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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
COMMISSIONER
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

Arizona Corporation Commission
DOCKETED

AUG 30 2002

DOCKETED BY *CMR*

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

**QWEST CORPORATION'S RESPONSE TO
AT&T'S COMMENTS ON HEWLETT PACKARD'S
PREORDER TO ORDER INTEGRATION REPORT, VERSION 6**

Qwest Corporation ("Qwest") submits its response to AT&T's Comments on Hewlett Packard's Preorder to Order Integration Report, Version 6 ("AT&T's Comments").

Introduction

AT&T's Comments are based on a fundamental misunderstanding of the facts relating to Hewlett-Packard Consulting's ("HPC") issuance of version 6.0 of its Preorder to Order Integration Report ("Report"), issued July 31, 2002.

In the Version History log for the Report, HPC describes the change as follows:

Corrected typographical error on page 34, last paragraph, 3rd sentence to "team that was not experienced".

Thus, in redlined format, the change was as follows:

It is HPC's professional opinion, based upon its review of Qwest documentation, that a CSR to LSR parsing would be a very challenging and complex undertaking for a CLEC with an Information Technology team that was not experienced in EDI development.

AT&T mistakenly asserts that this change "is inconsistent with the balance of the Report and inconsistent with the testimony of HPC witnesses in the workshops." This contention is not supported by the facts or the record.

I. The Executive Summary has Consistently Contained the Statement, as Corrected.

HPC provided additional information regarding the change in an *ex parte* filing with the Federal Communications Commission ("FCC") relating to Qwest's section 271 application for Montana, Utah, Washington, and Wyoming. In that submission, HPC explains as follows:

HP has determined that an inadvertent typographical error occurred in the final paragraph of Section 5.3 CSR to LSR Parsing Analysis (page 37 of LN-OSS-11). **This paragraph was intended to be identical to the statement in the Executive Summary Section 1.3 CSR to LSR Parsing Analysis (page 9 of LN-OSS-11), however, the word "not" was omitted in error in the first sentence of the last paragraph on page 37 of LN-OSS-11.**¹

Thus, the following statement has appeared in the Executive Summary in prior versions of the Report, beginning as early as March 2002:

It is HPC's professional opinion, based upon its review of Qwest documentation, that a CSR to LSR parsing would be a very challenging and complex undertaking for a CLEC with an Information Technology team *that was not experienced* in EDI development.²

Contrary to AT&T's claim that this change is inconsistent with the balance of the Report, this change was made for the very purpose of making the statement consistent with the remainder of the Report. HPC simply corrected a typographical error that occurred later in the document to be consistent with what the Executive Summary has consistently said.

¹ Letter from Geoff May of Hewlett-Packard to Marlene H. Dortch of the FCC, dated August 18, 2002 (bold font and underlining added; italics in original). A copy of the letter is attached as Exhibit 1.

² See, e.g., HPC's Preorder to Order Integration Report, Version 4.0, dated March 28, 2002, at section 1.3.

II. The Record is Consistent with the Corrected Statement.

Contrary to AT&T's allegations, this correction does not change the meaning of HPC's conclusions or distort the record in this proceeding. HPC's conclusion in the Executive Summary has consistently stated that CSR to LSR parsing would be challenging for a CLEC with an Information Technology team "that was not experienced in EDI development." Further, AT&T points to a quote from the record that actually supports the statement *as corrected*:

MR. CONNOLLY: Your opinion is that a CLEC who's going to undertake an integration effort needs to be fairly sophisticated in EDI development or needs to acquire the services or product of a company that's done that work.

MR. NEVILLE: Correct.³

Contrary to AT&T's claim, this passage does not indicate that an experienced information technologies ("IT") team could not integrate preorder to order data. Rather, Mr. Neville of HPC confirmed that an IT team "fairly sophisticated in EDI development" *could* accomplish CSR to LSR parsing. This is entirely consistent with HPC's conclusion in the Report that such parsing would be challenging for an IT team without EDI development experience. Thus, the record in this proceeding and HPC's testimony on the issue are consistent.

III. No Action is Required.

AT&T suggests that the Commission should hold a workshop to discuss Version 6.0 of the Report or disregard that version of the Report. Neither is appropriate. No additional workshop should be held because prior versions of the Report that included the statement, as it has now been corrected, have been exhaustively discussed through the workshop process.

AT&T, along with other participants, questioned HPC witnesses regarding the Report. As set forth above, AT&T's own representative elicited testimony from HPC that is consistent with

³ April 17, 2002 Transcript at 43.

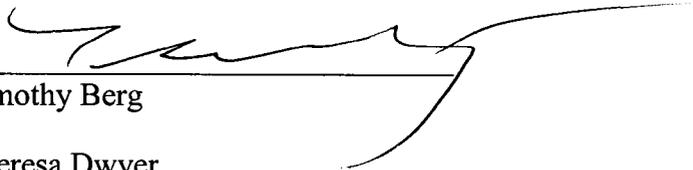
Version 6.0. Further, there is no reason to ignore the corrected version of the Report. Version 6.0 simply corrects a typographical error so that the second statement regarding CSR to LSR parsing is consistent with the first.

Conclusion

The Executive Summary of the Report has consistently stated that parsing would be challenging for an IT team without EDI development experience. HPC's correction of a typographical error in the Report does not change HPC's conclusion or its testimony in this proceeding. Accordingly, no action is required as a result of HPC's issuance of Version 6.0 of the Report.

RESPECTFULLY SUBMITTED this 30th day of August, 2002.

FENNEMORE CRAIG, P.C.

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A handwritten signature in cursive script, appearing to read "Clauson", is written over a horizontal line.

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FILED ELECTRONICALLY VIA ECFS

August 18, 2002

**Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554**

**Re: Ex Parte — Qwest Communications International, Inc.
Consolidated Application for Authority to Provide In-Region, Inter-
LATA Services in Montana, Utah, Washington, and Wyoming, WC
Docket No. 02-189**

Dear Ms. Dortch:

On July 31, 2002, the undersigned, representing Hewlett-Packard (“HP”), met by telephone conference with Jon Minkoff and Michael Carowitz of the FCC’s Wireline Competition Bureau upon the initiative of Mr. Carowitz. The discussion concerned HP’s Pre-Order to Order Integration Report, Version 5.0, dated April 15, 2002 for the Arizona Corporation Commission filed by Qwest in the above-captioned matter as LN-OSS-11. Specifically, Mr. Minkoff requested clarification regarding two paragraphs of this Report which appeared to be contradictory.

Upon review of these paragraphs, HP has determined that an inadvertent typographical error occurred in the final paragraph of Section 5.3 CSR to LSR Parsing Analysis (page 37 of LN-OSS-11). This paragraph was intended to be identical to the statement in the Executive Summary Section 1.3 CSR to LSR Parsing Analysis (page 9 of LN-OSS-11), however, the word “not” was omitted in error in the first sentence of the last paragraph on page 37 of LN-OSS-11.

HP has therefore today issued a corrected Version 6.0 of this report (attached).

Respectfully submitted,

**Geoff May
Hewlett-Packard**

Attachment