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MARC SPITZER
 Commissioner

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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 QWEST'S
 FILING OF LETTERS REGARDING
 PRE-ORDER TO ORDER
 INTEGRATION AND THE STAND-
 ALONE TEST ENVIRONMENT
 (SATE)**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T") hereby file their comments on the June 21, 2002 Qwest filing of letters regarding pre-order to order integration and the Qwest Stand-Alone Test Environment ("SATE"). AT&T recommends these letters be given no weight in the Arizona Corporation Commission's consideration of the operational readiness of Qwest Operations Support Systems ("OSS") in this docket.

As a threshold matter, Qwest's filing raises questions regarding the request by Staff's consultants to Qwest to obtain or submit letters favorable to Qwest from competitive local exchange carriers ("CLECs") "on the topics of preorder/order integration and SATE."¹ Staff has attempted to remain impartial during this proceeding. Now that Staff has recommended that Qwest's application be approved, Staff must be very careful that it does not appear to be trying to

¹ Qwest's Notice of Filing

remedy deficiencies in Qwest's case that have been raised by other CLECs after the record has been closed.²

AT&T believes this filing is an improper effort to buttress the weakness in the record on these two significant issues. AT&T has no factual information other than the Notice upon which to rely regarding the Consultant's request. There is no evidence on the nature of Qwest's request to these specific CLECs. Perhaps Qwest made its request only to CLECs that had agreed to provide support to Qwest's positions before the Commission.³ AT&T has no record of having received such a request from Qwest. The record in the proceeding is closed, and there is no opportunity to the CLECs to inquire into the contents of the letters, nor are representatives of the CLECs providing the letters available for cross-examination.

A. When The Letters Were Written Is Unknown

The letters submitted with the Qwest Notice are curious in that neither one is dated by their author. The date that each letter was faxed is evident, but there is nothing that indicates when the letters were actually written. The date is significant because of the considerable efforts expended by all parties to this case in the third-party test. If Qwest had these letters in its possession during the period that CGE&Y was evaluating the pre-order to order integration of Qwest's OSS and the period that HPC was evaluating the SATE and wished to rely upon them as evidence of compliance, they should have been provided by Qwest. AT&T would have been able to inquire about the contents of the letter in the workshops held by the Commission on these

² The Qwest filing raises a general issue – Qwest's repeated filings that attempt to bolster its compliance with the requirements of section 271, especially regarding the Change Management Process and the Stand-Alone Test Environment. The record is closed. If the filings are necessary to support a finding of compliance, the record should not have been closed and a finding of compliance should not have been made by Staff.

³ The motives of the two CLECs are not known but should be presumed suspect. According to a letter dated June 24, 2002, from J. Jeffrey Oxley, Eschelon Telecom, Inc., to Commissioner Marc Spitzer, Qwest proposed

issues. Regardless of when they were written, the late appearance of these letters reflects an act of desperation by Qwest to bolster an inadequate record on these issues.

B. The Allegiance Letter Fails To Help Qwest's Weak Showing On The Adequacy Of The SATE.

The Allegiance letter reports on progress that has been made to improve Qwest's CLEC testing environments. AT&T concurs that progress has been made, but this is not the standard. The Allegiance letter is mis-characterized as a testimonial to the SATE, in that it makes specific reference to the use of the "Qwest Testing environment on four different occasions in the past 15 months."⁴ The SATE was not released by Qwest until July 2001, which was 12 months ago.

Regardless of Allegiance's satisfaction with the SATE, the Commission has to hold Qwest to a higher standard than "customer satisfaction" as expressed in the letter. In the comments filed in this docket by AT&T and WorldCom regarding the extensive and wide-reaching deficiencies in the SATE,⁵ AT&T and WorldCom laid out the technical concerns and the appropriate FCC standards against which the SATE needs to be evaluated. Qwest's SATE does not yet satisfy these requirements, and the Allegiance letter does not address a single one of them.

C. The New Access Letter Does Not Move Qwest Closer To Achieving The Required Demonstration Of Integration Of Its Pre-order And Order Interfaces By Competitors.

conditioning payment to Eschelon on Eschelon testifying favorably on behalf of Qwest whenever requested by Qwest. There is no way of knowing whether similar conditions affect the CLECs' letters.

⁴ Allegiance letter

⁵ AT&T's Comments on OSS Test Report and Staff's Supplemental Reports on Checklist Item (OSS) dated May 16, 2002, at 5; AT&T's Comments On Qwest Corporations's Submission of Additional Evidence Regarding Pre-Order to Order Integration.

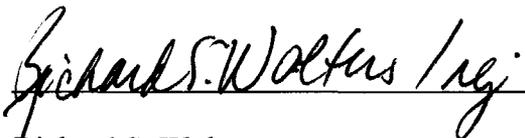
The New Access letter offers the Company's viewpoint that pre-order to order integration using Qwest's IMA EDI Release 9.0 has been achieved. What is not said in the letter is whether New Access actually developed the integration capability, which is the essential point that the FCC requires to be satisfied. The FCC's orders, which have been recited in AT&T's Comments on the CGE&Y Final Report, and the technical issues noted in AT&T's comments on the HPC Report on Pre-Order to Order Integration are at issue. The New Access letter does not address these critical points.

D. Summary And Conclusion

The letters from Allegiance and New Access should not be afforded any weight. They are uncorroborated and are an untested submission made by Qwest.

Dated this 1st day of July, 2002.

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OF THE MOUNTAIN STATES, INC.,
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CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T's Comments on Qwest's Filing of Letters Regarding Pre-Order to Order Integration and the Stand-Alone Test Environment (SATE)**, Docket No. T-00000A-97-0238, were sent by overnight delivery on July 1, 2002 to:

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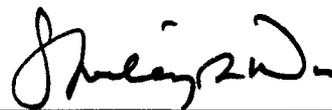
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