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Arizona Corporation Commission

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OCT 18 2002

AZ CORP COMMISSION
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IN THE MATTER OF
QWEST CORPORATION'S
STATEMENT OF GENERALLY
AVAILABLE TERMS AND CONDITIONS

Docket No. T-01051B-99-0068

IN THE MATTER OF
QWEST CORPORATION'S
COMPLIANCE WITH SECTION 271 OF
THE TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000A-97-0238

**QWEST CORPORATION'S REPLY TO AT&T'S COMMENTS ON
NOTICE OF UPDATED STATEMENT OF GENERALLY
AVAILABLE TERMS AND CONDITIONS**

Qwest Corporation ("Qwest"), submits this reply to AT&T's Comments on Qwest's recently filed Notice of Updated SGAT. AT&T's Comments pertain exclusively to Exhibit B, containing Performance Indicator Definitions ("PIDs"). Specifically, AT&T asserts and complains: that the PIDs reflected in Exhibit B are not really the result of consensus; that disputed PIDs are not documented and that Qwest did not specifically explain that the PIDs will be updated following Staff's decision; and that Exhibit B does not reflect the resolution of previous impasse issues. None of these complaints has merit.

First, in asserting that the PIDs contained in Exhibit B do not reflect consensus, AT&T is simply wrong. In fact, the Exhibit B filed with the SGAT was the exact same PID

document that was approved by the Arizona TAG at its June 13, 2002 meeting. This fact is substantiated by the PID meeting minutes from that June 13th meeting.¹ Specifically, the minutes demonstrate that the Arizona TAG approved the PID changes that had been previously approved by the Regional Oversight Committee (“ROC”), and merged several ROC PIDs into Arizona.² Moreover, in response to an action item arising from the June 13th TAG Meeting, Qwest distributed a PID document, along with a notice indicating that “[a]s agreed in the June 13, 2002 AZ TAG meeting, Qwest has created a 14 state PID document incorporating state specific standard differences where applicable.”³ The PID document included as Exhibit B in Qwest’s SGAT filing in Arizona is the same PID document that was distributed with this email. If AT&T disputes the approval of this version of PIDs, it should not have waited over three months to voice an objection.

AT&T also suggests that the PIDs contained in the 14 state version of the PID are in dispute, citing as an example PO-19.⁴ While it is true there is a version of PO-19 that is still pending final approval,⁵ the PO-19 included in the 14 state Working PID is the version of PO-19 previously approved by the Arizona TAG in the November 11, 2002 TAG Meeting. This agreement is reflected in the impasse decision on the benchmark issued by the Commission on April 3, 2002. There, the Commission noted that “[a]lthough the TAG has

¹ See Meeting Minutes of June 13, 2002 Meeting of the Arizona TAG as Reviewed and Approved at the July 25, 2002 TAG Meeting (attached as Exhibit 1).

² *Id.*, Items 3 & 4.

³ See E-mail to Arizona TAG Members Distributed by Deb Prescott on behalf of Kathy Haile on June 26, 2002 (attached as Exhibit 2).

⁴ AT&T Comments at 2.

⁵ In the 10-11-02 TAG meeting Hagood Bellinger stated the SATE Change Request is no longer at Impasse and that the Staff will have something out to the parties soon. Qwest is awaiting the staff document so that it can incorporate the agreed upon changes into the pending PO-19 proposal for TAG approval.

reached collaborative agreement on the PID description, it has been unable to reach agreement on the standard to be used for the PID,” and that the “parties agree[d] that a benchmark is the proper type of standard but disagree[d] on the benchmark level.”⁶

AT&T fails to recognize that the entire 271 workshop and SGAT process is an iterative one. Here, it was appropriate for Qwest to include the version of PO-19 that had been previously approved by the TAG on November 11, 2001, and reflects the parties’ agreement that a benchmark standard should be used. Nowhere did Qwest represent that the Exhibit B as filed was a “final” document. To the contrary, Section 20.0 of the SGAT specifically recognizes that Exhibit B contains PIDs that have been developed by the TAG, but that “[s]ubsequent changes to these PIDs shall be incorporated.”⁷ When negotiations on the new PO-19 are concluded and the new version becomes officially approved by the TAG, Qwest will amend Exhibit B accordingly.

AT&T also argues that the PID does not reflect resolution of previous impasse issues regarding measurements and cites the impasse resolution on PO-1B as an example, asserting that “Exhibit B is deficient because it fails to describe the system of measuring and reporting that Qwest is to implement by end of year 2002.”⁸ AT&T is wrong. The PID is entirely consistent with Staff’s resolution of this impasse issue. Indeed, Staff found that “for purposes of PID calculation in the interim, Qwest shall continue to use IRTM until a decision is made at the 18 month and/or 24 month review whether to use EDI response times as measured at the Qwest IA or continue to use IRTM.”⁹ Moreover, Staff explicitly recognized that “Arizona may in the interim decide to join the ROC long-term PID oversight

⁶ Impasse Issue on Benchmark for PO-19 Stand-Alone Test Environment (“SATE”) Accuracy at 1.

⁷ SGAT § 20.0.

⁸ AT&T’s Comments at 3.

⁹ Impasse Issue on Use of IRTM for PID PO-1B (Master Issue #940) at 12.

committee . . . [and that] in the end it may be up to the ROC group, including Arizona, whether to change the PO-1 and related PID measurements to utilize actual EDI response times as measured at the Qwest IA.”¹⁰ Accordingly, the PID language for PO-1B included in Exhibit B correctly reflects the impasse resolution on the use of IRTM for measurement. Although Qwest is implementing the Staff’s requirement to develop the ability to measure response times at the Qwest IA by year-end 2002, there was no a requirement to change the PO-1B definition.

Finally, AT&T complains that Exhibit B contains multiple references to changes that were under development and expected to be implemented in the June of 2002 report,” and that “Qwest provided a version of the PID that was dated September 23, 2002.”¹¹

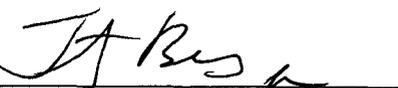
As noted above, Exhibit B is the same PID that was approved by the TAG on June 13th, and distributed by Qwest in an e-mail on June 26th. As such, the availability information it contains is the availability as of the publication date of the PID. Since June results are not published until mid-July, availability information for items effective in June results were appropriately reflected. The September 23, 2002 date in the footer of Exhibit B is the footer that was generically applied to all pages of the SGAT filing, and does not constitute a revision date for the PID. Had Qwest made updates to the availability sections of the June 26th document, it would have been guilty of exactly what AT&T accused it of—submitting a PID document that had not been previously reviewed and approved by the Arizona TAG. More information about implementation of specific items found in the availability sections of the PID can be found in the Summary of Notes on the Qwest Regional Performance Results Report published with each month’s results.

¹⁰ Id at 12 n. 2.

¹¹ AT&T Comments at 3.

For the foregoing reasons, Qwest respectfully requests that the Commission allow the updated filing of Exhibits B to go into effect.

RESPECTFULLY SUBMITTED this 18th day of October, 2002.

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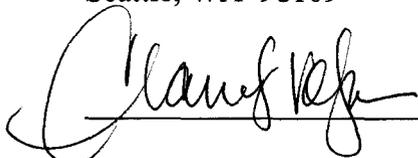
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1351294.1/67817.150

EXHIBIT

1



SEDONA 271 TEST ADVISORY GROUP MEETING MINUTES

Thursday, June 13, 2002

8:30 AM

Qwest Comments: Below are modifications consistent with Qwest's understanding of what was discussed and agreed upon in the TAG on June 13, 2002.

Section I: Opening Business

1. Introduction

The meeting of the Arizona Commission Sedona Test Advisory Group (TAG) was held on Thursday, June 13, 2002 with attendees attending via conference call.

2. Roll Call

Roll call was taken at the beginning of the TAG Meeting to ensure the test participant groups (CLECs, Pseudo-CLEC, Test Administrator, Qwest, DCI and ACC) had a representative present. The following test participants attended:

Company	Name
CGE&Y	Debra Prescott
CGE&Y	Ellen Pritts**
CGE&Y	Jerry Stroud
CGE&Y	Susan Hayslip**
DCI	Hagood Bellinger**
DCI	Phil Doherty**
HP	Sumil Saigal
HP	Curt Carland
WCOM	Chad Warner
WCOM	Becky Oliver
Qwest	Lynn Stang
Qwest	Dean Buhler*
Qwest	Janet Nimrod
Qwest	Mike Williams
Qwest	Kathy Haile
Qwest	Merrill Bennett
Qwest	Monica Luckritz
Qwest	Wendy Green
Qwest	Sandy Maffei
Qwest	Trina Jones
Qwest	Scott Alexander
Qwest	Judy Madden
Qwest	Lorretta Huff
Qwest	Jeff Thompson
AT&T	Tim Connolly*
AT&T	Rick Wolters

*TAG Core Members, **AZ 271 Management Team members (ACC, CGE&Y, DCI)

1. Meeting Packet/Project Calendar Review

Debra Prescott went over the contents of the meeting packet. The meeting minutes for May 21, 2002 were included in the packet. The meeting minutes were accepted as issued with the comments from Qwest.

Section II: Discussions



1. Long Term PID Admin

Staff attended the last meeting concerning ~~long Long term Term PID administration~~ Administration (LTP) ., there was ~~no~~A proposal was submitted from Qwest to the LTPA email distribution list. However, at this time ~~and~~ Staff was not certain that it had received a copy. ~~can not move forward with a decision until the proposal has been submitted.~~ Qwest reported that the ROC Steering Committee was to give the Executive committee its recommendation, after which the next step would be for the ROC commissioners to publish how they would like to proceed. (Worldcom confirmed that this also was its understanding as to the status of LTPA.) AT&T stated they will not continue to support PID administration on an individual state basis. Qwest stated there has not been anything sent out from the ROC since the last meeting, but Qwest will forward to the AZ TAG a copy of the ~~current~~ Long Term PID Administration Proposal it provided to the LTPA distribution list. This will continue to be an item on the TAG Discussion list for the future.

(Action Item* Qwest to distribute to the AZ TAG the current Long Term PID Administration Proposal.

2. PO-19 Operations Document

Wendy Green explained the second exclusion to be applied to considered for the PID which was followed by discussion ~~between among the parties~~ concerning acceptance of the exclusion. It was explained the reason the exclusion had been discussed in CMP, referred to the SATE Users Group meetings where a proposal was put together and presented back ; referred to CMP and brought back to the SATE Users Group for approval. That reason is the separate prioritization of SATE and IMA that could result in something being implemented in IMA but not prioritized high enough to be implemented in SATE. AT&T and WCOM stated they would need to discuss with their people involved in the discussion of the PID-prioritization process in the SATE Users Group and the CMP meetings before accepting the exclusion to the PID.

(Action Item*) Qwest to distribute a copy of the meeting minutes from the SATE User's Group meeting documenting the discussion of the exclusion for the PO-19 PID.

Further discussion surrounding PO-19 included:

Definition of major release – Qwest stated this definition is in the CMP redesign document effective 5/2/02, AT&T stated they will confirm this in the June filing,

VICKI – concerning FOC for flow through and that PO-19B only measures flow through not VICKI, flow through occurs automatically. Qwest further stated that if a FOC is received in SATE or production it is flow through and if there is no FOC received the order falls to manual handling.

Qwest I Chart – The I chart will in 10.0 but Qwest will be using a worksheet going forward.

Listing of Legacy Systems involved in outage exclusion – Qwest is not agreeable to update PID continuously. AT&T requested a reference list be added to the web site of the systems. Qwest agreed to clarify the reference to "underlying systems" language in the PID. ~~add a list of systems that impact the IMA interface.~~

Update product/activity combinations in PID description – Qwest will add note that product/activity mix for PO-19 B will be evaluated after each major release and updated as necessary. Qwest will distribute a list to CLECs with information provided for release, product/activity is updated when multiple CLECs are utilizing and include all activity in 95% of production. AT&T requested that a CLEC be able to add a product or activity to the product/activity mix be subject to CLEC requests for additions be added to for PO-19 B even if only one CLEC is utilizing. but Qwest disagreed, Qwest claims this is unprecedented in the PID process.

(Action Item*) Qwest to distribute an updated PO-19 by COB 6/14/02.

(Action Item*) CLECs to review updated PO-19 and reply by COB 6/19/02.



3. Review of ROC Approved PID Changes

PO-9 Qwest to added language to specify "C" orders included are limited to inward order activity. Approved by AZ TAG.

PO-16 AZ TAG approved – definition incorporating CMP

OP-3,4,5,6 & MR-3,4,6,7,8,10 AZ TAG agreed to UNE-P Centrex 21 disaggregation.

OP-4 AZ TAG approved the change to a 15 day benchmark for loops with conditioning

OP-6 AZ TAG agreed to exclude orders delayed solely for customer caused misses.

4. 14 State PID

Qwest stated that parties are very close to a single plan with a few differences in definitions and the state specific differences standards and reporting levels. Qwest proposed published a 14 state PID with standard differences will be incorporated. PO-5 B & C have differences in the definitions for Arizona and the results for PO-5E have been very close good. Qwest suggested these that AZ adopt the ROC version of PO-5 reflect the ROC definition and all parties agreed. Qwest will add reporting of PO-15 and OP-15 from the ROC to Arizona reports. and Once a new definition for PO-19 is finalized, it will be different for Arizona until the Long Term PID administration group can consider it for the other states.

(Action Item*) Qwest to publish new PID for 14 states with state specific exceptions by June 28, 2002.

5. Review of New Manual Service Order Accuracy PID, PO-20

Qwest will begin manual data collection in June with approximately 400-500 orders per product category with the results published in the July report. The PID will be diagnostic and will be looked at under the Long Term PID Administration. The PID was generated by-in response to a KPMG report and at the direction of the ROC Steering Committee, but has not been discussed in the ROC yet. AT&T and WCOM suggested the ROC should address the PID first. The Steering Committee is reviewing at this time. Qwest will be submitting the draft as diagnostic, the CLECs will have a comment period.

(Action Item*) CLECs to have comments back on draft of PO-20 by COB June 27, 2002.

6. MIL Review

There were six action items from the May 21 TAG Meeting remaining open and all six were closed before the beginning of this meeting. There were five new action items that will be added to the MIL.

1. Next TAG Meeting

Please see the dates below for scheduled TAG Meeting dates and times:

Thursday, June 27, 2002 at 8:30 AM (AZ time)

The meeting will be a conference call.

EXHIBIT

2

To: Robert.Dryzgula@cgey.com, Robert.Dryzgula@cgey.com, elizabeth.lehr@cgey.com, elizabeth.lehr@cgey.com, susan.hayslip@cgey.com, david.mcelroy@cgey.com, david.mcelroy@cgey.com, Prescott@tmn.usa.capgemini.com, debra.prescott@cgey.com, jerry.stroud@cgey.com, jerry.stroud@cgey.com, MAS@cc.state.az.us, mjarnol@qwest.com, MJR@cc.state.az.us, MJR@cc.state.az.us, mkalleberg@cc.state.us.az, mkalleberg@cc.state.us.az, rboyles@cc.state.us.az, rboyles@cc.state.us.az, ckempley@cc.state.us.az, ckempley@cc.state.us.az, dsmith@cc.state.us.az, dsmith@cc.state.us.az, gregm@ggga.net, gregm@ggga.net, hagoodb@bellsouth.net, hagoodb@bellsouth.net, rhip@bellatlantic.net, rhip@bellatlantic.net, rita.hammers@cgey.com, rita.hammers@cgey.com, chad.warner@wcom.com, chad.warner@wcom.com, dbuhler@qwest.com, dbuhler@qwest.com, gerald_schumm@hp.com, jerry.stroud@cgey.com, jxmadde@qwest.com, jxmadde@qwest.com, khaile@qwest.com, khaile@qwest.com, larry.tierney@cox.com, larry.tierney@cox.com, liz.balvin@wcom.com, liz.balvin@wcom.com, rwolters@att.com, rwolters@att.com, connolly@csusa.net, Timothy@tmn.usa.capgemini.com, Thomas.F.Dixon@wcom.com, Thomas.F.Dixon@wcom.com, tom.priday@wcom.com, tom.priday@wcom.com, WoodE@PerkinsCoie.com, WoodE@PerkinsCoie.com, becky.oliver@wcom.com, becky.oliver@wcom.com, bill_koerner@hp.com, bill_koerner@hp.com, curt_carland@hp.com, curt_carland@hp.com, cxorte2@qwest.com, cxorte2@qwest.com, cvivero@qwest.com, cvivero@qwest.com, eyockus@fcc.gov, eyockus@fcc.gov, diane_hoschler@hp.com, diane_hoschler@hp.com, jnimrod@qwest.com, jnimrod@qwest.com, james_oconnell@hp.com, james_oconnell@hp.com, finneganjf@att.com, finneganjf@att.com, joyce.hundley@usdoj.gov, joyce.hundley@usdoj.gov, Mark.Cook@ey-as.com, dcooke@qwest.com, knewlan@qwest.com, knewlan@qwest.com, lchase@Covad.com, lchase@Covad.com, lnotari@qwest.com, lnotari@qwest.com, mjarnol@qwest.com, MAS@cc.state.az.us, mdoberne@Covad.com, mdoberne@Covad.com, mgwill1@qwest.com, mgwill1@qwest.com, mluckri@qwest.com, mluckri@qwest.com, smaffei@qwest.com, smaffei@qwest.com, scasey@qwest.com, scasey@qwest.com, thjones@qwest.com, thjones@qwest.com, baboyd@qwest.com, dkbac@aol.com, hhaney@qwest.com, ellen.pritts@cgey.com, ellen.pritts@cgey.com

cc:

Subject: 14 State PID Document CP-1249

Please see the message below and the enclosed file.

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Subject: 14 State PID Document

Debra,
Please forward the attached message to the AZ TAG.
Thanks,
Kathy Haile

TO AZ TAG MEMBERS;
As agreed in the June 13, 2002 AZ TAG meeting, Qwest has created a 14 state PID document incorporating state specific standard differences where applicable. This reflects the agreement in the TAG to merge the AZ and ROC PIDs, adopting PO-5, PO-15 and OP-15 from the ROC PID in AZ. The definitions are the same as the previously approved versions from the ROC 5.0 PID. State specific standards for Arizona and Colorado, where unique, have been shown separately under affected PIDs to facilitate the creation of this unified PID document for the 14 states of Qwest's local service region.
This completes Action Item AI.06.13-05.
Thanks,
Kathy Haile

(See attached file: 14 State 271 Wkg PID ver 5.0-26Jun02.doc)

(See attached file: 14 State 271 Wkg PID ver 5.0-26Jun02.doc)



- 14 State 271 Wkg PID ver 5.0-26Jun02.doc