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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

DOCKETED

JUL 26 2002

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7 IN THE MATTER OF U S WEST
8 COMMUNICATIONS, INC.'S COMPLIANCE
9 WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

10 **QWEST'S RESPONSE TO AT&T'S COMMENTS ON QWEST'S FILING OF LETTERS**
11 **AND NOTICE OF FILING**

12 Qwest Corporation ("Qwest") hereby provides notice of filing the attached letter: Letter
13 from Venkates Swaminathan at NightFire to Jeff Thompson at Qwest. Qwest also submits this
14 response to AT&T's comments on Qwest's filing of letters from vendors regarding pre-order to
15 order integration and the Stand Alone Test Environment ("SATE").
16

17 Qwest received letters in support of the pre-order to order integration system and SATE
18 from CLECs using these products. Qwest submitted these letters to the Arizona Corporation
19 Commission ("ACC" or "Commission") as further evidence regarding these Qwest products. In
20 its comments, AT&T asks the Commission not to afford any weight to this evidence. However,
21 these letters constitute just the kind of evidence of actual commercial usage that the FCC relies
22 upon.¹ In addition, AT&T raises questions regarding the dates of the letters. Accordingly, Qwest
23 provides additional information regarding the letters below.
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25
26 ¹ *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc.,
And BellSouth Long Distance, Inc for Provision of In-Region, InterLATA Services In Georgia and*

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NEW ACCESS LETTER

Qwest received a letter from New Access on June 19, 2002 regarding Qwest's pre-order to order integration process. The letter was filed with the Arizona Commission on June 21, 2002. In the letter, New Access states that it can manage pre-order to order information via a database storage methodology to populate orders without data manipulation and integration. The letter also specifically describes the way in which New Access employs pre-order to order information and places it onto an order without manipulation. Thus, the New Access letter constitutes evidence of commercial usage showing that Qwest's pre-order to order integration process suits competitors' needs.

ALLEGIANCE LETTER

Qwest received a letter from Allegiance regarding SATE on June 18, 2002. The letter was filed with the Arizona Commission on June 21, 2002. In the letter, Allegiance states that the evolution of the SATE testing process has been a pleasure to work with, that SATE has reduced the amount of time spent testing new products with Qwest, and that assistance received has exceeded expectations, and results are always consistent. Further, Allegiance states that the SATE data request process is easy to use. Thus, this letter also constitutes evidence of commercial usage showing that Qwest's SATE meets competitors' needs.

Louisiana, CC Docket No. 02-35, Memorandum Opinion and Order, FCC 02-147 (rel. May 15, 2002), at ¶ 122.

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NIGHTFIRE LETTER

In total, Qwest has received five letters from four companies stating their satisfaction with Qwest's pre-order to order integration process and SATE.² All but one of these letters have been filed with the Arizona Commission as received. Qwest also received a letter from NightFire, sent June 28, 2002, which is attached to this response.

CONCLUSION

These letters constitute exactly the kind of evidence of commercial usage upon which the FCC relies in evaluating section 271 applications.³ These letters provide additional commercial evidence regarding Qwest's pre-order to order integration capabilities and SATE. Therefore, the Commission should afford these letters due weight as evidence of commercial usage.

² The TelCordia letter, dated January 28, 2002, from Richard Jacowleff was mentioned during the January 31, 2002 Arizona Workshop. Qwest has also received the following letters: letter from NightFire received on May 22, 2002 from Venkates Swaminathan; letter from Allegiance dated June 18, 2002 from Ian Coleman; letter from New Access dated June 19, 2002 from David Lueck; another letter from NightFire dated June 28, 2002 from Venkates Swaminathan.

³ See *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, CC Docket No. 99-295, Memorandum Opinion and Order, FCC 99-404 (rel. Dec. 22, 1999), at ¶ 121 ("Thus, we find that recent evidence from commercial usage suggests that Bell Atlantic's permanent QA environment works in the manner represented in its application."); *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 Texas*, CC Docket No. 00-65, Memorandum Opinion and Order, FCC 00-238 (rel. June 30, 2000), at ¶ 134, ("We conclude that SWBT's test environment affords competing carriers an adequate opportunity to test SWBT OSS changes prior to implementation... Thus, we find that the recent evidence from commercial usage suggests that SWBT's testing environment works in the manner represented in its application.").

1 RESPECTFULLY SUBMITTED this 26th day of July, 2002.

2 FENNEMORE CRAIG, P.C.

3
4 By: 

5 Timothy Berg
6 Theresa Dwyer
7 3003 North Central Ave., Suite 2600
8 Phoenix, Arizona 85012-2913
9 (602) 916-5421
10 (602) 916-5999 (facsimile)

11 *Attorneys for Qwest Corporation*

12
13 **ORIGINAL +10 copies filed this 26th day**
14 **of July, 2002, with:**

15 Docket Control
16 ARIZONA CORPORATION COMMISSION
17 1200 West Washington
18 Phoenix, AZ

19 **COPY of the foregoing delivered this 26th day**
20 **of July, 2002, to:**

21 Maureen A. Scott
22 Legal Division
23 ARIZONA CORPORATION COMMISSION
24 1200 W. Washington St.
25 Phoenix, AZ 85007

26 Ernest Johnson, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

1 Lyn Farmer, Chief Administrative Law Judge
2 Jane Rodda, Administrative Law Judge
3 Hearing Division
4 ARIZONA CORPORATION COMMISSION
5 1200 W. Washington
6 Phoenix, AZ 85007

7 Caroline Butler
8 Legal Division
9 ARIZONA CORPORATION COMMISSION
10 1200 W. Washington St.
11 Phoenix, AZ 85007

12 **COPY of the foregoing mailed this 26th day
13 of July, 2002, to:**

14 Eric S. Heath
15 SPRINT COMMUNICATIONS CO.
16 100 Spear Street, Suite 930
17 San Francisco, CA 94105

18 Thomas Campbell
19 LEWIS & ROCA
20 40 N. Central Avenue
21 Phoenix, AZ 85004

22 Joan S. Burke
23 OSBORN MALEDON, P.A.
24 2929 N. Central Ave., 21st Floor
25 PO Box 36379
26 Phoenix, AZ 85067-6379

Thomas F. Dixon
WORLD COM, INC.
707 N. 17th Street #3900
Denver, CO 80202

Scott S. Wakefield
RUCO
1110 West Washington, Suite 220
Phoenix, AZ 85007

1 Michael M. Grant
Todd C. Wiley
2 GALLAGHER & KENNEDY
2575 E. Camelback Road
3 Phoenix, AZ 85016-9225
4
5 Michael Patten
ROSHKA, HEYMAN & DEWULF
400 E. Van Buren, Ste. 900
6 Phoenix, AZ 85004-3906
7
8 Bradley S. Carroll
COX COMMUNICATIONS
20402 North 29th Avenue
9 Phoenix, AZ 85027-3148
10
11 Daniel Waggoner
DAVIS, WRIGHT & TREMAINE
2600 Century Square
12 1501 Fourth Avenue
Seattle, WA 98101
13
14 Traci Grundon
DAVIS, WRIGHT & TREMAINE
1300 S.W. Fifth Avenue
15 Portland, OR 97201
16
17 Richard S. Wolters
Maria Arias-Chapleau
AT&T Law Department
18 1875 Lawrence Street, #1575
19 Denver, CO 80202
20
21 Gregory Hoffman
AT&T
795 Folsom Street, Room 2159
22 San Francisco, CA 94107-1243
23
24 David Kaufman
E.SPIRE COMMUNICATIONS, INC.
343 W. Manhattan Street
25 Santa Fe, NM 87501
26

- 1 Diane Bacon, Legislative Director
COMMUNICATIONS WORKERS OF AMERICA
- 2 5818 N. 7th St., Ste. 206
- 3 Phoenix, AZ 85014-5811

- 4 Philip A. Doherty
545 S. Prospect Street, Ste. 22
- 5 Burlington, VT 05401

- 6 W. Hagood Bellinger
5312 Trowbridge Drive
- 7 Dunwoody, GA 30338

- 8 Joyce Hundley
9 U.S. DEPARTMENT OF JUSTICE
Antitrust Division
- 10 1401 H Street N.W. #8000
- 11 Washington, DC 20530

- 12 Andrew O. Isar
TELECOMMUNICATIONS RESELLERS ASSOC.
- 13 4312 92nd Avenue, NW
- 14 Gig Harbor, WA 98335

- 15 Raymond S. Heyman
ROSHKA, HEYMAN & DEWULF
- 16 400 N. Van Buren, Ste. 800
- 17 Phoenix, AZ 85004-3906

- 18 Thomas L. Mumaw
SNELL & WILMER
- 19 One Arizona Center
- 20 Phoenix, AZ 85004-0001

- 21 Charles Kallenbach
AMERICAN COMMUNICATIONS SVCS, INC.
- 22 131 National Business Parkway
- 23 Annapolis Junction, MD 20701

- 24 Mike Allentoff
GLOBAL CROSSING SERVICES, INC.
- 25 1080 Pittsford Victor Road
- 26 Pittsford, NY 14534

1 Andrea Harris, Senior Manager
2 ALLEGIANCE TELECOM INC OF ARIZONA
3 2101 Webster, Ste. 1580
4 Oakland, CA 94612

4 Gary L. Lane, Esq.
5 6902 East 1st Street, Suite 201
6 Scottsdale, AZ 85251

6 Kevin Chapman
7 SBC TELECOM, INC.
8 300 Convent Street, Room 13-Q-40
9 San Antonio, TX 78205

9 M. Andrew Andrade
10 TESS COMMUNICATIONS, INC.
11 5261 S. Quebec Street, Ste. 150
12 Greenwood Village, CO 80111

12 Richard Sampson
13 Z-TEL COMMUNICATIONS, INC.
14 601 S. Harbour Island, Ste. 220
15 Tampa, FL 33602

15 Megan Doberneck
16 COVAD COMMUNICATIONS COMPANY
17 7901 Lowry Boulevard
18 Denver, CO 80230

18 Richard P. Kolb
19 Vice President of Regulatory Affairs
20 ONE POINT COMMUNICATIONS
21 Two Conway Park
22 150 Field Drive, Ste. 300
23 Lake Forest, IL 60045

22 Janet Napolitano, Attorney General
23 OFFICE OF THE ATTORNEY GENERAL
24 1275 West Washington
25 Phoenix, AZ 85007

26

1 Steven J. Duffy
2 RIDGE & ISAACSON, P.C.
3 3101 North Central Ave., Ste. 1090
4 Phoenix, AZ 85012

4 Teresa Tan
5 WorldCom, Inc.
6 201 Spear Street, 9th Floor
7 San Francisco, CA 94105

7 Karen Clauson
8 ESCHELON TELECOM
9 730 Second Avenue South, Ste. 1200
10 Minneapolis, MN 55402

10 Curt Huttzell
11 State Government Affairs
12 Electric Lightwave, Inc.
13 4 Triad Center, Suite 200
14 Salt Lake City, UT 84180

13 
14 _____

15
16
17
18
19
20
21
22
23
24
25
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Jeff Thompson
Director, Wholesale IT
Qwest Communications
1005 17th Street
Denver, CO 80202

Date: June 27th, 2002

Re: IMA testing at Qwest

Mr. Thompson:

This letter confirms that NightFire Software has successfully tested in Qwest's Stand Alone Test Environment (SATE) and production systems on behalf of at least 5 Competitive Local Exchange Carriers (CLECs). NightFire has used SATE to test numerous pre-order and order transactions and have found that when a product is supported in SATE as well as in production, SATE mirrors the production environment. SATE has improved NightFire's ability to automate and manage EDI interfaces into Qwest. These interfaces connect Qwest to its CLEC trading partners and allow CLECs to have fully automated interfaces requiring little to no manual intervention.

Utilizing Qwest's SATE environment, NightFire has tested the last two major IMA releases (IMA 8.0 and 9.0) and will continue using it for future IMA releases to facilitate the testing of any new product, protocol, and business rule changes. NightFire has tested the following Qwest products in SATE:

- Resale POTS
- Unbundled Loop
- Number Portability
- Loop with Number Portability
- Directory Listings Only (Resale)
- Unbundled Distribution Loop (Sub-loop)
- Sub-loop with Number Portability
- Line Sharing
- UNE-P POTS

The SATE environment has allowed NightFire to test IMA releases and verify the functionality of the Qwest interface and NightFire's software prior to taking mutual customer's into production. NightFire has worked very closely with Qwest over the past year to define and improve the functionality of the SATE environment so that the needs of CLECs and vendors like NightFire are met. NightFire Software has provided a variety of CLEC customers and other Communication Service Providers with national LSR interfaces since 1998.

We hope this information is helpful. NightFire would be willing to discuss this information in more detail with the FCC, as needed.

Respectfully,

Venkates Swaminathan
Founder, Executive Vice President, and Chief Strategist