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ARIZONA CORPORATION COMMISSION

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MEMORANDUM

AZ CORP COMMISSION
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TO: Docket No. T-00000A-97-0238
Qwest's Section 271 Application

FROM: Maureen A. Scott
Attorney, Legal Division

DATE: July 2, 2002

SUBJECT: Data Requests to Cap Gemini Ernst & Young and Hewlett-Packard

Attached as Exhibit "A" is a copy of Staff's First Set of Data Requests sent to its Test Administrator, Cap Gemini Ernst & Young ("CGE&Y"), and to its Test Transaction Generator, Hewlett-Packard, in this Docket.

Arizona Corporation Commission
DOCKETED
JUL - 2 2002
DOCKETED BY [Signature]

cc: All Parties of Record

**ARIZONA CORPORATION COMMISSION STAFF'S
DATA REQUESTS TO CONSULTANTS
DOCKET NO. T-00000B-97-0238**

- STAFF 1-01: Please indicate, by each of the five tests performed, whether your test activities were: 1) not dependent upon CLEC input; 2) partially dependent upon CLEC input; or 3) heavily dependent upon CLEC input. Please give a detailed explanation of your response in each instance.
- STAFF 1-02: Of the evaluations falling into Categories 2 and 3, please provide the name and a brief description of the involvement of CLECs participating in each evaluation. This description should include the nature and extent that the CLEC was involved (e.g. CLEC provided facilities for CGE&Y or HP to use, CLEC actually input service request, etc.).
- STAFF 1-03: Of the evaluations falling into Categories 2 and 3, please indicate the efforts of CGE&Y and HP to obtain CLEC involvement where necessary to obtain a balanced and accurate evaluation.
- STAFF 1-04: Of the evaluations falling into Categories 2 and 3, please provide a description of any data or information provided by CLECs that was used in the findings and/or conclusions of the evaluation. Please separately identify each CLEC, the data or information provided by that CLEC, and how it was used or relied upon in any findings and/or conclusions.
- STAFF 1-05: Provide your expert opinion on whether any CLEC provided information or data relied on in the test findings improperly influenced the outcomes of the various tests performed. Please give a detailed explanation of your response in each instance.
- STAFF 1-06: Did the nonparticipation of any CLEC improperly influence the outcome of the various tests performed. Please give a detailed explanation of your response in each instance. If your answer is yes, please give a detailed explanation of how the outcome was improperly influenced by a CLEC's nonparticipation and what should be done to correct the outcome at this time.
- STAFF 1-07: In comparison to other 271 engagements that you are familiar with, did the Arizona test encourage CLEC participation at all stages to the same extent and allow CLECs the same degree of participation as other Section 271 engagements.
- STAFF 1-08: Having reviewed the responses of the CLECs to the recent Staff data requests in the Section 271 proceeding, were there any concerns raised by the CLECs which lead you to conclude that any test results were compromised or that the testing performed was inadequate. Please give a detailed explanation of your response in any testing area identified.

1 Original and ten copies of the foregoing
2 were filed this 2 day of July, 2002, with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, AZ 85007

7 Copies of the foregoing were mailed and/or
8 hand-delivered this 2 day of July,
9 2002, to:

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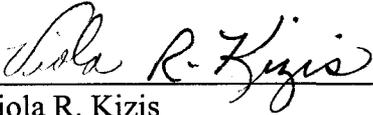
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