of insisting that Qwest remove the inappropriate technology elements that impose "substantial and statistically significant disparity," CGE&Y opted to employ tests that avoided making the delays visible for evaluation¹³² and declares "that these timing differences do not negatively impact the customer

¹³⁰ AZIWO1110 "Analysis of the Phase 2 Retail Parity Evaluation indicates that, for the scenarios examined during Phase 2, total IMA-GUI PreOrder response times experienced by CLEC representatives are consistently longer than experienced by Qwest retail representatives. On average, the total scenario response time experienced by the CLEC representative is about 3 times as long as that experienced by the Retail representative. The difference is substantial and highly statistically significant. It is also pervasive across nearly all scenarios examined in the Phase 2 RPE."

¹³¹ Final Report at 215.

¹³² AZIWO1110 12/05/01 "CGE&Y captured pre-order response times mechanically (via the HP logger) and also manually during the re-evaluation for resale transactions. The mechanically captured response times include the time taken for pre-order queries to be sent to Qwest and returned to the Pseudo-CLEC. Manually captured timings include internal Pseudo-CLEC HTTP routing as explained in the third bullet of section 3.1.4.1.2 of the RPE report. For the purposes of AZIWO1110, and to make a fair comparison of the pre-order responses between resale and retail, CGE&Y relied heavily upon the mechanically collected response times as shown in the following figure."

must for equivalent orders, and it issued IWO 1111 to record its negative finding.¹³⁵ There was a single order type (out of 20) that required more work by a Qwest representative than a CLEC representative.

A CLEC representative who interacts with a residential end-user for placement of an order to establish new UNE-P service cannot perform the Qwest-mandated steps for GUI order placement as quickly or as efficiently as can a Qwest retail representative establishing basic residential service via the Qwest retail systems.¹³⁶ The upshot of this disparity is that Qwest has designed its OSS interface and GUI procedures to be more onerous for CLECs than the procedures necessary for its own representatives to effect orders for local services. Regardless that this fact is elicited only on the basis of an Arizona-unique test process, the fact remains the systems discriminate against CLEC users of the IMA GUI interface.

In its Re-evaluation, CGE&Y determines that the steps taken by the *CLEC representative* to prepare the order actually were not necessary because the Qwest system pre-populates a good number of the fields. This is absurd reasoning and a contradiction of the facts contained in the Document Viewing Room relative to the Retail Parity Evaluation test records. These records show that the Pseudo-CLEC representatives manually entered all the required data; there was no avoiding 85% of the manual entry requirements. The steps were taken by the CLEC representative because they are necessary to complete the processing of the order. CGE&Y may *wish* the steps were not necessary because the order fields should be pre-populated, but if that were the case, the number of data fields required that were actually filled out by the Pseudo-CLEC representative would be far fewer than were recorded in the Evaluation and Re-

¹³⁵ AZIWO 1111: "CGE&Y found disparity in the numbers of fields and steps required for a CLEC using IMA-GUI to complete an order (including pre-order steps) versus Qwest; the numbers of fields and steps were greater, across most scenarios, for CLECs."

¹³⁶ See IWOs 1110 and 1111.

The important issue is whether parity with retail operations for preparing and issuing orders has been proven by Qwest through this test. Clearly it has not. Staff states: “The average service order negotiation takes twenty to twenty five minutes or longer.”¹⁴¹ There is no evidence of this in the record on this test. How Staff came to establish this “process interval” should first of all be explained and documented with the study records and work papers from which it arises. The comment that the relatively quick responses time benchmarks have nominal consequence indicates a lack of Staff’s awareness of the details of the Retail Parity Evaluation. Pre-order queries, which are benchmarked for response time, are part of the overall process, but the order preparation processes are the source of the excessive amounts of time CLEC representatives have to spend in scrolling through order forms, entering the data according to Qwest specifications, paging forward to subsequent screens and more, are the burdensome and discriminatory effects of Qwest’s design.

Staff confuses the discrimination issue with its attempt to look at “customer perception” as a meaningful way to measure whether Qwest provides nondiscriminatory access. That is not a test that is required in the first case, and not one that has been conducted in the second. Moreover, while the Retail Parity Evaluation involved no customer perception studies or interviews, it is very clear that the differences in ordering processes have not been mitigated by Qwest’s OSS interface structure, processes, and technology. Such is the parity test. If the differences had been minimized by other means, the prospect of disparity in the most fundamental processes of interacting with end users to obtain ordering information would be less severe. Qwest’s design of its retail system could be modified to mitigate the differences in service representative handling of pre-ordering and ordering processes.¹⁴² However, CGE&Y

¹⁴¹ *Id.*, ¶ 159.

¹⁴² Staff Report (May 1, 2002), ¶ 131; Final Report at 198.

CGE&Y knows the reasons for this significant and systematic failure of Qwest's systems and operations to treat CLECs fairly in this regard. Firm Order Confirmations ("FOCs") are not firm and they are not confirmations.

AT&T Question: CGE&Y reports "During testing it was determined that FOCs are used by Qwest for purposes other than confirming the order." Describe the business purpose of a Firm Order Confirmation, according to CGE&Y's experience and expertise in local service ordering and provisioning.

CGE&Y Response: The business purpose of a FOC is to inform the CLEC that Qwest has received the LSR with sufficient information to begin processing the CLEC order.¹⁴⁴

CGE&Y issued AZ IWO2115 to record the fact that despite a newly-defined process and set of procedures that were to be used by Qwest to deal with CLEC orders, Qwest routinely misused order confirmations for purposes other than those intended and documented.¹⁴⁵ CGE&Y tries to make light of the poor practice that Qwest has engineered that provides anything but firm confirmations.

MR. CONNOLLY: ... What does Qwest's system mean with an FOC? And you indicate that it means that Qwest has received the LSR and has sufficient information to begin processing the CLEC order. You don't say that it is a confirmation that the services ordered would be provisioned according to the nature of the request and the due date on the request.

MR. DRYZGULA: Correct.¹⁴⁶

. . .

I've heard two formal definitions: one being firm order commitment, one being firm order confirmation. I like mine better, of course, which has already been said on the record, which is follow-on communication.¹⁴⁷

The Qwest order confirmation process was found to be so unreliable that orders were noticed to the CLEC as completed before orders were confirmed, completed without

¹⁴⁴ CGE&Y Ex. 4-5, Q/A 120.

¹⁴⁵ AZIWO2115 "Misuse of FOC - CGE&Y has observed multiple instances of misuse of the FOC communication method as described in Qwest's White Paper 'Firm Order Confirmation Evaluation Results' dated August 6, 2001."

¹⁴⁶ TR 234 (Nov. 28, 2001).

¹⁴⁷ TR 234 (Nov. 28, 2001).

nearly 20% of the IWOs, Qwest was able to satisfy CGE&Y that the problem will go away by training its staff to avoid making the mistakes that were found in the Functionality, Retail Parity, and Relationship Management tests.¹⁴⁹ Qwest, however, provides no long-term solution to the problems uncovered; it merely claims that re-training will suffice for resolution of the specific problem found by CGE&Y.

CGE&Y did not examine the revised Qwest training practices and never witnessed the training that Qwest provides to its service center personnel to validate whether the training is adequate for the work being done in the centers. Any conclusion that the problems found will go away is naive because there is no demonstration that the Qwest re-training will be any more effective than the original training provided by Qwest.¹⁵⁰

In the ROC third-party test, KPMG Consulting, the test manager (equivalently situated as CGE&Y for the Arizona test), became concerned with the frequency with which OSS process breakdowns were being “fixed” with “coaching” and “re-training.” It issued Observation 3086 to elevate this concern. “KPMG Consulting has identified a pattern in Qwest’s Observation and Exception responses that refer to the need for additional training and/or training enhancements.”

The Observation points out:

Qwest’s responses to 75 Observations and Exceptions, raised by both KPMG Consulting and Hewlett Packard Consulting (HPC), state that training initiatives and/or enhancements have been undertaken to remedy the issues raised. Of these 75 responses, 49 describe additional training measures that directly impact Interconnect Service Center (ISC) and Service Delivery Coordinator (SDC) personnel.

¹⁴⁹ AT&T’s calculations show that 32 IWOs were resolved by training. Staff’s Report documents 32 training updates. Staff Report (May 1, 2002), ¶ 54. CGE&Y’s Final Report shows 22 training opportunities; however, this number is inconsistent with Appendix B to the Final Report. Final Report, § 7.1 (at 453-454, App. B).

¹⁵⁰ As noted in A.9., *supra*, there was no evaluation by CGE&Y to determine whether Qwest personnel are following M&Ps, or even have M&Ps to follow.

monitor the effectiveness of manual order handling by Qwest. KMPG Consulting was also asked to comment on existing PIDs, or additional ones, that would strengthen the tools for monitoring manual order processing performance. KMPG Consulting PMG delivered its analysis to the Steering Committee on April 30, 2002, and to the ROC TAG on May 9. Attached as Attachment D is the "Manual Order Entry PID Adequacy Study" of KMPG Consulting in which it recommends further disaggregations of three existing PIDs to provide details of the consequences of manually processed orders and the addition of four new PIDs. The proposed new PIDs would report on accuracy and correctness in acknowledging receipt of LSRs, accuracy in confirming the orders, correctness of order due dates, and accuracy in issuing the orders. Qwest has not responded to the KPMG Consulting recommendations to AT&T's knowledge.

4. Qwest Has Designed Its OSS Interfaces So That Mass Market CLECs Will Face Additional Discriminatory Processes

For CLECs to enter the Arizona local market with plans for selling to broad segments of the market, OSS interfaces that utilize computer-to-computer applications are necessary. The other methods Qwest offers are unable to support the volumes of transactions that devolve from selling broadly to residential and small business customers. Faxing orders is not viable. Using the IMA GUI would mean that the CLEC has to enter the customer's order data twice -- once to its own system to record the ordering information and customer information, and the second time into the Qwest GUI to place the order with Qwest. No CLEC would choose and invest to do twice the ordering process work and try to compete on the basis of thousands of customers per month. The EDI interface that Qwest has designed causes CLECs to create pre-ordering and ordering processes that rely on serial, step-after-step, ways to extract the information from Qwest's system and then prepare the customer's order for submission. Qwest's retail system does not mandate the same steps for its orders. In addition, Qwest's EDI interface performs pre-

CLEC transaction processing was occurring while the Capacity Test volumes were being processed. The Functionality Test included more types of pre-order queries than did the specially-crafted transactions used in Capacity Testing. The fact is proven through both types of tests, however, that EDI CLECs suffer from slower responses to transaction queries that are processed in Qwest's OSS.

Query Type	EDI (seconds)	IMA (seconds)	% EDI Penalty
Appointment Availability	5.91	1.54	384%
Address Validation	5.24	3.9	134%
Customer Service Request	7.48	5.12	146%
Facility Availability	12.65	13	97%
Loop	13.27	9.76	136%
Service Availability	11.86	6.82	174%
Telephone Number Assignment	5.93	2.51	236%

It is not disputed that CLECs that want to compete in markets with thousands of potential customers require electronic interfaces that connect their OSS with Qwest's through the EDI interface. The web-GUI is designed for CLECs that can survive with entering their orders twice – once into the Qwest system and again into the CLEC system. The GUI users are advantaged because of the faster processing afforded their queries.

CGE&Y tries to explain away the disparate treatment CLECs receive, but fails to identify that the “EDI translation” steps account for any specific amount of the discrepancy between EDI and GUI queries: “Pseudo-CLEC EDI results [are] longer than the comparable GUI results because of the complex nature of the EDI transaction. Pre-Order transactions must first be mapped by the (sic) into EDI format then encrypted prior to transmittal, then be unencrypted at

5. Qwest's Wholesale Billing Systems Are, At Best, Uncertain Processes

In the Functionality Test, CGE&Y tested some of the outputs of the Qwest wholesale billing processes and some outputs of related processes. It claims in rather broad terms that its tests were thorough and complete, but they were not in several respects. Further, its tests of the usage records that are to reflect CLEC end user (via resale and UNE-P) calls made over the Qwest network, were haphazardly done, and Staff insisted that CGE&Y conduct those tests well after the Functionality Test was essentially completed. The inadequate testing that was ultimately performed by CGE&Y was occasioned by its failure to adhere to the MTP and TSD requirements. The delayed testing was necessitated by testing omissions and not by the claims made by CGE&Y.

CGE&Y's witnesses made it very clear that they did not have answers to AT&T's questions about how the billing tests were conducted and were generally unfamiliar with specific test requirements spelled out in the TSD while being questioned in the Functionality Test Workshop.¹⁵³ The Functionality Test was conducted from December 2000 to June 2001. According to Staff, 1567 orders were placed.¹⁵⁴ These orders that established UNE-P service to the Friendly Users should have been the basis for calls from interLATA points and calls to 800 toll-free points to generate ADUF records to the Pseudo-CLEC.¹⁵⁵ The Pseudo-CLEC received the first ADUF records from Qwest in August 2001¹⁵⁶ despite the fact that UNE-P Friendly

¹⁵³ See TR 296-297, 305, 319-320 (Nov. 28, 2001); TR 353 & 355 (Nov. 29, 2001).

¹⁵⁴ Staff Report (May 1, 2002), ¶ 86. See *id.*, Exhibit 3-6 for a breakdown of orders.

¹⁵⁵ <http://www.qwest.com/wholesale/clecs/duf.html> "DUF records can also include originating and terminating access records if you are set up as a UNE CLEC."

¹⁵⁶ The FCC included billing as one of the primary OSS function. A "BOC must demonstrate that it is providing equivalent access to billing information. Thus, the ability of a BOC to provide billing information necessary for a competitive LEC to bill for exchange access and termination of local traffic is an aspect of unbundled local switching." *Application of BellSouth Corporation, BellSouth Telecommunications, Inc. and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana*, CC Docket No. 98-121, Memorandum Opinion and Order, FCC 98-271 (rel. Oct. 13, 1998), ¶ 208.

The Functionality Test was designed to be an end-to-end test method that would provide continuity of test scenarios from pre-ordering queries through to billing. Orders for new services would be processed into Qwest's systems, confirmed, provisioned, and completed. Friendly end users would use those test services to place calls and receive calls according to the test scripts. Repair calls would be made to perform corrective actions on line faults, loss of dial-tone, and other scenarios called for in the Master Test Plan. Wholesale bills would be prepared for verification that provisioned services were billed properly, that calls were billed (and not billed where appropriate) and reconciliation of charges against account records would be accomplished.

MTP Section 3.3.1 Overview of the Functionality Test

Test cases developed for the Functionality Test will include end-to-end processing so that all functionality between pre-ordering and billing can be evaluated.

TSD Section 3.1 Scope at 3-2 and 3-3

The Functionality Test will also verify and validate the following:

Verify the ability of the CLEC participants or the Pseudo-CLEC to perform the necessary pre-order activities, to submit LSRs and ASRs through Qwest's OSS which must successfully provision and install the requested service or facilities (ASRs will not be provisioned) in an accurate and timely fashion. This includes the ability to track the progress of the LSRs and ASRs through these systems, install the service or facility, observe final order completion, verify the establishment of billing records, and verify the accuracy of call records against documented test calls.

* * *

Test scripts developed for the Functionality Test will include end-to-end processing so that all functionality from pre-order through billing can be evaluated for both urban and rural areas.

When CGE&Y did its first sets of billing tests, conducted concurrently with the other elements of Functionality Testing, it was able to track the flow of orders to bills; it could match calls made by Friendly users to bills; and it could make sure there was end-to-end continuity

certain circumstances.¹⁶² It did not verify that the charges for setting up the lines for the DUF test were correctly billed, and it did no verification of the calls on bills. CGE&Y's testimony in the April 17, 2002 Workshop confirms this omission:

MR. CONNOLLY: AT&T's Question 1 requests that Cap explain the process or processes that CGE&Y employed to verify that friendly test calls appeared on DUF files and were reflected in the CRIS bills. In the case that a different process or processes was used in the retesting of DUF provisioning, provide an explanation of that process.

MR. DRYZGULA: The process for both tests up through and including the verification of the DUF records were identical. The supplemental DUF test did not do bill verification.¹⁶³

In the second DUF test, another set of orders were issued (9 lines) and completed to establish a smaller panel of test lines for making and receiving calls between March 9 and March 17, 2002, via resale and UNE-P.¹⁶⁴ The ordering charges were not verified for billing, and call details on bills were not verified. The tester call logs were the basis for determining whether all of the call details were accounted for on the DUF files. They were not. CGE&Y tacked these additional deficiencies onto the unresolved, earlier IWOs where the same problems were encountered.

In the third DUF test, test calls for seven lines were made on April 2, 2002. DUF files were verified, and no bills were verified. The earlier reported problems got solved and CGE&Y closed the IWOs. Smaller test panels, fewer calls, and narrowed call types in the test series resulted in Qwest's systems providing the requisite DUF records to satisfy CGE&Y's lessened criteria.

¹⁶² IWO 1215 "Indicator 4 Wrong on UNE-P."

¹⁶³ TR 70-71 (April 17, 2002).

¹⁶⁴ AT&T conferred with the Staff and CGE&Y on the parameters for the second Supplemental test and encouraged that test to use the same number of lines as were used in the first; to verify call logs against DUF records and against billing details; to control the testing such that no other calls were in the test panel during the test period; and that all call types be tested, including calls placed through Qwest operator services. AT&T's advice was considered and with the exception of the size of the test panel, verifying billing, and operator-assisted calls, AT&T's suggestions were incorporated into the design of the second Supplemental DUF test.

on the DUF files and the bills. The negative testing is important to show that Qwest's processes do not send billing records for calls that were not made by the test lines.

CGE&Y's negative testing was done only in the second Supplemental DUF test, and the test provides inconclusive results because the volumes were too miniscule to make any reasoned judgment as to the reliability of the processes. The original testing of calls for billing verification was with the Friendly Users keeping records of the specific test calls made and CGE&Y checking DUFs and bills to see that the calls appeared on each. No negative testing was done, and as previously explained, the "positive" testing was haphazardly conducted, at best. In the first Supplemental DUF test no negative testing was done.¹⁶⁵

To conduct a proper test at this time, a test panel of fifty lines subscribed to resale and UNE-P services with varieties of vertical services, such as three-way calling, call blocking services, and incoming call screening should be assembled. These lines should make and receive scripted calls of the broadest profile of call types over a period of at least fifteen days that precede the Pseudo-CLEC's wholesale billing date for two consecutive months. Each day, the Qwest-supplied DUFs for originating calls and access calls should be examined to determine (a) that the call records are provisioned and (b) when they arrive relative to the call date. With each wholesale bill, all of the verified DUF records must be accounted for on either the bill for resale services or the bill for UNE-P services. Since no other calling would be made, the bills should show no other calls billed to the Pseudo-CLEC. While this is not an end-to-end test such as is called for in the MTP and the TSD, it at least a rigorous test that will determine the reliability of Qwest's Billing Functionality. Until a test of this type and scope is performed, the ACC will have no solid record of Qwest Billing Functionality.

¹⁶⁵ TR 25-29 (Feb. 25, 2002).

nor, importantly, to the FCC in its eventual section 271 review.¹⁶⁶ Likewise, this Commission deserves more; it deserves real proof of *actual* compliance, regardless of Qwest's desire to rush to the "271 finish line." If proof is lacking, it is because Qwest failed to begin addressing the inadequacies of its old change management process until July 2001.¹⁶⁷

1. Legal Standard

According to the FCC, the change management process refers to the methods and procedures that the Regional Bell Operating Company ("RBOC") employs to communicate with competing carriers regarding the performance of, and changes to, the RBOC's OSS.¹⁶⁸ Further, the FCC notes:

By showing that it adequately assists competing carriers to use available OSS functions, [an RBOC] provides evidence that it offers an efficient competitor a meaningful opportunity to compete. As part of this demonstration, the Commission will give substantial consideration to the existence of an adequate change management process and *evidence* that the [RBOC] *adhered to this process over time*.¹⁶⁹

Qwest, as it frequently asserts, has had a change management process (formerly known as CICMP) in place since 1999. What is missing from this statement, however, is Qwest's acknowledgement that its 1999 CICMP process was inefficient and essentially non-functional for actual use by CLECs. In fact, consistent with the *actual* evidence that the Joint CLECs proffered

¹⁶⁶ The FCC states "in order to gain in-region, interLATA entry, a BOC must support its application with actual evidence demonstrating its present compliance with the statutory conditions for entry, instead of prospective evidence that is contingent on future behavior. Thus, we must be able to make a determination based on the evidence in the record that a BOC has actually demonstrated compliance with the requirement of section 271." *Bell Atlantic New York Order*, ¶ 37.

¹⁶⁷ By failing to address the deficiencies in its change management process, Qwest was able to make all its changes without CLEC input or having to prioritize Qwest and CLEC-requested changes on a nondiscriminatory basis.

¹⁶⁸ *In the Matter of Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enter. Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania*, Memorandum Opinion and Order, CC Docket No. 01-138, FCC 01-269 (rel. Sept. 19, 2001), ¶ 41 ("Verizon PA 271 Order").

¹⁶⁹ *Joint Application by SBC Communications Inc., Southwestern Bell Tel. Co., and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to provide In-Region, InterLATA Services in Arkansas and Missouri*, Memorandum Opinion and Order, CC Docket No. 01-194, FCC 01-338 (rel. Nov. 16, 2001), ¶ 40 (emphasis added).

demonstrated in the Joint CLEC CMP Brief, Qwest has yet to demonstrate that the legal requirements for CMP have been met:

a. Qwest's Draft CMP Document Is Not Complete And Does Not Reflect The Entire CMP In A Single Document

Before a section 271 review of Qwest's CMP can properly be undertaken, Qwest must first have a complete CMP.¹⁷⁵ This does not yet exist. While the priority issues identified in Exhibit A to the Joint CLEC CMP Brief have been agreed to in concept, the language for each of these issues is not complete. Such language must be completed through further negotiations between Qwest and the CLECs and incorporated into the Draft CMP Document in order for this document to be considered complete for purposes of section 271 review. The fact that Qwest's CMP, once complete, may change further over time does not remove the need for Qwest to first establish a complete and compliant CMP.

b. CLECs Must Have Substantial Input In Design And Continued Operation Of CMP

It is true that since July 2001, CLECs have participated in a collaborative discussion with Qwest regarding the redesign of Qwest's CMP. However, the requirement that "competing carriers had substantial input in the design and continued operation of the change management process" cannot be met until the redesigned CMP is complete. In addition, the completed CMP must be observed for some period of time to determine whether CLECs have substantial input into the continued operation of the redesigned CMP.

¹⁷⁵ Joint CLEC Brief at 5-10.

e. Qwest's Standard Test Environment Is Inadequate

As part of the change management process, the FCC requires the RBOC to have a stand alone test environment.¹⁸⁰ Qwest has failed to establish a stand-alone test environment that is stable and mirrors the productions environment. AT&T addresses the tests performed in stand alone test environment at length in section D., *infra*.

3. Staff's Report

Staff concludes that Qwest's CMP meets the criteria set forth by the FCC, "with one important exception."¹⁸¹ The exception is that Qwest cannot "verify that Qwest has an established pattern of compliance and has adhered to this pattern over time."¹⁸² Staff further notes that Qwest has not demonstrated "that the instances of noncompliance raised by CLECs are the exception rather than the rule."¹⁸³ In other words, Staff has determined that Qwest does *not* meet the FCC's change management criteria.

To resolve this dilemma, Staff proposes that Qwest be required to file with the Commission a verification that demonstrates its compliance with Qwest's CMP. Staff suggests this would be strong evidence that Qwest is taking its obligations seriously and is consistently following its CMP.¹⁸⁴ Staff's proposal is inadequate. First, it is based on paper promises of future performance. The FCC has stated this is legally inadequate.¹⁸⁵

¹⁸⁰ Joint CLEC Brief at 22-33.

¹⁸¹ Staff Report (May 7, 2002), ¶ 82: *See also, id.*, ¶ 83.

¹⁸² *Id.*

¹⁸³ *Id.*, ¶ 83.

¹⁸⁴ *Id.*, ¶ 84.

¹⁸⁵ *Ameritech Michigan Order*, ¶ 55.

2. The SATE Does Not Mirror Production Processing

The FCC has been very clear that the testing that a CLEC performs on its electronic interfaces needs to provide evidence that production transactions modeled after the test transactions will be successfully processed. This is called “production mirror testing” in common usage.¹⁸⁶ Staff belittles the FCC’s requirements when it advises the Commission of the adequacy of the SATE in light of this major defect.¹⁸⁷

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.

The HP testing proves the SATE does not mirror production. KPMG Consulting testing in the ROC 271 test proves the SATE does not mirror production. As Staff correctly reports, the TAG will be resolving the ways in which production mirror testing will be demonstrated,¹⁸⁸ and AT&T respectfully recommends that the issue of whether Qwest has made sufficient progress in achieving the production mirror testing hallmark be decided based upon results *following* implementation of the new measurement process and compliance with the requirements contained in the impasse resolution of Phase IV testing on an existing or new release.¹⁸⁹ Until that data is available, it is incorrect to assert that the test environment has been shown to mirror

¹⁸⁶ “Production mirror testing” is the concept espoused by the New York Public Service Commission in the Bell Atlantic New York section 271 application. The U.S. Department of Justice and the FCC found that the testing environment which assures that CLEC test orders are processed with the same results as production orders demonstrates a production mirror testing environment. *See Bell Atlantic New York Order*, ¶ 109.

¹⁸⁷ Staff Report (May 7, 2002), ¶ 140.

¹⁸⁸ *Id.*, ¶ 143.

¹⁸⁹ *Id.* Staff agrees mirror testing is required *going forward* but concludes that it is not necessary for a finding that SATE mirrors production based on HP’s review of 28 transactions during testing of Releases 7.0. HP’s production mirror testing on Release 7.0 was inadequate to draw any such conclusion. In fact, HP found that the results of the production mirror testing on Release 7.0 were inconclusive. SATE Summary Evaluation Report For Qwest IMA-EDI SATE, version 3.0, dated December 21, 2001, § 6.6.3 (5) (“HP Report”); SATE New Release Test Summary Report 9.0 Transaction Test For Qwest IMA-EDI SATE, version 2.0, dated March 29, 2002, § 3.6.2.2 (“SATE 9.0 Report”). HP argues that that only one of the errors was due to EDI format and the rest were based on inconsistent behavior and content.

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.

AT&T further recommends that the definitions, descriptions, controls, and documentation be provided in a verified statement so the Commission will have the view of the parties to this proceeding as to the adequacy of the support complement of the SATE. Until these statements are provided, it is premature to assert that the SATE will provide CLECs with a reasonably constructed testing environment that meets the needs of its users. Staff correctly points out that enhancements such as this “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.”¹⁹²

5. Staff Goes Too Far In Its Findings That Qwest Currently Satisfies § 271 Requirements For The SATE

With the litany of requirements that Staff has imposed in its recommendations, it is surprising and disappointing that Staff recommends the Commission find the SATE acceptable for section 271 purposes.¹⁹³ It is too early for that. Qwest has not agreed to implement the Staff’s recommendations as provided in the Staff Report. It is unclear on the record what amount of time and resource Qwest will need to expend to implement any of the Staff recommendations, even if it agreed to implement them. It is unclear when Qwest would be able to deliver any of the well-intentioned and necessary documentation and filings called for in the Staff Report. Staff wants to advance the notion of the SATE being compliant with FCC requirements, but there is far too much uncertainty attached to that conclusion without any of the

¹⁹² Staff Report (May 7, 2002), ¶ 144.

¹⁹³ Staff’s finding of section 271 compliance regarding SATE is conditioned on Qwest’s agreement to implement the Staff’s recommendations. Staff Report (May 7, 2002), ¶ 144.

HP's testing was rigorous, but incomplete, failing to examine production mirror testing for SATE 9.0, failing to test the new VICKI feature, failing to test the new Real Time functionality, and failing to examine more than a small fraction of error conditions. Even though AT&T feels that the testing HP did do was rigorous, AT&T is extremely disappointed with HP's analysis of the test results. HP's portrayal of the test results minimizes the inadequacies in SATE. Furthermore, its overall assessment that SATE is "adequate" is not supported by the test results.

The FCC has not approved a BOC section 271 application that did not contain a stand-alone test environment that mirrors the production environment. The FCC also requires a stable testing environment.¹⁹⁵

"[P]rior to issuing a software release or upgrade, the BOC must provide a testing environment that mirrors the production environment in order for competing carriers to test a new release. If competing carriers are not given the opportunity to test new releases in a stable environment prior to implementation, they may be unable to process orders accurately and unable to process new customers services without delay."¹⁹⁶

The FCC noted that that "[a] stable testing environment means that no changes by the BOC are permitted after the testing period commences."¹⁹⁷

a. Testing Is Incomplete

HP conducted tests on SATE versions 7.0, 8.0 and 9.0. However, HP's testing was incomplete for several reasons. First, HP did not conduct production mirror testing of SATE 9.0.¹⁹⁸ Secondly, HP did not conduct a thorough evaluation of Business Process Layer ("BPL") error codes. Third, HP did not conduct any evaluation of Legacy system edits and error codes.

¹⁹⁵ *Bell Atlantic New York Order*, ¶ 109.

¹⁹⁶ *Id.*

¹⁹⁷ *Id.*, n. 301.

¹⁹⁸ HP, based on Qwest comments, decided that production mirror testing should not be included in the testing based on PID PO-19 after HP had decided to use PO-19 as the basis for new release testing of SATE 9.0. Both of these points are disputed by CLECs, who were not consulted in the decisions.

CLECs did not raise any objections to Production Mirror Testing being included in SATE 9.0 testing. CLECs did not file written comment on the test plan, as they believed that this part of the test was to be included. AT&T, for one, believed the plan had been adopted by HP because Phase I testing was already complete.²⁰² AT&T and other CLECs were very surprised to later find out that HP had decided not to do Phase IV testing based on Qwest's comments filed after the call, without making any attempt to obtain the CLECs' input or opinion on the scope of PO-19.

The rationale that HP uses to omit Phase IV testing is based on Qwest's interpretation of PO-19 and Qwest's interpretation of the CLECs positions during discussions of PO-19 at the ROC and TAG. Mr. Connolly, a consultant representing AT&T at both the ROC and TAG during discussions of PO-19, testified in the Arizona workshop on April 18, 2002, that Qwest's interpretation of the CLECs' position of PO-19 was incorrect.²⁰³ Whether production likeness or production mirror testing is part of PO-19 is irrelevant, in any event, because CLECs never had any input into whether the scope of test should be limited to PO-19. Since the parties never agreed that production likeness testing was not necessary, it does not matter if this type of testing is included in PO-19. The only thing that is clear is that HP had planned to do four phases of testing for SATE 9.0, including Production Mirror Testing, the CLECs relied on HP's test plan, and HP subsequently decided after testing was well underway to cancel Phase IV testing. SATE 9.0 testing remains incomplete since Production Mirror Testing was cancelled.²⁰⁴

²⁰² See TR 154-158 (April 18, 2002) for AT&T's position on the sequence of events.

²⁰³ TR. 160-167 (April 18, 2002). Essentially, AT&T may have agreed to the language of the PID, but "how the baseline transactions are established for each release, how the test transactions are gathered and processed within the SATE in order to determine whether we've got what are called successful transactions and successful transactions" had not been agreed to. TR. 162 (April 18, 2002).

²⁰⁴ It is worth noting that HP advised Qwest in late April 2002 that it would take approximately 30 days to do Phase IV testing. It is now May 2002, Phase IV testing was not done and the CLECs are arguing that it should have been done. Had HP simply conducted the test or immediately sought resolution of the issue by bringing the issue to the TAG, the issue would be moot. However, HP took it upon itself to not do Phase IV testing. AT&T's insistence that

and the CLECs have been unable to get a listing from Qwest for error codes that are sent by the Legacy Systems that sit behind the BPL and which the BPL simply passes through to the CLEC.

The Final Report for SATE 7.0 and 8.0 shows that HP conducted a set of 65 negative test scenarios. Unexpected results were initially discovered with 12 of the 65 scenarios. This is a very high error rate of over 18%. This, however, is the tip of the iceberg. Of the 65 scenarios, 35 were run on SATE 8.0, with an error rate of 20%; and 30 were run on SATE 7.0, with an error rate of 17%.²⁰⁸ The list of error codes for the 8.0 BPL contains 2,423 entries. If we assume that HP tested one error code per scenario, which is generous, then HP would need to run 2,423 scenarios to test all of the error codes, instead of the 35 scenarios that were run. This means that HP tested a little less than 1.5% of all error codes. If the 20% error rate holds, this means that if complete testing were done, one could expect another 477 errors to be uncovered. AT&T is not suggesting that all possible error codes should be tested. However, testing only 1.5% of the BPL error codes is not a large enough sample. Testing of BPL error codes is clearly incomplete.

iii. Lack Of Testing For Back Office Legacy System Edits And Error Codes

SATE uses a simulation of the back office legacy systems for SATE. HP describes SATE in its report:

The SATE does not use live production systems for test transactions. Instead, it uses a front-end, IMA EDI that is identical to the corresponding production interfaces, and a “stubbed” environment to simulate the back-end, legacy systems. ...

The impact of the SATE’s simulation of back-end systems, is that Qwest has an additional responsibility to ensure the synchronization of SATE test results to make certain that CLECs receive responses to transactions that are indeed the same responses that would be received from production systems. This is particularly important if test transactions produce behavior that is different than production systems, as the nature of the behavior cannot be anticipated and planned for in advance.²⁰⁹

²⁰⁸ HP Report, § 5.5 (at 26).

²⁰⁹ *Id.*, § 2.0 (at 7).

v. Failure To Test Real Time Capability

Qwest introduced a limited flow through testing capability coincident with the release of the 9.0 production release.²¹³ The feature has not, however, been tested by any third party. Given the importance this feature will play in CLEC testing, it is essential that it be given a full system test.

vi. Inconsistent Responses During Multiple Release Testing

HP has discovered some inconsistencies between releases 7.0 and 8.0. This issue has not been fully explored in the HP testing, and HP has listed the results as Inconclusive:

HP has determined that the evaluation of this criterion remains Inconclusive. HP identified that most of the error message variances found relate to the incidence of legacy system errors that are not included on the production error list, and messages that present LSR FORM and SECTION Headers. Additionally, HP found occurrences of error messages being generated in SATE that were not equivalent to what was published on the error lists. HP ran 30 scenarios, of which 11 scenarios successfully matched and 19 scenarios did not match. See the Transaction Test Reporting Summary for further details.²¹⁴

Clearly, the HP testing revealed some significant inconsistencies that need to be explored. SATE 9.0 testing did not examine these issues.

vii. Volume Capacity Testing

Qwest has not tested SATE's ability to handle any specific level of volume.²¹⁵ It is unknown how SATE would handle multiple CLECs and interface developers processing multiple orders at once. While SATE is not meant to be a load testing vehicle, some amount of load should be tested to see if SATE will hold up when multiple CLECs, with several developers each, test during a new release.

²¹³ The nature of this capability will be discussed below.

²¹⁴ HP Report, § 6.6.3(6).

²¹⁵ *Id.*, § 6.6.4 (2). "HP did not perform volume capacity testing."

Qwest must include these items in SATE, and HP must then test them before SATE can be deemed acceptable in Arizona. SATE is currently inadequate in addressing CLEC needs.

HP recommends that: “Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.”²¹⁷ Later, in this same section, “HP also recommends that Qwest obtain input from the CLECS to determine the full suite of products that shall be included in the SATE.”²¹⁸ In the matrix entitled “Overall Transaction Test Evaluation Findings Summary,” HP further clarifies the lack of completeness of SATE:

Are the scenarios supported in the SATE inclusive of the products and activities that are required to support the business processes of a CLEC operations center?
This **Inconclusive** result is based on the most recently delivered SATE Data Documents. All products are not offered in SATE when compared to the products found available in the IMA EDI Network Disclosure documentation. HP recommends that Qwest obtain input from CLECs to determine the full suite of products that shall be included in SATE.²¹⁹

CLECs need all of the products and features that can be ordered using the production system to be available in SATE.

It is insufficient to base SATE products on only those that are currently being used by CLECs in Arizona. Before a CLEC offers a new product to retail customers it needs to test its ordering and provisioning systems with SATE. A retrospective look at what products are currently being sold has no bearing on the new products that CLECs would like to test and sell. Failure to include all products inhibits introduction of additional services by the CLEC.

KPMG has evaluated SATE for the ROC. KPMG was also concerned that not all products can be tested with SATE. KPMG stated its concerns in Exception 3095. Its concerns have not been resolved.

²¹⁷ *Id.*, § 2.2(1).

²¹⁸ *Id.*, § 2.2(5).

²¹⁹ *Id.*, § 6.6.3(7).

that must be addressed by Qwest. VICKI does not support “real world scenario testing.” KPMG addressed this concern in Exception 3077:

With the implementation of VICKI, KPMG Consulting acknowledged that Qwest provided CLECs with a method for receiving automated responses, but noted that VICKI had certain limitations. One of the identified issues was that VICKI does not support “real world scenario testing.” Without this capability, KPMG Consulting does not believe that VICKI provides CLECs an understanding of how different types of transactions will react in the production environment. Although VICKI helps CLECs to understand the EDI mapping structure and to determine if their systems can accept certain types of responses for the orders submitted, by design, it does not support complete interface testing capabilities. KPMG Consulting considers the real world scenario testing an essential element to a complete EDI testing environment.

iii. Limited Flow Through Testing Capability

Flow through is a very important part of the OSS production interface. SATE has only recently provided any kind of flow through capability. However, as implemented, the flow through capability that Qwest is now providing is inadequate. On February 22, 2002, Qwest provided flow through test capability for POT and UNE-P POTs orders that originate in its Western Region states. Qwest has said that flow through test capability will be available for the remaining services in the Western Region and for all services in its other regions by May 20, 2002. In ROC Exception 3077, KPMG stated that because there is no flow through in SATE, “it does believe that the current test environment provides a CLEC with an accurate representation of the production environment.”²²¹

iv. Tariff-Based USOC And Geography Edits

Qwest is assuming a general type of CLEC without any state tariffed-based USOCs or geographical edits, which would occur in the production environment.

²²¹ ROC Exception 3077 -- Disposition Report at 4.

with the FCC's requirements.²²⁵ A review of the SATE 9.0 Report fails to find any discussion of this evaluation criteria. This is not surprising, because Qwest failed miserably with respect to the adequacy and stability of the data documents.

Qwest released version 9.01 on January 21, 2002, and version 9.07 on February 25, 2002. In all, Qwest released 7 versions of the SATE data documents between January 21 and February 25.²²⁶ This reflects a complete failure to maintain documentation stability. The FCC has stated that "[a] stable testing environment means that no changes by the BOC are permitted after the testing period commences."²²⁷ Qwest fails this requirement without question.

CLECs requested that Qwest be held to 98% accuracy for SATE. Qwest argued that accuracy should be 95%.²²⁸ HP's testing shows that SATE 9.0 did not meet either criteria. HP's report shows that Phase I test results for SATE 9.0 were 92.91%.²²⁹ This is well below the 95% mark. In Phase II testing, the results were even worse, at 86.07%. Phase III testing is a stability test, as it reflects the errors after errors discovered in Phase I were corrected by Qwest. Surprisingly, this test resulted in 94.62% accuracy, still lower than 95%.

It is questionable as to whether Phase III results should be used in any accuracy calculation, since Qwest was given time to repair errors that were found in the initial testing. However, the true number of errors for Phase I testing are higher than HP is reporting. In the

²²⁵ *Bell Atlantic New York Order*, ¶ 109.

²²⁶ HPC 10-6, Q/A 26. Actually Qwest released 8 versions, excluding version 9.01. This included 2 versions of 9.04 and 9.05. Version 9.04a was necessary for HP to do additional testing. Version 9.05 was due to be released. This version had major changes and would have made HP's evaluation more problematic.

²²⁷ *Bell Atlantic New York Order*, ¶ 109, n. 301.

²²⁸ Staff resolved the impasse by adopting a 95% average standard for the 3 most recent releases. This standard is under evaluation because the stability of previous releases allows the most recent release to have a high rate of errors. It is likely the new PID will require at least a 95% accuracy rate for the new release.

²²⁹ SATE 9.0 Report, Table 5 (at 23).

With Phase I testing showing 91.73% accuracy (at best) and Phase II results at 86.07%, and with the need to release 7 versions of the data document, SATE 9.0 fails to qualify as a viable release.

d. SATE 7.0 And 8.0 Failed Initial Release Testing

The transaction testing results clearly show that the initial versions that HP tested were extremely problematic and that many problems still remain in SATE. Testing of SATE 7.0 had an initial error rate of 25%.²³³ SATE 8.0 had an initial failure rate of 23%.²³⁴ In negative testing of SATE 7.0, the error rate was 16%; and for SATE 8.0 it was 20%, although as discussed earlier, HP tested only 1.5% of the BPL error codes and none of the Legacy System error codes.²³⁵ These are very high rates of error and signify a system that is still in development and should not be trusted for use by CLECs. Most of these problems are rated as medium severity.²³⁶

HP found the following types of errors:

- Invalid test data
- Outcome of scenarios incorrect
- Business rules for SATE not consistent with the production environment
- Production error messages can not be reproduced or reproduced inaccurately
- Results of SATE scenarios do not match with results of production

The very high error rate in initial SATE releases is extremely detrimental to the purpose of SATE, which is to provide CLECs with a stable means of testing their OSS before entering the

²³³ HP Report, §§ 2.1.3 and 5.5.

²³⁴ *Id.*, § 5.5.

²³⁵ *Id.*

²³⁶ The criteria for high severity had been set so stringently that AT&T was not surprised that no software error was assigned a high severity.

not yet evaluated Qwest's technical support for SATE, as Qwest has not established guidelines that can be used.²⁴²

f. Simulation Of Legacy Systems

One of the most troubling aspects of the current implementation of SATE is the fact that SATE simulates the back end legacy systems. SATE uses a copy of the IMA-EDI interface, but uses a simulation of the legacy systems that provide the actual order processing and response in the production systems. Qwest has called this simulation a "stubbing" system, an analogy from cable systems where a branch cable may be "stubbed" instead of going to the actual destination. SATE uses a software simulation of the legacy systems with built in "canned" data that simulates Customer Service Record ("CSR") and facility information. The challenge with a simulation is to assure that the simulation captures all of the necessary functions of the real legacy systems, and to make sure that the functions that are captured are accurately simulated. CLECs will be depending on SATE for accurate representations of order and response activity that the CLEC OSS will see when working with the production systems.

Other incumbent local exchange carriers, such as BellSouth, chose approaches that actually use the legacy systems as part of the test environment. However, a good simulator can be used as a test environment. AT&T's concern is that SATE, which has been put together very quickly, does not adequately represent the legacy systems. There are two aspects that must be evaluated. First, the simulator must correctly handle all of the correct inputs that it is given. This means that SATE should give correct responses to orders that are correctly submitted. Second, the simulator must correctly handle all of the *incorrect* inputs that can reasonably be

²⁴² *Id.*, § 5.3.

HP is also concluded that SATE does not capture BPL and back-office errors that may be caused by LSR data entry mistakes:

This **Unsatisfactory** result reflects an evaluation of the outcomes received when processing LSR's through the SATE for Release 7.0 and 8.0. Both the Regression and Progression environments were included in this evaluation. When utilizing a small sampling of the SATE account data from the scenarios provided, HP realized a 20% Error rate when the expected results are compared to the actual results. HP prepared LSR's to induce fatal errors. The fatal error generation was pre-determined by analysis of the published production Error List. Specific error messages were selected and the LSR's were built to cause that error to occur. When these LSR's were executed in SATE there were unexpected results. The unexpected results fall into one of the following categories:

- Planned error did not occur
- Planned error message content did not match the error list
- Error message received is not on the published production Error List²⁴⁵

HP further elaborated its concern regarding the accuracy with which SATE simulates the back end systems and warned of unsatisfactory results:

As HP evaluated the variances in expected responses to actual responses it became evident that there may be a difference between the listed error messages in the Production Error Lists and the actual error messages generated by the SATE Business Process Layer edits.

This **Unsatisfactory** rating is the result of the establishment of three formal issue documents 2005, 2018 and 2002. Through the investigation of these formal issues it has been documented that the existing production error lists that support IMA-EDI need to be updated to eliminate error messages that are obsolete within the IMA application. Additionally, Qwest has established a timeline for the issuance of error list publication and the corresponding change summaries. The revised production error lists and their change summaries are due to be published with the implementation of release 9.1 sometime in February. HP can not evaluate the success or failure of these processes due to its future implementation.

There are additional concerns supporting this unsatisfactory evaluation as it became evident that there are Legacy system edits which cause error responses to be generated. These Legacy system error messages are not incorporated into the Production Error list, nor are they part of any published SATE documentation. HP documented this in formal issue 2005. Qwest responded to this observation by developing a comprehensive description of legacy system errors, which they incorporated into the 8.01 V3 production error lists. This description was prepared per HP's request, in lieu of Qwest providing

²⁴⁵ *Id.*, 6.6.3(2).

g. HP Has Presented A Flawed Analysis

HP analysis in its SATE 9.0 Report is obviously flawed. HP, in general, did an adequate job of testing the features and functions of SATE that it choose to test. A review of the deficiencies of the test set were given above. In analyzing the results, reaching its conclusions and creating the reports, HP always gave the benefit of the doubt to Qwest, and where there was little doubt of inadequacy, presented the results in a manner to put a positive spin on them.

HP minimized the number of errors that it counted and that it used to calculate percentages of errors in the SATE 9.0 Report. In the workshop in Arizona on April 18, HP admitted that two errors that were found in Phase III testing should have been detected in Phase I testing and counted as errors.²⁵¹ HP subsequently released an update version of its Final Report that did not correct Table 5 that had been admitted as an exhibit at the workshop. HP should have corrected the error list, all tables that included the calculations for errors and the text in which they discuss the results of the test. None of this was done.

There was a third error that HP detected in Phase III testing that should have been counted in Phase I results. When conducting test LQQ3 during Phase I, HP incorrectly implemented the test. In Phase III, HP detected an error and Qwest subsequently amended the data document to fix the problem. HP has now come back to with an explanation that basically says that Qwest should not have been held to such a high standard for the implementation of industry rules. However, even if this is a minor error, it must be counted in the results. There is no severity associated with an error; an error is an error. LQQ3 may be a minor error but it should be counted.

²⁵¹ Specifically, these two tests were Phase I, tests AAQ7 and AVQ9.

categories, they should have made the denominator for each calculation appropriate for that category. This methodology converts the 86% success rate in Table 5 into 98%, 98% and 93%, respectively, for the three categories.

After adopting a standard of 95%, HP gave Qwest an “acceptable” rating even though Qwest failed this standard. HP gave the “acceptable” rating even though HP knew that the success rate of Phase I tests was only 93% (excluding all errors in releases 9.02 and 9.03) and the success rate of Phase II was 86%, at best. HP characterized the difference between 5% errors and 7% errors as small, when in fact, the difference is 40%. If the additional errors are added, the phase one testing goes to 92% and the difference in error rate is 5% versus 8%. This is a full 60% difference. HP should not pretend that Qwest missed the mark by a small percentage.

h. Summary

It is clear to AT&T that additional testing is needed to assure SATE is ready for reliable service. VICKI and the real time capability should be thoroughly tested. Due to the high error rate of initial SATE releases, testing of new features and functions should be done by a third party until new SATE releases prove to be more reliable.

SATE is not a production-ready system. The current SATE implementation is, at best, a beta test version that CLECs should use with caution. There are still inconsistencies between SATE and the production system that can give CLECs incorrect results. More troubling is the fact that only 1.5% of BPL error codes have been tested and no legacy system edits and error messages have been tested. The implication of this is that the responses of SATE cannot be verified as accurate, inaccurate, or not existent. The fact that several CLECs have been using SATE is not persuasive. The ROC exception submitted by KPMG was based on less than adequate experiences by CLECs. CLECs who are currently using SATE are using a flawed and

4. VICKI enhancement for post-order processing should be completely tested,
5. Additional commonly used products in SATE such as Line Splitting and Loop Splitting should be implemented and tested, and
6. Flow through capability for SATE should be completely tested,
7. HP should correct calculation errors and remove all biased analysis from their final report, and
8. SATE release 10.0 should be tested by a third party. Qwest should be required to have an independent third-party test of SATE releases until the initial error rate for a new release is below 5%, as measured by an unbiased, third party.

Until these recommendations are adopted and implemented, the Commission cannot find that SATE mirrors the production environment.

E. Comments On The Liberty Audit Supporting Data Reconciliation

Staff provides an adequate description of the background for the additional audit on data reconciliation that Liberty Consulting Group (“Liberty”) performed and reported on in December, 2001.²⁵⁸ AT&T raised a number of concerns discussed and not discussed in the Arizona Report in its January 18, 2002 Brief, that AT&T incorporates by reference for the sake of brevity. In addition to the previously raised concerns, it is important that the Commission understand what has transpired in later audit work done by Liberty in related data reconciliation audits conducted for other states. Since the January Brief, audits have been completed for Nebraska (January 28, 2002), Washington (March 2, 2002), Oregon (March 28, 2002), Utah, and Minnesota.²⁵⁹

AT&T’s Brief noted that the problems found in the second state audit (Colorado) were not found in Arizona and opined that the reasons for that was the inclusion of the line sharing

²⁵⁸ Report on Qwest Performance Measure Data Reconciliation for Arizona (“Arizona Report”) December 3, 2001.

²⁵⁹ The final report contains the specific findings for Utah and Minnesota. *Id.* at 5.

AT&T believes if Liberty's fundamental approach were changed so that CLECs could make a good-faith showing of the discrepancies believed to exist in the Qwest results, and the burden was placed on Qwest to show its data are *accurate*, more discrepancies would be revealed. Any future audits should recognize that CLECs can identify apparent discrepancies but cannot make the showing of data that proves Qwest's data are inaccurate. There is at the least, incongruity between Liberty's stated Objectives and its method of determining which purported inaccuracies should be investigated:

Liberty's Objective: Does any of the information provided by the participating CLECs or Qwest demonstrate inaccuracy in Qwest's reporting of performance results under the measures defined in the PID?

Liberty's Method: Therefore, in the case of data discrepancies, Liberty required an affirmative showing of a Qwest error or omission before issuing an exception or observation

Liberty inappropriately shifted the burden of proof to the CLECs.²⁶²

At least half of the Liberty-reported findings were found to be caused by human error.²⁶³ This is a type of problem that the Commission should insist be avoided by improving the extent to which Qwest's processes and procedures for performance measurements are mechanized. Qwest does not provide ongoing information as to the number of PIDs that have manual processing components, but the last time it reported on its sample of 62 metrics and disaggregations, more than 66% are manually collected and calculated, more than 75% are manually loaded for reporting and in excess of 87% are manually reported.²⁶⁴ Qwest should be required to report regularly on the extent that it has mechanized the four key functions of PID reporting and produce a documented, public plan to increase the level of mechanization.

²⁶² *Ameritech Michigan Order*, ¶ 44: "We emphasize, however, that the BOC applicant retains at all times the ultimate burden of proof that its application satisfies section 271."

²⁶³ Staff Report (May 1, 2002), ¶ 258.

²⁶⁴ Qwest report of manual versus mechanized PID calculations, January, 2001

Staff recommends the Commission adopt this recommendation,²⁶⁶ and AT&T agrees that it should. The Commission should order a date-certain implementation for this process change so that Qwest has a clear picture of the priority that the Commission places on this recommendation and so that the CMP recognizes this as a Regulatory Change.

2. **CGE&Y Recommends That Qwest Explore The Inclusion Of Additional Edits Of CLEC LSRs, Within The Business Process Layer (BPL) Of The Gateway Systems, Prior To Issuance Of A FOC**

This recommendation is circular on one hand and contradictory on another. CGE&Y would have Qwest expand its gateway edits so that CLEC LSRs are subject to more stringent and tighter form, format, and content disciplines than are currently applied. Tighter edits means more rejects. More rejects means fewer LSRs flow through to the service order processor. Flow through percentages might increase, but for fewer orders. However, the processes that generate FOCs are independent of those that have any effect on flow through of CLEC LSRs.

LSR flow through is achieved when CLEC orders are processed into Qwest's service order processor without manual intervention. Rejected orders do not contribute to the calculation of success – neither the denominator nor the numerator of the specific performance measure dealing with flow through, PO-2, is influenced by rejected orders. A CLEC order must be accepted in Qwest's system to be included in the PO-2 denominators. CGE&Y's recommendation does not consider this fact.

LSRs that cannot pass Qwest's gateway screening would cause more of them to be stopped at the gateway, rejected to the CLEC, and require CLEC representatives to locate the cause of the error and correct it for re-submission. A given LSR might eventually flow through, but the Qwest gantlet of edits and validation processes must be passed before the request is

²⁶⁶ Staff Report (May 1, 2002), ¶ 234.

3. **CGE&Y Recommends That When Qwest Introduces A New Product Or Service That Could Impact A CLEC Account, That The Appropriate OSS And Process Changes Are Communicated To The Appropriate Qwest Departments Or Workcenters**

CGE&Y's suggestion, endorsed by Staff,²⁶⁸ is not identified as to the cause for concern that new product or service information is not introduced to "appropriate Qwest Departments or Work centers." While the suggestion sounds like a good idea, CGE&Y's rationale for making this a suggestion that the Commission should act upon needs to be explained. It is a very broad recommendation and one that could have impact on CLEC information flows through the CMP Product and Process system, unless more information is put forth by Staff.

Qwest tried to gain insight into the recommendation and was rebuffed by CGE&Y in the Draft Final Report workshop.

Qwest Question: Please identify references, if any, in the detailed section of the report to the recommendations or otherwise identify linkages, if any, between the recommendations and the detailed report itself.

CGE&Y Response: The recommendations are based on experience and observations made by CGE&Y during the testing.²⁶⁹

Staff may think this is a good band-wagon to jump on , but AT&T would like to know what specific product introduction changes CGE&Y wants Qwest to implement. The concern is that such changes could delay the otherwise orderly implementation of product and process changes to such an extent that CLECs are delayed in obtaining information from Qwest.

²⁶⁸ *Id.*, ¶ 234.

²⁶⁹ CGE&Y Ex. 8-4, Q/A 7.

attempt CSR retrievals within days proximate to order completion. This problem also has been raised in ROC testing.

Qwest has not changed the timing of its CSR record updating process. A “work-around” is performed by each CLEC that receives the notice that a CSR update has not been made when the CLEC’s new customer wants to have supplemental changes made or to order new services or features. That work-around, while suitable for small numbers of orders, simply fails to solve the underlying problem that CGE&Y indicates, and AT&T agrees, needs to be resolved.

In addition to the problems caused that can be “worked-around” the problems of tardy record updates as they affect trouble ticket entries are of significant concern. The Commission should require Qwest to effect the system changes to make CSR updates occur no later than the day after order completion. Until it implements this change, a CLEC that attempts to issue a trouble ticket through EB-TA or through CEMR and comes across a late CSR update should be provided immediate access to appropriately trained Qwest staff that can issue the trouble ticket on behalf of the CLEC. Since it is Qwest’s tardy update process that is at fault, it is wrong to perpetuate the problem into customer service functions such as trouble ticket issuance.

5. CGE&Y Recommends That The CMP Consider The Following Process Improvements

- Qwest provide the CLECs with a complete listing of the services and features on any CLEC-initiated order, as entered in Qwest’s Service Order Processor (SOP).
- Explore and develop an automated process that would allow CLECs to view the status of service orders initiated by Qwest on CLEC owned accounts.
- Continue to improve the Service Interval Guide (SIG) to provide clearer and more detailed information for CLECs on disconnect intervals, and to make the information easier to locate on the Qwest wholesale website.

As the Qwest CMP has evolved through negotiations between CLECs and Qwest, it provides for entertaining Change Requests that would effect the changes recommended by

CGE&Y comments in its Description of the Incident: “The existence of stable, unchanging requirements is an absolute pre-requisite to CLECs being able to code their own systems to match Qwest’s.” It appears to have raised its concern as a system developer/user that believed that the lack of an adequate interval would imperil interface development projects that have date-specific completion deadlines, but suffer from having critical design documentation in a fluid state far too late in the game. When it reviews the Qwest response to IWO1078, CGE&Y for some reason backs off its recommendation.

Because of the collaborative nature of the re-design process CGE&Y expects that whatever decision is reached as to the timeliness of EDI documentation releases will have been accepted by the majority of the CLEC community.²⁷³

Regardless of the CGE&Y backsliding, the CLECs and Qwest did arrive at an acceptable interval during the negotiations on the redesign CMP.

Since the agreement has already been reached on the number of days prior to implementation that Qwest must provide the EDI design documentation, the Commission need not concern itself with this recommendation.

7. **CGE&Y Recommends That Qwest Update Their Wholesale Website With Clear Standards And Business Rules Pertaining To CLECs Use Of The FOC**

CGE&Y experienced significant problems with Qwest’s Firm Order Confirmation process, alternately dubbing it “Follow-On Communication,” since a Qwest-issued FOC is not a confirmation or a commitment. Qwest responded to these IWOs with explanations of how its processes and procedures worked and under what circumstances and some indications of the situations where other processes would serve to over-ride the normal processes. CGE&Y’s approach in analyzing Qwest’s practices was not to examine of Qwest’s methods and procedures (these were available to CGE&Y as the Test Administrator but are not available to CLECs) but

²⁷³ AZ IWO 1078 Performance Acceptance Certificate.

No systematic analysis of Qwest's practices was undertaken. No verification that the changed sequences of edits and validations were incorporated into the work processes of the Qwest service centers was done. No verification that the service center staff were adequately retrained to avoid making the mistakes that caused the original problems was attempted.

CGE&Y cites the IWOs as resolved and then highlights the Qwest FOC process as requiring documentation and explanation so that the problematic results of the order confirmation process are at least placed into perspective. CGE&Y makes note of the August 6, 2001 "Firm Order Confirmation Evaluation Results" documentation published by Qwest in its recommendation²⁷⁴ and fails to insist that the processes described within the documentation be brought up-to-date and kept current..

8. Staff Concurs In The CGE&Y Recommendation That Qwest Improve The Process For CLECs To Reserve Large Blocks Of TNs; However, The Recommendation Is Inadequate

Section 4.2.6, version 2.10, of the TSD requires that CGE&Y complete the following activity:

The ability to request a large block of TNs, in the same serving area, will be compared between a Qwest Service Representative and a Pseudo-CLEC Service Representative. The number of steps required, the amount of information required and returned, and the timeliness of response will be measured. Performance of the paired test scripts will be coordinated to within 1 minute of each other for this particular comparison.²⁷⁵

CGE&Y failed to complete this activity by the time it had issued its interim Final Report on Retail Parity. CGE&Y only noted that when requesting large blocks of telephone numbers ("TNs"), both CLECs and Qwest had to use a manual process.²⁷⁶ CGE&Y failed to compare, as

²⁷⁴ Final Report at 28.

²⁷⁵ TSD, § 4.2 (6).

²⁷⁶ TR 304, ll. 11-16 (Aug. 8, 2001).

receive the reserved numbers during the course of the call placed to the separate Qwest work centers. It found that in each case of the CLEC activities, the representative was placed on hold for extended periods of time. The Qwest representatives received the reservations nearly three times faster than did the Pseudo-CLECs' representatives. When CGE&Y evaluated the experiences to obtain additional TNs for existing end users, the disparities were far greater. CLEC representatives cannot receive the reserved numbers during the contact, because Qwest sends them by fax afterwards. The Qwest representative receives the TNs during the call placed to the Qwest work center. The amount of time the Pseudo-CLEC representative was on hold exceeded the amount of time that the Qwest representatives took to actually receive the reserved numbers. The time for the Pseudo-CLEC to receive the reserved numbers by fax took additional time. The whole process for the Pseudo-CLEC ranged from 23 minutes to one hour and 10 minutes as contrasted with the retail experience of 11 minutes.²⁸⁰ Qwest provides its representatives the abilities to expand an existing, large customer's telephone number coverage from two to six times faster than it provides to a CLEC.

CGE&Y ignores the obvious disparate treatment afforded to CLECs and answers "Yes"²⁸¹ to the TSD question: "Is the procedure used to reserve large blocks of TNs substantially the same for both a Pseudo-CLEC Service Representative and a Qwest Service Representative?"²⁸² The testing requirements for this issue are clearly stated in the TSD. CGE&Y failed to test appropriately.

²⁸⁰ Final Report, § 3.1.4.3 (6) (at 238).

²⁸¹ *Id.*

²⁸² TSD, § 4.1.(6).

and process and the FCC's nondiscriminatory requirements. Paper promises of future performance are not sufficient.

III. CONCLUSION

AT&T has pointed out a significant number of inadequacies in testing and test results. CGE&Y makes a number of recommendations that are essentially excuses for not addressing and rectifying problems with Qwest's OSS through the IWO process and in conformity with military style testing during the test. A number of findings made by Staff on Qwest's section 271 compliance are conditioned on Qwest agreeing to Staff's recommendations. The FCC has made it clear that promises of future compliance are not sufficient for making a finding of section 271 compliance.

AT&T believes many of the problems are a result of an attitude by CGE&Y that the test planning had gone on long enough, the test must be started and the test must be completed at top speed. AT&T could list numerous examples that support this perception. However, AT&T believes its comments justify its perception and document that many of the inadequacies in testing and test results are a result of the desire to complete the test.

As AT&T noted at the onset, there were a number of reasons the test took as long as it did. Time and effort alone do not justify concluding that Qwest's OSS meet the requirement imposed by the FCC. AT&T trusts the Commission will give its utmost attention to the concerns raised by it in its Comments and judge them on their merits. AT&T believes that the Commission will arrive at the only possible conclusion -- Qwest's OSS are inadequate and fail to comply with the Act and the FCC's requirements.

Attachment A

Federal Communications Commission
Washington, D.C. 20554

September 27, 1999

Nancy E. Lubamersky
Executive Director
Regulatory Planning
U S WEST
11 Upper Ardmore Road
Larkspur, CA 94939

Dear Ms. Lubamersky:

During the course of the last several weeks, members of the Common Carrier Bureau's Policy and Program Planning Division ("Division") have met with representatives from U S WEST to discuss third-party testing of operations support systems ("OSS") and the competitive local exchange carriers ("CLECs") access to those systems. The Commission has previously indicated that for a Bell Operating Company ("BOC") to obtain approval under section 271 of the Telecommunications Act of 1996 to provide in-region, interLATA services, it must demonstrate that it provides to CLECs nondiscriminatory access to its OSS and that its systems are operationally ready and capable of handling reasonably foreseeable demand. A number of companies, including yours, have undertaken or are developing independent third party tests of their OSS.

The purpose of the discussions between Division staff and interested parties has been to provide guidance on important elements that a third-party test should include to assist our determination that a BOC is providing nondiscriminatory access to its OSS. These views represent the current thinking of the Common Carrier Bureau and are in no way binding on the Commission. Any final determination concerning whether a BOC is providing nondiscriminatory access to its OSS will be made based upon the record in a section 271 application. It is my hope, however, that the Bureau's views on these issues will be helpful to you and other Bell Operating Companies in formulating successful section 271 applications.

1. Performance Measure Evaluation

A thorough and well-documented independent assessment of the data collection and calculation processes for performance data will considerably facilitate the Commission's review of a section 271 application. An independent review of the performance measurements is crucial in determining the accuracy and validity of performance data. In particular, the staff believes that such an independent review would include the following qualitative and quantitative aspects.

elements would be indicative, but not dispositive, of a satisfactory change management process and should be evaluated by the independent third-party:

- CLEC Participation: CLECs would have a role in the development of, and modifications to, the change management process.
- Release Implementation: Prior to issuing a new software release or upgrade, the BOC would provide a testing environment that mirrors the production environment in order for CLECs to test the documentation for the new release. The testing environment would be stable (*i.e.*, no changes by the BOC), and would be maintained for an adequate time-period, at least 30 days, for the CLECs to test. To ensure CLECs are not forced to cut over to a new release prematurely, a BOC could adopt a "Go/No Go" vote process to decide whether to implement a new release. Pursuant to this process the new release is delayed if a majority, such as two-thirds, of eligible CLECs vote to delay the release. Similarly, a BOC could maintain a pre-existing version, or versions, of the interface (*e.g.*, Electronic Data Interchange) when issuing a new release rather than switching directly from one version to the next.
- Memorialization of Process: The change management process would be clearly memorialized and set forth in one document that can be readily accessed by the CLECs. Any modifications to the change management process would be included with this document.
- Dispute Resolution: There would be a dispute resolution process for change management that is separate and apart from any process that is set forth in interconnection agreements. This would provide CLECs a forum specifically designated to resolve any change management disputes.

3. xDSL Testing

The third-party test would test significant volumes of xDSL orders (*i.e.*, xDSL capable loops).

4. Normal, High, and Stress Volume Testing

- Normal and High Volume Testing: The third-party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems.² The mix of transactions would replicate expected CLEC

² An incumbent LEC's internal ordering system permits its retail service representatives to submit retail customer orders electronically, directly into the ordering system. This is known as "flow-through." Similarly, a competing carrier's orders "flow through" if they are transmitted electronically (*i.e.*, with no manual intervention) through the gateway into the incumbent LEC's ordering systems. Order flow-through applies solely to the OSS ordering function, not the OSS provisioning system. In other words, order flow-through measures only how the competing carrier's order is transmitted to the incumbent's back office ordering system, not how the incumbent ultimately completes that order. Electronically processed service

- Functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions. The transaction mix should replicate CLEC ordering patterns and include, for instance, orders that fall out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (*i.e.*, orders should be actually provisioned), as applicable.

This letter is intended to provide a summary of staff views regarding key elements of a third-party test which could assist our determination that a BOC's OSS is operationally ready and capable of efficiently supporting ever-increasing volumes of transactions. It is not, however, intended to be an exhaustive list of the necessary elements for a successful third-party test. Moreover, it is possible that additional issues will be raised by interested parties in future section 271 dockets. I emphasize that any final determinations regarding whether a BOC is providing nondiscriminatory access to its OSS will be made by the Commission based on the record of the BOC's 271 application for a particular state. To this end, Bureau staff is committed to working with all parties to ensure that the section 271 application process is as orderly and predictable as possible.

For information purposes, a copy of this letter will be placed in CC Docket No. 98-121³ and CC Docket No. 98-56.⁴

Sincerely,

Lawrence E. Strickling, Chief
Common Carrier Bureau

³ Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order, 13 FCC Rcd 20599 (1998).

⁴ Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

Attachment B

Attachment B

Qwest's UNE-P Bills

Confidential Material

Filed Under Seal

Attachment C

WSNCT2001

Centrex Form:Station Details Section 18:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 19:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 20:LTC required when ACT is N, V, or Z

Appointment required and/or APTCON field must be populated.

Informational message: Order was saved (PENDING status), not submitted and will be purged in 30 days

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Informational

CONFIDENTIAL WSNCT 2001

Messages:

Save successful...

Purge date is 2001/12/13.

LSR ID is 3464264.

LSR Form:Admin Section:AGAUTH required when ACT is N, W, V or Z

LSR Form:Admin Section:AGAUTH must be Y when ACT is N, W, V or Z

LSR Form:Admin Section:LST required when ACT is N, V or C

Centrex Form:Admin Section:CB required for ACT of N, V, Z, C, or T

Centrex Form:Station Details Section 1:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 2:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 3:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 4:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 5:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 6:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 7:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 8:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 9:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 10:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 11:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 12:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 13:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 14:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 15:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 16:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 17:LTC required when ACT is N, V, or Z

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WSNCT2002

ACT is N, V, or Z

Centrex Form:Station Details Section 17:LTC required when

ACT is N, V, or Z

Centrex Form:Station Details Section 18:LTC required when

ACT is N, V, or Z

Centrex Form:Station Details Section 19:LTC required when

ACT is N, V, or Z

Centrex Form:Station Details Section 20:LTC required when

ACT is N, V, or Z

Appointment required and/or APTCON field must be populated.

Informational message: Order was saved (PENDING status), not submitted and will be purged in 30 days

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Informational

Messages:

Save successful...

Purge date is 2001/12/13.

LSR ID is 3464008.

LSR Form:Admin Section:LST required when ACT is N, V or C

LSR Form:Bill Section:BAN1 invalid format

Centrex Form:Admin Section:CB required for ACT of N, V, Z, C, or T

Centrex Form:Station Details Section 1:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 1:IWJK Section 1:IWJQ must be between 1 and 99

Centrex Form:Station Details Section 2:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 3:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 4:The PIC/LPIC fields MUST contain either a four digit numeric code (place zeros in front of all non-four digit codes to make them four digits), or the word "None", or "DFLT"

Centrex Form:Station Details Section 4:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 5:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 6:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 7:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 8:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 9:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 10:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 11:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 12:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 13:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 14:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 15:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 16:LTC required when

Attachment D

**Qwest Manual Order Entry
Performance Indicator Description
Adequacy Study**

 ***KPMG Consulting***

April 30, 2002

wishes of the Steering Committee. The opinions expressed herein do not constitute statements of fact, and do not carry the weight of findings such as those contained in our Final Report on the ROC OSS test.

Approach

KPMG Consulting used the following approach to accomplish the objectives of this study

- Identify the interactions and communications between Qwest and the CLEC for manually handled orders;
- Identify the aspects of those interactions and communications that would be impacted by rep errors;
- Determine what types of performance measures would reflect the impact on CLECs of errors made by reps;
- Determine whether or not existing or proposed measures cover these potential measures; and
- Determine what changes to existing measures, or additional measures, if any, might be appropriate.

In thinking about our approach, KPMG Consulting also made the determination that the primary focus of this review should be on the manual order entry aspects of the manual order process, to the exclusion of downstream activities such as provisioning that are not unique to manually handled orders.

Opinion

Below we present our professional opinion by discussing the timeliness and accuracy aspects of manual order handling. By timeliness we mean either the timely transmission of the response to the CLEC, or the timely performance of activities by Qwest. By accuracy we mean either that the response is well formed, per the business rules, with no fields or field values missing, incorrect or superfluous, or that the activity performed by Qwest was done according to specifications.

In some cases, we also comment on the minimum level of disaggregation in reporting that we deem appropriate.

Because KPMG Consulting did not conduct the Metrics Audit for the ROC OSS test, we express no opinion on whether or not existing measures, as implemented, actually accomplish their objective as stated in the PID.

Functional Acknowledgements

There are currently no performance measures for timeliness or accuracy of Functional Acknowledgements of manually submitted orders. In our opinion, it is important that a CLEC receive positive acknowledgement from Qwest of the receipt of all orders so that there is no question as to whether or not Qwest is

Timeliness

The current performance measure PO5 seems to address timeliness of FOCs. KPMG Consulting has no additional suggestions for this measure, or its levels of disaggregation.

Accuracy

Other than the fields required to match the FOC with the LSR (e.g., PON), FOCs do not contain any information of significance except for the committed due date. Therefore, KPMG Consulting does not believe that any measures for FOC accuracy are required. See our opinion below for our comments on due date issues.

Due Dates

CLECs request due dates on orders submitted to Qwest. Qwest communicates committed due dates back to CLECs in the body of FOCs, and subsequently amends those expectations, when required, through subsequent notifiers.

It is KPMG Consulting's opinion that errors made by reps in entering order information can result in orders not being fulfilled on time. At the same time, KPMG Consulting recognizes that other Qwest personnel can make errors, and that these errors may also result in the order not being fulfilled on time. Indeed, both types of errors can compound one another.

KPMG Consulting also recognizes that it is not possible for a CLEC or regulator to determine the root cause of Qwest's failure to meet the due date committed to in the FOC. Neither is it possible for a CLEC or regulator to determine, for manually handled orders, whether or not some or all of the reason for a delay was caused by a rep error.

Nevertheless, KPMG Consulting believes that monitoring due date performance by Qwest, with levels of disaggregation that reflect the previously discussed three alternative paths to manual order handling, is of utmost importance. Accordingly KPMG Consulting makes the following recommendations with respect to due dates:

Timeliness

CLECs set customer expectations for due dates based upon the dates returned by Qwest in the FOC. The timeliness of service delivery is very important if CLECs are to maintain satisfactory relationships with their customers.

OP3 (Installation Commitments Met) and OP4 (Average Installation Interval) currently measure different aspects of the timeliness of service delivery. The measures disaggregate by "product," and by dispatches within/without MSA and no dispatch. KPMG Consulting recommends that additional levels of disaggregation be reported for these two measures that reflect the following three categories: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Summary

In summary, KPMG Consulting proposes the following:

- Change PIDS OP-3, OP-4 and OP-15 to add disaggregations for:
 - Manually submitted orders;
 - Electronically submitted orders that fall out; and
 - Electronic submitted orders that flow through.
- Define new PIDS for:
 - Functional Acknowledgements of manually submitted orders;
 - Accuracy of LSR Rejection Notices;
 - Conformance of FOC due dates with the SIG; and
 - Service Order Accuracy.

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of the public version of **AT&T's Comments on OSS Test Reports and Staff's Supplemental Reports on Checklist Item 2 (OSS)**, Docket No. T-00000A-97-0238 were sent by overnight delivery on May 16, 2002 to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and a true and correct copy was sent by overnight delivery on May 16, 2002 to:

Maureen Scott *
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Mark A. DiNunzio *
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Ernest Johnson *
Director - Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Christopher Kempley *
Arizona Corporation Commission
Legal Division
1200 West Washington Street
Phoenix, AZ 85007

Jane Rodda *
Administrative Law Judge
Arizona Corporation Commission
400 West Congress
Tucson, AZ 85701-1347

and a true and correct copy was sent by U. S. Mail on May 16, 2002 to:

Thomas F. Dixon *
WorldCom, Inc.
707 – 17th Street, #3900
Denver, CO 80202

Terry Tan *
WorldCom, Inc.
201 Spear Street, 9th Floor
San Francisco, CA 94015

K. Megan Doberneck
Covad Communications Company
7901 Lowry Blvd.
Denver, CO 80230

Bradley Carroll
Cox Arizona Telcom, L.L.C.
20401 North 29th Avenue
Phoenix, AZ 85027-3148

Michael M. Grant
Gallagher and Kennedy
2575 East Camelback Road
Phoenix, AZ 85016-9225

Gena Doyscher
Global Crossing Local Services, Inc.
1221 Nicollet Mall, Suite 300
Minneapolis MN 55403

Traci Kirkpatrick
Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue
Portland, OR 97201

Michael W. Patten
Roshka Heyman & DeWulf, PLC
400 North Fifth Street, Suite 1000
Phoenix, AZ 85004-3906

Joyce Hundley
United States Dept. of Justice
Antitrust Division
1401 H Street NW, Suite 8000
Washington, DC 20530

Daniel Pozefsky
Residential Utility Consumer Office
2828 North Central Ave., #1200
Phoenix, AZ 85004

Mark N. Rogers
Excell Agent Services, L.L.C.
2175 W. 14th Street
Tempe, AZ 85281

Mark P. Trincherro
Davis Wright Tremaine
1300 SW Fifth Ave., Suite 2300
Portland OR 97201-5682

Penny Bewick
New Edge Networks
3000 Columbia House Blvd., Suite 106
Vancouver, WA 98661

Andrea P. Harris
Senior Manager, Regulatory
Allegiance Telecom, Inc.
2101 Webster, Suite 1580
Oakland, CA 94612

Karen L. Clauson
Eschelon Telecom, Inc.
730 2nd Avenue South, Suite 1200
Minneapolis, MN 55402

Joan S. Burke *
Osborn Maledon, P.A.
2929 N. Central Avenue, 21st Floor
Phoenix, AZ 85067-6379

Eric S. Heath *
Sprint Communications Company L.P.
100 Spear Street, Suite 930
San Francisco, CA 94105

Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Annapolis Junction, MD 20701

Jeffrey W. Crockett
Snell & Wilmer, LLP
One Arizona Center
Phoenix, AZ 85004-0001

Todd C. Wiley
Gallagher & Kennedy, P.A.
2575 East Camelback Road
Phoenix, AZ 85016-9225

Michael B. Hazzard
Kelley, Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036

Andrew Crain *
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202

Daniel Waggoner
Davis Wright Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688

Janet Livengood
Regional Vice President
Z-Tel Communications, Inc.
601 S. Harbour Island Blvd., Suite 220
Tampa, FL 33602

Timothy Berg *
Fennemore Craig, P.C.
3003 North Central Ave., #2600
Phoenix, AZ 85012

Charles W. Steese *
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202

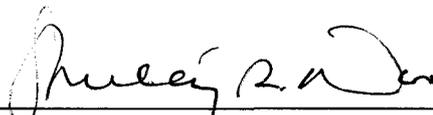
Raymond S. Heyman
Randall H. Warner
Roshka Heyman & DeWulf
Two Arizona Center
400 N. Fifth Street, Suite 1000
Phoenix, AZ 85004

Bill Haas
Richard Lipman
McLeodUSA Telecommunications
Services, Inc.
6400 C Street SW
Cedar Rapids, IA 54206-3177

Diane Bacon, Legislative Director
Communications Workers of America
Arizona State Council
District 7 AFL-CIO, CLC
5818 N. 7th Street, Suite 206
Phoenix, AZ 85014-5811

Brian Thomas
Vice President – Regulatory
Time Warner Telecom, Inc.
520 S.W. 6th Avenue, Suite 300
Portland, OR 97204

Executed on May 16, 2002 in San Francisco, California.



Shirley S. Woo