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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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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/ESCHELON OP-5 DATA
) RECONCILIATION REPORT

AT&T Communications of the Mountain States, Inc. and TCG Phoenix,
(collectively, "AT&T") hereby file their comments on Cap Gemini Telecom Media &
Networks U. S., Inc.'s ("CGE&Y") Qwest/Eschelon OP-5 Data Reconciliation Report,
Draft Version 2.0, dated October 24, 2002.

I. INTRODUCTION

The CGE&Y reconciliation of Qwest and Eschelon OP-5 New Service Installation Quality performance data identified numerous and significant errors and omissions in how Qwest calculates the OP-5 performance measurement results. These errors and omissions on the whole tend to favor Qwest and result in Qwest's OP-5 performance in installing services for competitive local exchange carriers ("CLECs") being better than it really is. AT&T recommends that Qwest be required to remedy the numerous deficiencies in its OP-5 results and report results that are actually compliant with the OP-5 PID so that the Arizona Corporation Commission ("ACC") can get a

realistic and accurate view of the quality of Qwest's installation of new services for CLECs.

II. COMMENTS

A. **Qwest Has Perverted the Purpose of the OP-5 PID.**

The purpose of the OP-5 PID has always been to measure the quality of Qwest's installation activities for a period of thirty days after the installation from the perspective of the customer. For a customer changing its service from Qwest to a CLEC the first thirty days after an installation are critical. Customers that experience a trouble with their service shortly after having it moved to a CLEC will certainly be dissatisfied and may react to that dissatisfaction by moving their service back to Qwest or cautioning their friends, neighbors and/or co-workers about the peril involved in switching their service from Qwest.

During the development of the OP-5 PID the CLECs paid particular attention to ensuring that any trouble that was experienced by a customer would be captured in the OP-5 PID. To ensure there was no confusion about the customer-centric perspective the OP-5 and other maintenance and repair PIDs should take, the PID defines Customer Trouble Reports as “[a] report that the carrier providing the underlying service opens *when notified that a customer has a problem with their service.*” AZ 271 Working PID Version 7.0, November 16, 2001, p. 88 (emphasis added). Simply stated, if a CLEC's customer experiences a problem with its service, contacts the CLEC to notify it of that problem and the CLEC notifies Qwest, that is a customer trouble report. CGE&Y agrees and stated, “CGE&Y feels that any trouble or service defect which results in a call from an end user customer reflecting that customer's overall experience is indicative of the

‘quality of installation’ provided by the incumbent. It should be reflected in the overall installation quality measure.” CGE&Y Response to AT&T’s Question 13.

Qwest has perverted the purpose of the OP-5 PID by spinning the perspective completely away from the customer and towards Qwest’s myriad operational departments. Under Qwest’s warped interpretation, the fact that a customer may have a problem with his or her service has very little to do with whether it considers a report of that problem a trouble report. In Qwest’s world, what determines whether a notice that a customer has a problem with its service is or is not a trouble report is which internal Qwest department caused the problem and which internal Qwest department solved the problem.

If a customer reports a problem with its service and Qwest deems the problem to be caused by Qwest’s order typing group, then Qwest does not consider the report of a problem a trouble report. If a new CLEC customer reports a problem of having lost its dial tone for several hours on the day of installation and Qwest decides that the loss of dial tone was the result of its failure to work all of the necessary internal service orders, not only will Qwest not consider the out-of-service condition a trouble report, Qwest will not even consider the customer having no service for several hours a problem at all.

CGE&Y’s data reconciliation is only now shedding light on Qwest’s Byzantine and PID non-compliant methods for counting trouble reports and, more importantly, how Qwest is not counting trouble reports. After collaborating with Qwest, other CLECs, Doherty and Company, Inc. (“DCI”), CGE&Y and the ACC for more than three years on performance measurement definitions, AT&T is greatly disturbed to find that agreements and decisions were made after having received something less than the “whole truth”

from Qwest on Qwest-provided information used to reach agreements and make decisions. While AT&T will direct the remainder of its comments to the OP-5 data reconciliation, the ACC should not forget how the CGE&Y findings in the OP-5 data reconciliation fit into the bigger picture. Qwest's failure to be forthright on how it defines and excludes from OP-5 trouble reports is yet another example of the pattern of Qwest misconduct in this proceeding and other matters (*e.g.* secret deals, buying CLECs out of the section 271 process, accounting irregularities, and withholding of information from the FCC.)

B. There Should Be No Confusion About What the OP-5 PID Should Cover.

1. It Was Agreed By All Parties That the OP-5 PID Counts as Trouble Reports Customer Problems With Requested Features and Services Not Installed and Unordered Features and Service Installed.

Very early in the discussions of the Arizona PIDs there was a request by the CLECs to have a service order accuracy performance measurement for Arizona. The CLECs were concerned, among other things, that Qwest could fail to install all of the features and services that the customer requested or that Qwest could install and bill CLECs for features and services that the customer did not order. At the time, Qwest argued against having a service order accuracy measurement because Qwest believed it would be duplicative with the OP-5 New Service Installation Quality performance measurement. Qwest argued that if Qwest failed to install all of the required features or if it installed features that were not ordered, the CLEC would contact Qwest, have a trouble report opened and the problem would be captured in the OP-5 PID.

At the time, Qwest proposed that the period of "new service" be only seven days. With the understanding that missing or incorrect service and feature installation would be

captured in the new service installation quality PID, the CLECs proposed that the period of “new installation” be extended to thirty days. In that way, if a Qwest installed a feature or service that the customer did not order, the thirty day period would give the customer sufficient time to receive a bill, recognize that fact and report the problem to the CLEC.

In the spirit of compromise, it was agreed that a service order accuracy measurement would not be necessary in Arizona. That agreement was based upon assertions by Qwest that missing or incorrect feature and service problems would be captured in the OP-5 measurement. Only recently did the parties find out that Qwest’s assertion that missing and incorrect service and feature problems would be captured in the OP-5 measurement was not accurate.

Qwest has recently admitted that if a CLEC customer experiences a problem with missing or incorrect features and services and the CLEC reports the problem to Qwest, the problem may or may not be counted as a trouble report. Until very recently, Qwest never told the ACC, the CLECs, DCI or CGE&Y about the situations in which customer problems with missing or incorrect features and services would not be counted in the OP-5 measurement. Qwest kept silent for nearly three years and led the ACC, the CLECs, DCI and CGE&Y to believe that all problems with missing or incorrect features would be captured in the OP-5 measurement. Only now are we finding out that is not the case.

Qwest has recently admitted that: 1) if the Qwest ordering process successfully translated a CLEC’s LSR into Qwest internal service orders, 2) the orders were completed in Qwest’s service order processor, 3) the Qwest internal department responsible for provisioning the features and services did not install all of the requested

services and features on the internal service orders or installed the wrong services and features, and 4) the CLEC contacts Qwest to notify them of the customer's problem, only then will Qwest create a trouble report that would be captured in the OP-5 measurement. Qwest also recently admitted that: 1) if the Qwest ordering process introduces service and feature errors into the internal Qwest service orders while translating a CLEC's LSR into Qwest internal service orders, 2) the Qwest internal department responsible for provisioning the features and services installs all of the services and features listed on the Qwest internal service order, and 3) the CLEC contacts Qwest to notify them of the customer's problem, Qwest will not create a trouble report that would be captured in the OP-5 measurement. Qwest calls this situation an LSR/Service Order mismatch and claims that customers' problems with the service should not be counted as a trouble report or a miss against the OP-5 measurement.

In both of the above situations the customer has the exact same experience – requested features and services are not installed or services and features are installed that were never ordered. From the customer's perspective, the customer is experiencing a problem with that service. From a customer's perspective, the Qwest internal department that caused the problem is irrelevant. However, what Qwest only recently has disclosed is that the customer's perspective is irrelevant and what really counts in determining if a problem reported by a customer is or is not a trouble report is whether the problem was created in Qwest's ordering process or its provisioning process. If Qwest believes that the problem's genesis was in Qwest's ordering department, Qwest does not define the problem as worthy of a trouble report. If Qwest believes the problem was created in Qwest's provisioning department, only then will Qwest count the problem as a trouble

report. Qwest codes trouble reports that it deems to have been created by Qwest departments other than Qwest's provisioning group as "referred to another department."

There is absolutely no justification in the OP-5 PID or any publicly available Qwest documentation for Qwest to exclude customer reports of problems with their service because the problems were created by Qwest's ordering group. CGE&Y agrees and indicated that it found "no justification in the PID for excluding [troubles referred to another department] from the OP-5 calculation." CGE&Y Response to AT&T's Question 26. Nor did Qwest disclose to CGE&Y during the Performance Measurement Audit ("PMA") that it was not counting customer reports of problems with their service that were created by Qwest's ordering department as trouble reports for OP-5. CGE&Y Response to AT&T's Questions 1 and 2.

To ensure that Qwest's inappropriate exclusion of troubles reported by customers that were caused by Qwest's ordering department remained known only to Qwest, Qwest inappropriately excluded those trouble reports from the raw MTAS data that CGE&Y examined as part of the PMA. The Test Standards Document states that "[t]he TA will request the three most current consecutive months of retail and CLEC historical raw data (before exclusions) and Qwest computed Performance Measures." Test Standards Document, Section 7.3.3. To maintain its deception, Qwest *excluded* trouble reports with a disposition code indicating that the trouble was caused by a Qwest department other than the Qwest provisioning department from the purportedly "historical raw data (before exclusions)". Since Qwest inappropriately excluded trouble reports from what should have been raw data, it is not surprising that CGE&Y only realized in the OP-5 data reconciliation the extent of Qwest's deception.

Qwest should have been and should now be counting all reports of problems from customers where the problem was caused by a department other than the Qwest provisioning department as trouble reports for the OP-5 measurement.

2. It Was Agreed By All Parties That, With Very Limited Exceptions, the OP-5 PID Would Count As Troubles for the OP-5 Measurement Outages Experienced by Customers on the Day of Conversion.

One of the most significant CLEC concerns in the development of the OP-5 performance measurement was that situations in which the customer totally lost service on the day of installation would be captured in the OP-5 PID. One of the biggest sources of frustration for both the CLEC and the CLEC's customer is when the customer loses service on the day the customer moves its service from Qwest to the CLEC. The CLECs were adamant that these day-of-installation outages be captured in the OP-5 measurement.

Qwest's initial position was that outages experienced by CLEC customers on the day of installation would not be captured in the new service installation quality measurement. The CLECs and some regulators were adamant that day-of-installation outages should be captured in any new service installation quality measurement. During a September 15 -16, 1999, OSS workshop with Minnesota Commissioner Greg Scott, the CLECs explained the absurdity of Qwest's position of excluding day-of-installation outages. Qwest's representative, Ms. Lynn Notarianni, attempted to justify Qwest's position. After hearing the CLECs and Qwest discuss the issue, Commissioner Scott agreed with the CLECs that Qwest's position of excluding day-of-installation outages from a new service installation quality measurement was inappropriate.

In response to the CLEC's and regulator's concerns, Qwest agreed to a separate reporting of outages experienced on the day of installation. The Arizona OP-5 PID was

revised to include the new OP-5B disaggregation. The new OP-5B “[m]easures the monthly average percentage of trouble reports reported by the CLEC on or after the day the order is installed and prior to the completion of the order in Qwest’s service order processor.” Arizona PID, version 5.0, June 12, 2000. The new OP-5B PID addressed the CLECs’ concern of including outages on the day of installation in the OP-5B.

Eventually, Qwest suggested to the TAG that separate OP-5A and OP-5B PIDs were no longer necessary because Qwest had been capturing outages on the day of installation in the OP-5A PID. Qwest made that proposal in response to AZIWO2017 at the January 10 and 11, 2001, TAG meeting. The minutes of that TAG meeting state:

OP-5A & B Qwest proposes to combine OP-5A&B and make the measure just OP-5. All the data will be captured in the one measure. The problem that could occur is a slight time delay in orders being completed in WFAC and therefore a trouble ticket could not be generated if a trouble condition existed. This is not a PID problem, but a Qwest process problem. Sedona 271 Test Advisory Group Meeting Minutes, Wednesday and Thursday, January 10 & 11, 2001, p. 8.

Based upon Qwest’s assertion that outages on the day of installation that had been captured in the OP-5B PID would be captured in an OP-5 PID, the TAG agreed to combine the OP-5A and OP-5B PIDs. Now it is discovered that the conclusion that “[a]ll the data will be captured in the one measure” is not true. The “whole truth” is that for definitional reasons, Qwest does not count all outages on the day of installation as troubles for OP-5 and, even if it wanted to count those as troubles, its systems make it *impossible* for any CLEC trouble reports on the day of installation to be counted as a CLEC trouble for the purpose of the OP-5 measurement.

One of the more frequent causes of a CLEC customer losing its service on the day it was scheduled to be migrated from Qwest to the CLEC is that Qwest works an internal

order to disconnect a customer's service but fails to work the internal order to provide the new service to the customer. When this happens, the customer can lose service for several hours. From a customer's perspective, a complete loss of service is most certainly a problem. However, from Qwest's perspective, a complete loss of service for hours or even days is not a problem at all. When Qwest is notified by the CLEC of the customer's out-of-service condition and it finds that it failed to work the order to connect the customer's service, Qwest completes the unworked service order and the customer finally has service. Qwest does not view the fact that it failed to work the new connect order and that it only did work on the new connect order after it was notified by the CLEC as a problem. In fact, Qwest will count the installation as a completely successful installation and an installation that was free of a trouble report for the OP-5 measurement. Qwest ignores the fact that the customer could have been out of service for several hours by implying that it had not completed the new connect order, and it cannot be held accountable while the order is still being processed.

Qwest's interpretation that a customer being out of service for several hours is not a problem and is, for the purpose of OP-5, a trouble-free installation is outrageous and contrary to the assertions it made that formed the basis of the agreement to combine OP-5A and OP-5B. Once again, Qwest failed to tell the "whole truth" when it failed to highlight to the ACC, the CLECs, DCI and CGE&Y that a disconnection of a CLEC customer's service and a failure to work the required new connect order would not be captured as an installation with a trouble.

Even if Qwest did not utilize a non-compliant PID interpretation, that an out of service condition is not a customer trouble, Qwest's systems do not permit Qwest to

record *any* CLEC trouble reports on the day of installation. The Qwest LMOS limitations identified by CGE&Y do not permit a trouble report opened by a CLEC to be counted in OP-5 as a CLEC trouble report until the day after installation or even many days after installation. To add insult to injury, Qwest counts many CLEC troubles on the day of installation or shortly after as *retail* trouble reports. Qwest's LMOS limitations results in Qwest overstating the CLEC results for OP-5 and overstating the retail trouble rate results for MR-8. The overstatement of CLEC results for OP-5 and retail results for MR-8 benefits Qwest.

3. Qwest Should be Required to Include All Reports of Customer Problems with Services and Features and All Outages on the Day of Installation in the OP-5 PID.

AT&T believes that the OP-5 PID was written to include all instances of reports by customers of problems with services and features as misses in the OP-5 PID, and Qwest's failure to include all those instances is a violation of the PID language. AT&T also believes that the OP-5 PID was written to include all instance of outages on the day of installation as a miss in the OP-5 PID, and Qwest's failure to count them as such is a violation of the PID language.

Contrary to suggestions by CGE&Y, the PID does not need to be revised to include what Qwest should have been including as misses all along. Instead, Qwest should be required to report as misses what it should have been reporting all along. Outages on the day of installation and all customer reports of problems with features and services should be included as misses for OP-5. The ACC should not validate or in any way endorse Qwest's misconduct and failure to tell the "whole truth" about how it counts and does not count trouble reports by supporting CGE&Y's implication that the OP-5 PID requires modification. The fact that Qwest deceived the ACC, the CLECs, DCI and

CGE&Y for so long about what it was not counting as misses for OP-5 does not make it now acceptable. Agreements were made as to what would be considered misses for OP-5 based upon assertions made by Qwest. Qwest should be held to those agreements and not be permitted to use the duration of its PID non-compliance as a reason for maintaining its PID non-compliance.

C. CGE&Y's Findings Call Into Question the Accuracy of Qwest Reported Performance Results Other Than For the OP-5 PID.

1. The CGE&Y Findings Indicate That Qwest's Order Accuracy Results Are Inaccurate and Likely Underreport Instance of LSR/Service Order Mismatches.

Out of 562 Eschelon orders completed during the months of May and June of the year 2002, CGE&Y found nine instances of mismatches between the Eschelon LSR and the service orders that Qwest created from the LSR. OP-5 Data Reconciliation Report, p. 32. This represents an error rate of 1.6%. Notwithstanding the fact that Qwest should be counting these reports of problems by the customer in the OP-5 results, Qwest's Service Order Accuracy measurement¹ appears to significantly under report the rate of LSR/Service order mismatch errors. In the three months that Qwest reported service order accuracy data, Qwest's rate of errors never exceeded 0.79% and has been as low as 0.43%.² In contrast, the error rate that CGE&Y found was from two to almost four times higher than what Qwest reported. The significant differences between what an independent auditor and Qwest calculated for order accuracy results demonstrate why it is a folly to rely upon any of Qwest's unilaterally developed and unaudited performance

¹ In an ill-conceived attempt to plug the numerous holes in its OP-5 and PO-20 measurements, Qwest is now reporting results for a Service Order Accuracy – Via Call Center Data measurement. This measurement is not a PID. It was recently and unilaterally developed by Qwest. Qwest asserts that it counts the number of feature and/or service problems as a result of Qwest errors in translating the CLECs' ordered features and services with the services and features that end up on the Qwest service order(s).

² Qwest Order Accuracy Performance Results, October 18, 2002 Report.

measurements. Instead of placing any reliance on Qwest's service order accuracy performance measurement, the ACC should require that instances of what Qwest describes as an LSR/Service Order Mismatch be reported as misses in the OP-5 performance measurement. Once Qwest begins to report OP-5 results that include LSR/Service Order Mismatches, those results be audited by an independent third party prior to the ACC placing any reliance on them.

2. The CGE&Y Findings Indicate That Qwest's MR-8 Trouble Rate Results Are Inaccurate and Likely Understate the Rate of CLEC Troubles and Overstate the Rate of Qwest Retail Troubles.

Because of inherent problems with Qwest's databases, there are situations where Qwest systematically codes CLEC trouble reports as retail trouble reports. OP-5 Data Reconciliation Report, pp. 27 – 30. In a very small sample of troubles examined, CGE&Y found twenty-two trouble reports that should have been classified as Eschelon trouble reports. Apart from resulting in inaccurate OP-5 results for CLECs, Qwest's error also results in inaccurate MR-8 results. A new service installation trouble would be counted in both the OP-5 and MR-8 results. CGE&Y Response to AT&T Question 18. Counting CLEC troubles as retail troubles will deflate the CLEC MR-8 Trouble Rate Results and Inflate the same Qwest Retail results. This could result in a conclusion of parity on MR-8 results when, in fact, disparate treatment is being provided. Qwest should be required to remedy its problems that result in the incorrect assignment of the CLEC ID and recalculate the MR-8 Trouble Rate Results.

It is also likely that Qwest's systematic misassignment to trouble reports of retail IDs instead of CLEC IDs will result in inaccurate and incorrect results for most, if not all, of the other maintenance and repair measurements. MTAS is the database that Qwest

uses for all of the maintenance and repair PID results. If Qwest has assigned a trouble report to a retail ID instead of a CLEC ID, that mistake will carry through to all of the MR-type measurements. Qwest should be required to recalculate all of the MR results that are affected by Qwest's misassignment problem.

3. CGE&Y's Findings Indicate That Qwest's Self-Reported Results for the Accuracy of the Disposition and Cause Codes Assigned to Trouble Reports Are Wholly Inaccurate.

CGE&Y found that Qwest was making many mistakes in the assignment of disposition and cause codes to trouble reports. Among other pieces of information, the disposition and cause codes indicate whether Qwest or the CLEC caused the trouble. If the CLEC caused the trouble, the trouble is excluded from the OP-5 results. In response to a CGE&Y finding that Qwest was making many errors in the assignment of disposition and cause codes, Qwest touted an internal audit process that it regularly performed and stated, "Qwest's June results indicate a 97.99% accuracy rate for non-designed tickets." OP-5 Reconciliation Report, p. 27.

CGE&Y found that Qwest's accuracy rate was much lower than Qwest's reported result of 97.99%. CGE&Y found that Qwest assigned the wrong disposition and cause code in 25% of the trouble reports that CGE&Y examined. In the 25% of the cases where Qwest assigned the wrong disposition and cause code, in 82% of the cases Qwest blamed the CLEC for the trouble when the cause really was Qwest; and in 18% of the cases Qwest blamed itself when the cause really was Eschelon. CGE&Y Response to AT&T Question 58. The net effect is that Qwest was inappropriately excluding 4.5 CLEC trouble reports from the OP-5 results for every one trouble report that Qwest inappropriately included, and Qwest's reported OP-5 results for CLECs were overstated.

CGE&Y indicated that it made no attempt to verify the accuracy of Qwest's reported accuracy rate of 97.99% or to review the process that Qwest employs to audit the disposition and cause code accuracy. CGE&Y Response to AT&T Question 58. Instead, CGE&Y requested that Qwest provide documentation to support the disposition and cause codes for the specified Eschelon trouble reports. The results speak for themselves and are shouting that Qwest's process for assigning disposition and cause codes is very unreliable and the process that Qwest employs for auditing the accuracy of disposition and cause code is wholly ineffective.

D. Repeat Reports Should Be Included in the OP-5 Results.

There was a great deal of discussion in the Arizona TAG about whether or not repeat reports should be included as misses in the OP-5 results. Both the CLECs and Qwest argued and agreed that repeat reports should be counted as misses in the OP-5 measurement. It was recognized that there was no exclusion for repeat reports in the PID and that Qwest should be including repeat reports as OP-5 misses.

While AT&T suspects that Qwest agreed that repeat reports would be included in the OP-5 measurement to ensure that the OP-5-related IWOs 2017 and 2043 were closed as quickly as possible and to avoid having to take the time and effort to change its programming to exclude repeat reports, AT&T's motivation was much different. AT&T believes the OP-5 PID is intended to measure the customer's experience for a period of thirty days after a service has been installed. It focuses on the customer's initial experience with their new service provider.

CGE&Y proposed that repeat reports be excluded from the OP-5 results because, “[r]epair reports do not represent subsequent installation errors, but instead reflect

Qwest's failure to clear the trouble the first time. Repeat repair reports are indicative of the quality of Qwest's maintenance and repair services, and are already reflected in the MR-7 measure, "Repair Repeat Report Rate." OP-5 Reconciliation Report, p. 37. In making that proposal, CGE&Y fell into the trap of viewing the customer's report of a problem with the service from the perspective of the internal Qwest departments -- not from the perspective of the customer. From the perspective of the customer, two problems within the first thirty days of service is going to suggest to the customer that his or her new service provider is not very good. The customer is not going to care that the first problem was caused by the provisioning group and the second problem was caused by the repair group. From the customer's perspective, it will appear that the new service and the new service provider are pretty bad.

There certainly is a MR-7 Repeat Report Rate measurement that was intended to track how well Qwest does in repairing troubles right the first time. However, the existence of that measurement does not obviate the need to count all reports of customer problems that occur within thirty days of service installation. The fact that a customer may have had more than one problem in the thirty day period after installation is no reason to exclude from the OP-5 results all of the troubles except for the first. The PID should continue to require that repeat trouble reports be included in the OP-5 measurement.

E. CGE&Y's Findings Indicate That Qwest is Incapable of Reporting OP-5 Results For What Qwest Believes it Should Be Reporting.

In addition to the numerous instances of Qwest inappropriately excluding entire classes of troubles from the OP-5 results, CGE&Y found that Qwest makes numerous errors with what Qwest agrees it should be reporting. CGE&Y found that the

programming that excludes repeat troubles from the OP-5 results is non-compliant with the PID. CGE&Y Response to AT&T Question 40. Qwest's failure to include repeat reports as misses increased the reported OP-5 results for Eschelon by 1.8%. CGE&Y found that Qwest's programming that fails to properly identify inward order activity because of a prior non-inward order was non-compliant with the PID. CGE&Y Responses to AT&T Questions 43 & 52. Qwest's failure to recognize inward orders resulted in Qwest's reported OP-5 results for Eschelon being increased by 1.6%. CGE&Y found that Qwest's inability to record as a miss in OP-5 any CLEC trouble reports opened on the day of installation is non-compliant with the PID. CGE&Y Response to AT&T Question 84. Qwest's failure to recognize CLEC trouble reports on or soon after the day of installation because it coded the trouble report as a retail trouble caused the OP-5 results for Eschelon to be higher by 2.5%. CGE&Y found Qwest's programming that excluded legitimate new service installation trouble reports as repeat reports because there had been a previous trouble report that Qwest deemed was CLEC-caused is non-compliant with the PID. OP-5 Reconciliation Report, pp. 18 – 20. This resulted in Qwest overstating the OP-5 results for Eschelon by 1.6%.

III. CONCLUSION

CGE&Y found numerous and significant problems with Qwest inappropriately excluding entire classes of troubles from the OP-5 results. CGE&Y also found numerous and significant errors in what Qwest was including or excluding in the OP-5 results. Because of these numerous and significant problems with the accuracy and reliability of Qwest's OP-5 results, the ACC should place no weight on Qwest's current OP-5 results. Instead, the ACC should require Qwest to stop excluding those classes of troubles that

should be included in the OP-5 results, require Qwest to fix the numerous problems with how Qwest determines order and trouble report OP-5 eligibility, produce a new set of PID-compliant OP-5 results and have the results audited by an independent third party.

Just as a rose by any other name would smell as sweet, so too does a trouble report by any other name cause problems for CLEC customers. Qwest should not be permitted to exclude entire classes of trouble reports from the OP-5 results because it unilaterally, and without the knowledge of the ACC, the CLECs, DCI and CGE&Y, decided to call trouble reports “escalation tickets” or “call center tickets” or trouble-free installations. Qwest is sure to argue that excluding entire classes of troubles from the OP-5 PID is nothing more than a misunderstanding that should be cleared up sometime in the future as part of the six-month review process. That argument should be rejected. The problem is not the OP-5 PID or that every party but Qwest misunderstood the PID. The problem is that Qwest has been reporting results that are non-compliant with the PID. Rather than wait for a fix to occur months into the future, the ACC should require Qwest to immediately begin to implement the necessary fixes. Only then will the ACC have the information needed to determine if Qwest is installing services for CLECs at a level of quality that is at parity with how Qwest installs services for its retail customers.

Respectfully submitted this 11th day of November, 2002.

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AND TCG PHOENIX**

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CERTIFICATE OF SERVICE

I certify that the original and 10 copies of AT&T's Comments on Qwest/Exchelon OP-5 Data Reconciliation Report in Docket No. T-00000A-97-0238 were sent by overnight delivery on November 11, 2002 to:

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