

1 **A. INTRODUCTION**

2 At the July 30-31, 2002 Arizona Corporation Commission (“ACC”)
3 workshop, Eschelon Telecom, Inc (Eschelon) raised concerns related to Qwest’s
4 compliance with Section 271. Eschelon provided independently calculated data
5 that showed significantly lower results than the results reported by Qwest. Based
6 on this information, the Commission Staff and its consultants, Doherty &
7 Company, Inc. (“DCI”) requested that CGE&Y collect trouble ticket information
8 from Eschelon for orders completed in May 2002, and reconcile that data with the
9 information contained in Qwest’s ad hoc data. The purpose of this effort was to
10 determine if Qwest’s published OP-5 result is accurately reflecting the
11 performance observed by Eschelon. These comments address the report that
12 provides the results of CGE&Y’s findings related to the Qwest/Eschelon Arizona
13 OP-5 data reconciliation efforts.
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17 **B. SPECIFIC COMMENTS**

18 **1. Executive Summary**

19 The purpose of the OP-5 PID is to evaluate the quality of Qwest’s ordering
20 and installation of service activities for a period of 30 days after installation. This
21 is a critical time for customers who are switching from Qwest to a CLEC.
22 Customers who experience problems right from the start are likely to quickly
23 become dissatisfied and may be unwilling to remain with the CLEC. These
24 customers will also likely share with others the problems they have experienced
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1 which could sway others from giving a CLEC the opportunity to serve these
2 customers. The report is clear that CGE&Y identified several issues during the
3 comparison of the Eschelon provided data and the Qwest provided ad hoc data that
4 lead CGE&Y to conclude that Qwest's reporting of the quality of installation
5 provided to Eschelon does not reflect the true service quality per the PID 7.0. The
6 report states:

8 • CGE&Y identified several issues during the comparison of the
9 Eschelon provided data and the Qwest provided ad hoc data that indicated Qwest
10 is not calculating OP-5 in strict accordance with the PID 7.0.

12 • The OP-5 calculation as defined in the PID is not completely
13 representative of all troubles CLECs experience in relation to a new installation.

15 • CGE&Y found that Qwest is failing to include certain eligible repeat
16 reports, troubles reported before LMOS has been updated with the new service
17 order information, and troubles on lines within 30 days of an inward installation
18 but after a subsequent invalid order type in OP-5.

20 • In addition, the data reconciliation uncovered inherent differences
21 between the information captured by a CLEC and the performance data captured
22 by Qwest that prevents the CLEC from recalculating the OP-5 PID from its own
23 data. Specifically, trouble situations experienced by a CLEC relating to a new
24 installation are not captured as trouble tickets readily available for inclusion into
25 Qwest's OP-5 calculation.
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1 • CGE&Y identified cases where troubles appeared to be coded to the
2 responsibility of the wrong party. CGE&Y also found troubles classified as the
3 incorrect carrier as a result of the trouble being reported before LMOS was
4 updated.
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6 Due to the numerous issues uncovered as part of their data reconciliation
7 efforts, CGE&Y has made a number of recommendations meant to remedy the
8 significant deficiencies discovered :
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10 • “CGE&Y recommends that Qwest implement a process to correct
11 the tickets coded in error prior to the release of their regulatory reports.” CGE&Y
12 has found that errors on trouble tickets such as the incorrect disposition codes
13 cannot be corrected after the ticket is closed. WorldCom believes that Qwest
14 should implement safeguards to prevent the tickets from being coded in error in
15 the first place.
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17 • “Disaggregation of the current OP-5 measure to include the
18 following installation related errors: OP-5A the current PID version of OP-5 –
19 (absent repeat reports); OP-5B - service disruptions – day of installation; OP-5C -
20 service order accuracy; and OP-5D - overall installation quality. CGE&Y
21 recommends that OP-5D measure the total percentage of new installations without
22 a trouble or customer affecting condition experienced within the first 30 days of
23 installation (an aggregation of OP5-A, B, C, and D).” It is unclear if the OP-5 PID
24 is actually inadequate or if many of these issues are caused by Qwest’s self-
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1 serving interpretation of what is a trouble report (*i.e.* troubles corrected through a
2 service order, mismatches between LSR and the service order, and certain troubles
3 on the day of installation not seen as trouble reports). WorldCom would support
4 looking at ways to assure the performance measures pick up all installation errors
5 including service disruptions – day of installation, service accuracy, and overall
6 installation quality. Once implemented these measures need to be audited for
7 accuracy.
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10 • “The inclusion of repeat repair reports in OP-5 does not represent
11 subsequent installation errors, but instead reflects Qwest’s failure to clear the
12 trouble the first time. Repeat repair reports are indicative of the quality of Qwest’s
13 maintenance and repair services, and are already reflected in the MR-7 measure,
14 “Repair Repeat Report Rate”. CGE&Y recommends that repeat reports should be
15 excluded from OP-5.” WorldCom disagrees with CGE&Y’s statement and their
16 recommendation to exclude repeat reports from OP-5. CGE&Y states “[A]s
17 reflected in section 2.1.2, according to the PID 7.0, repeat repair reports are not
18 excluded from OP-5.” There can be two separate and distinct installation errors
19 within 30 days where the second report does not represent a failure to clear the
20 trouble the first time. In addition, Qwest can make multiple installation errors
21 where the second error would be detected until the first error had been corrected.
22 Moreover, there is the potential for instances when another trouble ticket must be
23 sent within 30 days to fix a newly installed circuit that Qwest claims was fixed or
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1 on which FOK/TOK or other code indicating working conditions was returned.

2 Finally, in Section 5, pg. 34 of this report CGE&Y states “When AZIWO2041 was
3 discussed at a TAG meeting, it was decided that repeat repair reports would
4 continue to be included in the PID, and the IWO was therefore closed.” CGE&Y
5 also agreed in its response to #41 of AT&T’s question log that CGE&Y provided
6 on 11/6/02 that, “during the January 10-11, 2001 and January 22, 2001 TAG
7 meetings that the TAG, including Qwest, agreed that repeat reports should be
8 included in the OP-5 results.” CGE&Y also agreed in its response to #42 of
9 AT&T’s question log, “that Qwest has never proposed a change to the OP-5 PID
10 that would add repeat reports as an exclusion.” The PID should continue to
11 require repeat trouble reports be included in the OP-5 measurement.
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- 15 • “According to Qwest, it is implementing a fix to correct various
16 LMOS restrictions that are preventing the correct assigning of the installation
17 indicator. CGE&Y recommends that this fix be implemented immediately and
18 audited for accuracy.” WorldCom agrees this fix should be implemented
19 immediately and audited for accuracy. Qwest should lay out how it specifically
20 plans to correct and an expedited time frame to do so.
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- 22 • “CGE&Y recommends that Qwest identify and track error
23 conditions as the result of LMOS limitations and incorporate them to the OP-5
24 measure prior to the release of the regulatory reports.”
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- 26 • “Qwest should not consider tickets as excluded from MTAS when

1 assigning the installation indicator to later tickets on the same line. In addition, in
2 cases where these troubles are excluded because they were referred to another
3 department, CGE&Y recommends that such cases be considered by the TAG for
4 inclusion in service installation quality calculations.” WorldCom agrees.
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6 Nowhere in the OP-5 PID does it permit the exclusion of trouble reports because
7 “they were referred to another department.” Qwest should not be allowed to code
8 to another department even though it is a legitimate problem to move it off the
9 measurement books. In response to AT&T’s question #22 on the 11/6/02
10 clarification conference call about troubles “referred to another department,”

11 CGE&Y responded in writing that “CGE&Y finds no justification in the PID for
12 excluding these troubles from the OP-5 calculation” and stated verbally that this
13 “makes this exclusion non-compliant with the PID.” In addition, at no time did
14 Qwest disclose to CGE&Y during the Performance Measurement Audit that
15 “Qwest was not counting new service installation troubles resolved through the
16 submission of a service order” and also that “Qwest was not counting a mismatch
17 of an LSR and a service order as a trouble report for the purpose of the OP-5 PID.”
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20 Customers are only really concerned that they are experiencing troubles and want
21 them fixed; they do not care which Qwest department caused the problem. When
22 the problem is caused by another department other than Qwest’s provisioning
23 department, the problem should be, nonetheless, a trouble report under the OP-5
24 measurement.
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2 While it is good that the reconciliation uncovered these numerous issues, it
3 is troubling to WorldCom that these issues were not captured and corrected as part
4 of the Qwest Performance Measurement Audit and the OSS third-party test. Now
5 that these issues have been identified, it is critical that they be addressed and
6 corrected prior to Arizona recommending Section 271 approval. Qwest must
7 completely address and remedy the numerous deficiencies related to the OP-5
8 measures and service accuracy that CGE&Y has now uncovered. The ACC, FCC,
9 and CLEC's are entitled to an accurate, realistic, and complete picture of Qwest's
10 new service installation quality.
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13 **II. Overall Report Findings**

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15 It has now become clear that during the Qwest Performance Measurement
16 Audit that CGE&Y was not aware that Qwest is not counting new service
17 installation troubles resolved through the submission of a service order as a trouble
18 report for the purpose of OP-5 and mismatches of an LSR and a service order as a
19 trouble report for the purpose of the OP-5 PID. In addition, Qwest's process for
20 receiving, from CLECs, reports of troubles within 72 business hours of installation
21 might not result in a trouble report being created.
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23 Another issue is certain troubles experienced on the day of the conversion.
24 The report states "Based on the information provided by Eschelon and available in
25 MTAS, CGE&Y identified 11 installations in May and June 2002 where
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1 Eschelon's end-user experienced a disruption of service for an extended period of
2 time on the day of installation. (See Eschelon Cases 5, 6, 7, 8, 11, 12, 13, 43, 46,
3 47, and 48). In most of these cases, the new service was to be provisioned with a
4 disconnect ("D") order disconnecting the old service, and a new ("N") order
5 establishing the new service. For UNE-P orders, the end-user is expected to
6 experience little if any service disruption. The service disruption that resulted in
7 these 11 cases was due to the N and D orders separating and the D order being
8 worked hours in advance of the N order. Because the end-user is not expected to
9 experience a service outage for more than a few minutes, CGE&Y finds that these
10 service disruptions represent installation errors that should impact the OP-5 quality
11 of installation measure." Even though a customer may be out of service for an
12 extended amount of time, Qwest is not counting this as a problem. Qwest simply
13 completes the work and ignores the fact that the customer was completely out of
14 service and feels it cannot be held accountable because the order is still being
15 processed. CGE&Y found that customer's lost dial tone on 1.6 percent of UNE-P
16 orders "for an extended period of time on the day of installation." This is a
17 stunning finding. Loss of dial tone is obviously a severe problem. The expectation
18 is that the end-user is expected to experience little if any service disruption and
19 Qwest should be counting these cases where the D order is being worked on hours
20 in advance of the N order.

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26 CGE&Y also found 9 instances of mismatches or installations which were

1 not provisioned as an order on Eschelon's LSR . Because Eschelon's orders were
2 frequently not being provisioned as ordered, it began comparing LSRs to PSONs
3 to identify errors on the PSON and notify Qwest prior to installation so it could fix
4 the problem. According to CGE&Y, "each error Eschelon discovers on the PSON
5 and notifies Qwest prior to the installation due date, reduces the numerator of
6 Qwest's 'OP-5 Supplemental Data' measure by one." Therefore, Qwest is
7 reporting more favorable, but inaccurate results than the actual results. As
8 CGE&Y states, Qwest should be responsible for insuring that it is typing service
9 orders accurately and that these are customer affecting issues that should be
10 counted in the PID. Qwest's service order accuracy (OP-5/PO-20) needs to be
11 evaluated further and any additional PID developments need to be audited.
12 CGE&Y also found that Qwest is making many errors in assigning disposition and
13 cause codes on trouble reports. CGE&Y identified 8 troubles inappropriately
14 excluded because Qwest coded these troubles as CLEC-Caused in error. These
15 exclusions mean that Qwest understates their OP-5 results and these types of
16 errors need to be addressed.

21 **C. CONCLUSION**

22 The stated purpose of CGE&Y's data reconciliation effort was to determine
23 if Qwest's published OP-5 result is accurately reflecting the performance observed
24 by Eschelon. The report is clear that CGE&Y identified several issues during the
25 comparison of the Eschelon provided data and the Qwest provided ad hoc data that
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1 lead CGE&Y to conclude that Qwest's reporting of the quality of installation
2 provided to Eschelon does not reflect the true service quality per the PID 7.0. In
3 addition, CGE&Y found that the OP-5 calculation as defined in the PID is not
4 completely representative of all troubles CLECs' experience in relation to a new
5 installation. The PID defines Customer Trouble Reports as "[a] report that the
6 carrier providing the underlying service opens when notified that a customer has a
7 problem with their service." Therefore, now that these issues have been
8 identified, it is critical that the ACC should place no weight on Qwest's reported
9 OP-5 results. Qwest must completely address and remedy the numerous
10 deficiencies related to the OP-5 measures and service accuracy that CGE&Y has
11 now uncovered. The ACC, FCC, and CLECs are entitled to an accurate, realistic
12 and complete picture of Qwest's new service. A new set of OP-5 PID compliant
13 results must be produced and audited by an independent third party prior to
14 Arizona recommending Section 271 approval.

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18 RESPECTFULLY submitted this 12th day of November, 2002.

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20 LEWIS AND ROCA LLP

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22 Thomas H. Campbell
23 40 N. Central Avenue
24 Phoenix, Arizona 85004
25 Telephone (602) 262-5723

26 - AND -

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21
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24
25
26

Thomas F. Dixon
WorldCom, Inc.
707 – 17th Street, #3900
Denver, Colorado 80202
Telephone: (303) 390-6206

Attorneys for WorldCom, Inc.

ORIGINAL and ten (10)
copies of the foregoing filed
this 12th day of November, 2002, with:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand-delivered
this 12th day of November, 2002, to:

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Jane Rodda, Administrative Law Judge
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Ernest Johnson, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing mailed
this 12th day of November, 2002, to:

Lyndon J. Godfrey
Vice President – Government Affairs
AT&T Communications of the
Mountain States
111 West Monroe, Suite 1201
Phoenix, Arizona 85003

1 Scott Wakefield
Residential Utility Consumer Office
2 1110 W. Washington Street, Ste. 220
Phoenix, Arizona 85007

3 Mark Dioguardi
4 Tiffany and Bosco PA
500 Dial Tower
5 1850 N. Central Avenue
Phoenix, Arizona 85004

6 Richard M. Rindler
7 Swidler & Berlin
3000 K. Street, N.W.
8 Suite 300
Washington, DC 20007

9 Maureen Arnold
10 US West Communications, Inc.
3033 N. Third Street
11 Room 1010
Phoenix, Arizona 85012

12 Jeffrey W. Crockett
13 Snell & Wilmer
One Arizona Center
14 Phoenix, Arizona 85004-0001

15 Richard P. Kolb
Vice President – Regulatory Affairs
16 OnePoint Communications
Two Conway Park
17 150 Field Drive, Suite 300
Lake Forest, Illinois 60045

18 Andrew O. Isar
19 TRI
4312 92nd Avenue N.W.
20 Gig Harbor, Washington 98335

21 Eric S. Heath
Sprint Communications Company L.P.
22 100 Spear Street, Suite 930
San Francisco, CA 94105

23 Steven J. Duffy
24 Ridge & Isaacson P.C.
3101 N. Central Avenue
25 Suite 1090
Phoenix, Arizona 85012-1638

26

LEWIS
AND
ROCA
LLP
LAWYERS

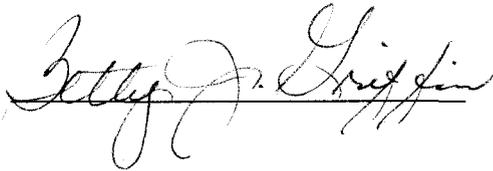
- 1 Timothy Berg
Fennemore, Craig, P.C.
2 3003 N. Central Avenue
Suite 2600
3 Phoenix, Arizona 85012-3913
- 4 Andrew Crain
Qwest Corporation
5 1801 California Street, Ste. 5100
Denver, Colorado 80202
- 6 Joan S. Burke
7 Osborn & Maledon
2929 N. Central Avenue
8 21st Floor
Phoenix, Arizona 85067-6379
- 9 Richard S. Wolters
10 AT&T & TCG
1875 Lawrence Street
11 Suite 1575
Denver, Colorado 80202
- 12 Michael M. Grant
13 Todd C. Wiley
Gallagher & Kennedy
14 2575 E. Camelback Road
Phoenix, AZ 85016-4240
- 15 Raymond S. Heyman
16 Michael Patten
Roshka Heyman & DeWulf
17 Two Arizona Center
400 Fifth Street, Ste. 1000
18 Phoenix, Arizona 85004
- 19 Diane Bacon, Legislative Director
Communications Workers of America
20 5818 North 7th Street, Ste. 206
Phoenix, Arizona 85014-5811
- 21 Joyce Hundley
22 United States Department of Justice Antitrust Division
1401 H Street, N.W., Ste. 8000
23 Washington, D.C. 20530
- 24 Daniel Waggoner
Davis Wright Tremaine
25 2600 Century Square
15011 Fourth Avenue
26 Seattle, Washington 98101-1688

- 1 Alaine Miller
1633 Westlake Avenue N, #200
2 Seattle, Washington 98109-6214
- 3 Mark N. Rogers
Excell Agent Services, LLC
4 2175 W. 14th Street
Tempe, Arizona 85281
- 5 Traci Grundon
6 Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue
7 Portland, Oregon 97201
- 8 Mark P. Trincherro
Davis Wright Tremaine LLP
9 1300 S.W. Fifth Avenue, Suite 2300
Portland, Oregon 97201
- 10 Gena Doyscher
11 Global Crossing Local Services, Inc.
1221 Nicollet Mall
12 Minneapolis, Minnesota 55403-2420
- 13 Penny Bewick
New Edge Networks, Inc.
14 P.O. Box 5159
Vancouver, WA 98668
- 15 Jon Loehman
16 Managing Director – Regulatory
5800 Northwest Parkway
17 Suite 135, Room I.S. 40
San Antonio, TX 78249
- 18 M. Andrew Andrade
19 5261 S. Quebec Street
Suite 150
20 Greenwood Village, CO 80111
- 21 Karen Clauson
Eschelon Telecom, Inc.
22 730 2nd Avenue South
Suite 1200
23 Minneapolis MN 55402
- 24 Megan Doberneck
Covad Communications Company
25 7901 Lowry Boulevard
Denver, Colorado 80230
- 26

1 Brian Thomas
2 Vice President Regulatory – West
3 Time Warner Telecom, Inc.
4 223 Taylor Avenue North
5 Seattle, WA 98109

4 Andrea P. Harris
5 Senior Manager, Regulatory
6 Allegiance Telecom Inc. of Arizona
7 2101 Webster, Suite 1580
8 Oakland, CA 94612

7 Curt Hutsell
8 State Government Affaris
9 Electric Lightwave, Inc.
10 4 Triad Center
11 Suite 200
12 Salt Lake City, UT 84180

13
14 
15
16
17
18
19
20
21
22
23
24
25
26