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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

**QWEST CORPORATION'S COMMENTS REGARDING HP'S PO-19B
RECOMMENDATIONS**

Qwest Corporation ("Qwest") hereby submits its comments regarding the recommendations presented by Hewlett Packard ("HP") in its SATE Production Mirror Verification Results Report - PID PO-19B, dated September 18, 2002, Version 3.0 (HP's "PO-19B Report").

I. INTRODUCTION

Staff ruled that HP should evaluate PO-19B as part of its impasse ruling on Issue 943 (Production Mirroring), stating that "HP will provide a third party evaluation of the PID calculation and provide a report on its evaluation."¹ Pursuant to Staff's request, HP evaluated the version of PO-19B that existed at the time it began its evaluation. This approach is consistent with the general approach taken in the 271 proceeding: evaluations

¹ The ACC Staff's 'Impasse Issue: Production Likeness Testing (Master Issue #943)', dated May 8, 2002, at #7.

were performed on existing processes even though those processes may, or even were expected to, change because these evaluations take place in a dynamic environment that will never be static. Thus, while PO-19B was the subject of an impasse in the TAG, HP appropriately evaluated the version of PO-19B that existed when its evaluation began. No TAG member raised a concern regarding this issue during the many TAG discussions of PO-19B.

Significantly, the impasse resolution did not change the process for executing the PID. While that resolution provided a different method for determining the product and activity combinations to include in PO-19B, the process for running those transactions in the SATE and production environments was not affected. Indeed, the product and activity combinations will be separately determined each time PO-19B is calculated. Because the only aspect of PO-19B that changed as a result of the impasse will change each time the PID is run, there is no basis for any suggestion that HP should re-evaluate the PID using the revised version.

Staff also stated that this evaluation and its subsequent report would not be part of the Arizona 271 proceeding.² Even though the report is not part of the proceeding, Qwest provides here its comments regarding HP's recommendations that are part of its final report on its PO-19B evaluation.

II. RECOMMENDATIONS

In its PO-19B report, HP concludes that "Qwest properly calculated the results of PID PO-19B and that Qwest had a 99% success rate on the PID PO-19B Verification."³

² OSS Workshop 10 transcripts, Vol. II – April 18, 2002, Maureen Scott at 17 – 20.

³ HP's PO-19B Report, at ¶1.1.1.

HP thus confirmed that SATE adequately mirrors Qwest's production environment. It is important to note that the FCC has acknowledged that an ILEC's test environment is not required to exactly match the types of products reflected in CLEC production orders.⁴ The TAG acknowledged and discussed the existence of inherent differences between SATE and the production environment, as reflected in the language of PO-19B itself.⁵

HP also presented a set of recommendations based on its evaluation, and further asserts that "Qwest is *conditionally compliant* until such time as HPC's recommendations are implemented to ensure continued accuracy in the calculation of PO-19B and repeatability of the PO-19B process".⁶ Qwest disagrees with this assertion, because nothing in HP's findings supports anything less than a conclusion of "compliant". HP was commissioned to evaluate Qwest's PO-19B PID execution and calculation and provide a report stating whether or not the PID was executed appropriately and calculated accurately. HP provides that it was able to verify the results Qwest calculated, and its report validates that Qwest is appropriately executing, calculating, and reporting PO-19B. Any additional statements concerning 'conditional compliance' are unwarranted based on the outcome of HP's evaluation. Further, the PAP ("Performance Assurance Plan") includes PO-19B and will ensure Qwest's continued compliance in its execution. In addition to assessing payment obligations on Qwest for results that fail to meet standards, the PAP also has provisions for auditing its measurements and for conducting data

⁴ *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services In Georgia and Louisiana*, CC Docket No. 02-35, FCC 02-147, Memorandum Opinion and Order (rel. May 15, 2002), at ¶ 189 (recognizing that an ILEC's test environment is not required to perfectly match its production environment by noting that CLECs could acquire additional test orders "to more closely match a competitive LEC's production orders").

⁵ See PID PO-19B Exclusions and Notes.

⁶ HP's PO-19B Report, at ¶1.5. (Italics added).

reconciliations where CLECs bring evidence that there may be inaccuracies in the results reported. Accordingly, since HP has found that Qwest is presently executing PO-19B properly, PAP mechanisms provide sufficient assurance that this will continue into the future.

Finally, it is important to note that the recommendations underlying HP's finding of conditional compliance relate solely to the future continued accuracy and repeatability of the PO-19B process and are not based on any issue relating to SATE's mirroring the production environment.

Qwest provides responses to each of HP's recommendations below.

A. Quality Assurance

Recommendation 1: Qwest review its PO-19B documentation to ensure that editorial issues are addressed, list any assumptions or risks, reference all appropriate milestones targets all pertinent inputs/outputs, etc. Qwest should place the PID PO-19B documents under its documentation quality control process or have additional emphasis placed on improving the quality of its documentation.

HP's evaluation of PO-19B was Qwest's first execution of the PID and the associated documents and processes. Consequently, both Qwest and HP recognized areas where the documentation required further modifications and clarification. During the course of HP's evaluation, Qwest modified the documentation multiple times in response to internal Qwest and external HP findings, comments, and requests.

Since that time, Qwest has placed its PO-19B documentation under its existing IT wholesale documentation quality control processes. Qwest has ensured that the documents meet the Qwest IT Wholesale Documentation Standards and also included the documents in the Qwest internal document tracking system, known as ILink, on an

ongoing basis. This system provides Qwest with automated version control and document security for each of the PO-19B related documents.

This recommendation has been met.

Recommendation 2: Qwest place PO-19B execution under control of its formal training and documentation processes.

As discussed above, PO-19B related documents have been placed under the existing documentation quality control processes. Additionally, as new team members join the CLEC Implementation team they will receive a copy of the PO-19B process to review with a knowledgeable team member as part of their initial training. This documentation will be given to new team members as part of a set of documents bound specifically for new CLEC Implementation team members; the PO-19B documents are a new addition to this set of documents. This will ensure that the team member is aware of PO-19B and its impacts upon the team. More extensive training in the actual PID activities will be conducted when a team member becomes actively involved in PO-19B. This level of training will include shadowing an existing PID team member while they perform the functions involved in running PO-19B.

This recommendation has been met.

B. Change Management

Recommendation 3: Qwest include the following items in its CMP, the PO-19B Test Suite Spreadsheet creation, the process for tracking of internal PO-19B change requests, and the development/maintenance of Qwest list of acceptable variances.

Qwest disagrees with this recommendation. Qwest's PID administration is separate from Qwest's CMP processes. PID administration was specifically excluded from the scope of CMP, which was fully negotiated and developed by CLECs and Qwest.

Qwest and the CLECs spent well over a year redesigning Qwest's CMP. During that process, Qwest and the CLECs specifically discussed and agreed that PID changes and PID administration do not fall within the scope of CMP.⁷ Instead, the CMP document explicitly recognizes that such issues will be addressed through a separate forum:

The parties acknowledge that the operation of PIDs may be impacted by changes to Qwest OSS Interfaces, products or processes that are within the scope of CMP. Conversely, Qwest OSS Interfaces, products or processes may be impacted by changes to, or the operation of, PIDs that are within the scope of the PID Administration Group. As a result, efficient operation of this CMP requires communication and coordination, including the establishment of processes, between the PID Administration Group and the CMP body.⁸

It is exceedingly inappropriate for HP to make recommendations that require significant modifications to a process that was formally defined by agreement among Qwest and the CLECs. This is particularly true in this instance because the CLECs and Qwest spent considerable time discussing whether PID issues should be handled through CMP and ultimately agreed that they should not.

Further, processes exist for the specific items that HP recommends be included in CMP:

1. The PO-19B Test Suite Spreadsheet creation

Qwest assumes HP is referencing the processes necessary to determine the scope of transactions to be executed for PO-19B. The PO-19B PID details, in note 2, that “the

⁷ The scope of CMP, as set forth in the Qwest Wholesale Change Management Document that can be found at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>, is defined as follows:

CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services (local exchange services) provided by Competitive Local Exchange Carriers (CLECs) to their end users. This CMP is applicable to Qwest's 14-state in-region serving territory.

⁸ Qwest Wholesale Change Management Document, ¶2.6:
<http://www.qwest.com/wholesale/cmp/whatiscmp.html>

product and activity combinations that make up the test decks for PO-19B will be updated after each major IMA release and provided to CLECs with the publication of IMA EDI Draft Interface Technical Specifications for the next major IMA release as defined in the CMP process.” This ensures that CLECs are aware of the set of transactions that will be executed.

2. The tracking of internal PO-19B Change Requests

Qwest has processes for tracking internal change requests. During the testing of PO-19B, Qwest may discover issues that require a fix to either production or SATE. When such an issue is found, Qwest creates an internal change request ("CR") to fix the issue. After issuing the internal CR, the CR follows the CMP Production Support process through the resolution of the CR. This process ensures that the CLECs are notified of any issue that is CLEC-impacting with any known workarounds and the proposed resolution.

3. The development/maintenance of Qwest list of acceptable variances

Qwest has committed to providing variances in two places. Each time Qwest recognizes a new, acceptable variance between results in production and in SATE, it will update the appropriate section of the SATE Data Document,⁹ as it did following the July 2002 execution. Additionally, with the publication of Qwest's PID results, Qwest has included a section in the Summary of Notes for PO-19B which provides a table detailing the variances found for each set of executed transactions.¹⁰

⁹ The SATE Data Document can be found at: <http://www.qwest.com/wholesale/ima/edi/document.html>, and variances follow the 'How to Use This Document' section.

¹⁰ The Regional Report Summary of Notes, Attachment 1 can be found at <http://www.qwest.com/wholesale/results/roc.html>

This recommendation has been met without the incorporation of PO-19B into CMP.

Recommendation 4: Qwest incorporate the scheduling of its PID executions into its IMA release schedule and implementation control.

As detailed in Qwest's discussion regarding Recommendation 3 above, the execution of PIDs has its own processes and does not belong in the IMA release schedule and implementation control. The PO-19B PID details when the set of transactions for this PID must be determined and when this PID must be run. Further, the internal process documentation used by the PID execution team includes all of the necessary processes and steps for interacting with the IMA release manager to insure that the appropriate steps and dates are met.

This recommendation has been met without further incorporation of PO-19B into the IMA release schedule and implementation control.

C. Configuration Management

Recommendation 5: Qwest place all PID PO-19B documents, software, and data under configuration management.

Qwest utilizes SCM Labs Code Management System ("CMS") software configuration management tool to manage the various IMA configurations and associated information. Qwest has begun the process of placing all PO-19B software, and data under the control of this configuration management process. Under this process, Qwest will be able to ensure tighter synchronization between IMA configuration management and SATE configuration management issues. By the time PO-19B is executed for the next major release in April 2003, Qwest will have PO-19B fully under configuration management.

As explained in Qwest's response to Recommendations 1 and 2 above, PO-19B documents have been placed under Qwest's IT Wholesale documentation quality control processes.

D. Transaction Setup

Recommendation 6: Qwest utilize unique control numbers that are consistent with the requirements of the production IMA and production IMA SATE environments.

Since the July 2002 PO-19B execution, Qwest has modified its processes and now utilizes unique control numbers when executing PO-19B. Qwest does not have difficulty in tying the 997 functional acknowledgement to the originating 850 order when executing the PID because it utilizes its Multiple Mailbox software, but recognizes that HP did have difficulty as a third party evaluator.

It should be noted that CLECs do not have this issue because CLECs generate the control numbers on their incoming transactions. When Qwest receives the incoming transaction, Qwest merely echoes the control number on the 997. A CLEC determines whether it needs to send a unique control number to tie the 997 to the originating order. Like Qwest, CLECs may have other means than the control number to do so.

This recommendation has been met.

Recommendation 7: Qwest should develop and maintain the SATE Data Document for PO-19B on an ongoing basis.

The SATE Data Document was developed to provide the CLEC community the data needed to correctly process transactions in SATE. The format and content of this document is designed to accomplish this goal. Qwest uses a different set of data for PO-19B than is provided in the SATE data document.

For PO-19B, Qwest developed a simpler spreadsheet, the PO-19B Test Data Spreadsheet, that provides the information needed for the PO-19B run. This spreadsheet provides the scenario number, the scenario description, the SATE Data Document scenario number for a similar scenario, the relevant input data, and the expected results for all transactions in the PO-19B run.

During HP's audit of PO-19B, HP requested that Qwest create a version of the data document for HP's use. Based upon HP's previous experience testing SATE, HP was accustomed to using the data document format to understand SATE transactions. To help HP in its audit, Qwest created a version of the document with the PO-19B data. However, Qwest did not use this document during the PO-19B run, nor is it part of the PO-19B process.

HP suggests creating a PO-19B data document, but does not provide strong reasoning explaining why the creation of such a document would improve the reliability of the PO-19B results. After reviewing HP's report, only the following statements appear to form the basis for HP's recommendation of a PO-19B data document:

1. "The SATE Data Document for PO-19B provides the EDI field/element values which are specific to the EDI input for PO-19B and was required because the PO-19B Test Suite Spreadsheet and the Test Data were not detailed enough to define/verify the EDI input." (PO-19B Report, section 1.3, p. 9)

To verify that the data used by Qwest in the PID execution was accurate, HPC needed to understand the data at the detailed level shown in the data document. However, the PO-19B Test Data provides Qwest with the data needed to successfully populate the PO-19B transactions.

2. "HPC asked Qwest to publish a PO-19B SATE Data Document to maintain consistency to a CLECs testing process since they were not using the Production SATE Data Document for the PO-19B execution." (PO-19B Report, section 4.3.2, p. 33)

Because the data for PO-19B differs from the data in the SATE data document, the production SATE Data Document cannot be used for PO-19B execution. However, in the PO-19B Test Data Spreadsheet, Qwest shows the link between the production SATE Data Document scenario and the PO-19B scenario. This allows Qwest to ensure that the scenarios run for PO-19B have the same intent as the scenarios run by CLECs as part of testing in SATE. There will be no additional benefit for creating a document for this purpose.

HP's report contains no other possible reasons that Qwest should create a separate version of the data document for PO-19B. In addition, HP states in section 4.4.3 that "The PO-19B Test Data Spreadsheet takes the places of the SATE data document." The PO-19B Test Data Spreadsheet sufficiently provides the information needed for the PO-19B execution. As the PO-19B Test Suite Spreadsheet document provides the data needed to execute PO-19B, a special PO-19B version of the SATE data document is unnecessary.

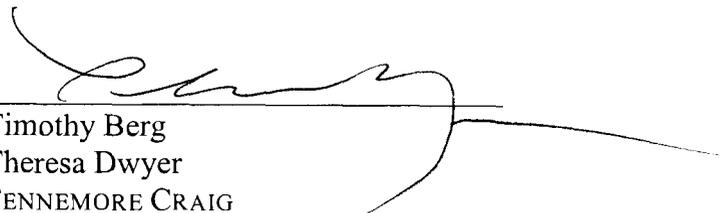
Accordingly, because the existing documentation already addresses HP's concerns, the substance of this recommendation has already been met.

III. CONCLUSION

HP concluded that Qwest is properly calculating PO-19B with a 99% success rate. Thus, SATE adequately mirrors Qwest's production environment. Nothing in HP's recommendations detracts from this conclusion. Instead, HP's recommendations relate only to ensuring the continued accuracy and repeatability of the PO-19B process on a

going forward basis. Qwest has already satisfied the substance of all of HP's recommendations, with only two minor exceptions. HP's recommendation to include PO-19B issues in CMP is inappropriate because the process already specifically excludes PID issues. However, as discussed above, non-CMP processes exist to address HP's concerns regarding the three issues HP raised. Finally, Qwest has already placed PO-19B documents under Qwest's IT Wholesale documentation quality control processes, and will place PO-19B software, documents, and data under configuration management by April 2003.¹¹ Therefore, Qwest has substantially complied with HP's recommendations, thus satisfying the conditions HP placed on its findings. Qwest has established its compliance -- without condition -- in calculating and reporting PO-19B results.

RESPECTFULLY SUBMITTED this 26th day of November, 2002.



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¹¹ Qwest will report on the status of this effort in its quarterly SATE status reports.

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

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