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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 FINAL QUARTERLY STATUS REPORT  
 ON THE SATE RECOMMENDATIONS**

Qwest Corporation ("Qwest") hereby submits this final SATE status report as requested in the Arizona Corporation Commission (the "Commission" or "ACC") Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements - Operational Support System Requirements, dated May 1, 2002 (Staff's "Recommendation Report").

**I. INTRODUCTION**

Staff's Recommendation Report includes a SATE recommendation that "Qwest should be required to report to the Commission on a quarterly basis, the status on its progress in implementing the recommendations of Staff and HP".<sup>1</sup> In Qwest's filed

<sup>1</sup> Recommendation at ¶106.

comments, Qwest committed to providing quarterly reports beginning on June 30, 2002 to address the status of the recommendations.<sup>2</sup>

HP submitted nine recommendations in its SATE Summary Evaluation Report and four recommendations in its SATE New Release Test Summary Report. Staff submitted three additional SATE recommendations.

As stated in the prior status reports,<sup>3</sup> Qwest has fully implemented or otherwise addressed all but two of the recommendations. The remaining recommendations relate to finalizing the PO-19 PID, which was previously awaiting final written ruling by the ACC Staff. This serves as the fourth and last quarterly report and provides closure status for both of the remaining recommendations.

## **II. STATUS OF TWO REMAINING RECOMMENDATIONS**

### **A. RECOMMENDATIONS FROM HP'S SATE SUMMARY EVALUATION REPORT**

- 1. Recommendation 8: HP recommends that a SATE performance standard be developed for Arizona that addresses the need for Qwest to demonstrate that the SATE remains an adequate mirror image of production as OSS systems evolve. In reviewing this standard, the ACC may wish to consider the nature and volume of transactions that are executed in production.**

At the time this recommendation was made, Qwest had already proposed a measurement that subsequently was adopted by the Arizona TAG, satisfying this recommendation.

Qwest developed a SATE performance measure, PO-19 – Stand-Alone Test Environment (SATE) Accuracy.<sup>4</sup> The language of this measure has been agreed and its

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<sup>2</sup> Qwest Corporation's Comments Regarding CGE&Y's Final Report of the Qwest OSS Test and Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item NO. 2 Operation Support System Requirements; Section 5c.

<sup>3</sup> Qwest Corporation's Quarterly Status Report on the SATE Recommendations, dated June 28, 2002 and Qwest Corporation's Quarterly Status Report on the SATE Recommendations, dated September 27, 2002

<sup>4</sup> Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

purpose is to “evaluate Qwest’s ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the SATE environment.”<sup>5</sup>

The Arizona SATE PID was developed by consensus with the CLECs. However, the standard for this measure was not determined until later, and was set at 95%. Qwest began reporting this measure with November 2001 results in the December 2001 reports.

Additionally, based on further CLEC input, Qwest proposed a modification to PO-19, which includes a new sub-measure to execute the same transactions in production and in SATE, to further measure the extent to which SATE mirrors production. Qwest began publishing results for this new sub-measure, PO-19B, with July data in August 2002. The July execution produced results of 99% against a 95% benchmark.

However, the method for determining what product/activity combinations to be used for PO-19B on an ongoing basis has been at impasse in Arizona. Qwest determines what product/activity combinations to execute based on a 95% volume threshold – all product/activity combinations with CLEC commercial volumes that fall into the top 95% of the overall volume totals for the most recent 12-month period are used. AT&T and WorldCom brought this issue to impasse in Arizona. They believe that they should have further input into the transaction mix, ensuring that product/activities that account for less than 5% of the overall CLEC volume in a given 12-month period can be included in the PID execution as well.

Since that time, Qwest developed a modified proposal, to which AT&T has agreed.<sup>6</sup> Under this proposal, PO-19B will include all product/activity combinations for which there have been 100 or more EDI transactions during the prior 12-month period.<sup>7</sup>

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<sup>5</sup> Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

On February 27, 2003, Staff issued an updated Impasse Resolution statement, which confirms that Qwest's proposals "are very responsive to the CLEC's concerns and provide for ensuring that SATE mirrors the production environment."<sup>8</sup> Staff ordered Qwest "to implement its proposals for adding product and activity combinations to the services examined as part of the PO-19B measure and for adding products that are currently being ordered in production to the SATE environment," and further requested that "Qwest formalize the PO-19B resolution into a PID document for PO-19B".<sup>9</sup>

Qwest submitted an updated PO-19B PID to the CLECs for review and approval on January 14, 2003, following discussion on the TAG meeting that occurred the same day. Based on this updated version, both Worldcom and AT&T accepted the updated language in the PID.<sup>10</sup>

Staff acknowledged that this issue is resolved in its February 25, 2003 Staff Report, stating that the "Qwest proposal resolved the Arizona TAG impasse since it satisfied the CLEC concerns. Staff believes this issue is therefore resolved."<sup>11</sup>

This recommendation has been met.

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<sup>6</sup> See Qwest's Response to AT&T's Comments on Hewlett Packard's Recommendation on PO-19B Impasse Issue and Recommendation Regarding SATE Products Impasse Issue, filed September 16, 2002. AT&T indicated its agreement with that proposal in a September 30, 2002, e-mail from John Finnegan which was distributed to the TAG.

<sup>7</sup> Qwest SATE Impasse Comments at 2-3

<sup>8</sup> ACC Impasse Resolution: PO-19B, dated January 6, 2003, at para. VII. Note that Staff provided an updated Impasse Resolution document on February 27, 2003 at Qwest's request to further clarify that both items at impasse (the PO-19B PID definition and the inclusion of products in SATE) were resolved based on Qwest's proposals.

<sup>9</sup> See *id.*

<sup>10</sup> WorldCom indicated its acceptance of the PID language in an email Liz Balvin provided to the TAG on February 7, 2003, and AT&T indicated its acceptance of that language in an email John Finnegan provided to the TAG on February 10, 2003.

<sup>11</sup> ACC Report on the July 30 - 31 Workshop, dated February 25, 2003, at para. 223.

**B. RECOMMENDATIONS FROM HP'S SATE NEW RELEASE TEST SUMMARY REPORT**

**1. Recommendation 2: Supporting documentation be provided to more clearly clarify the calculations and measurement process of PID PO-19.**

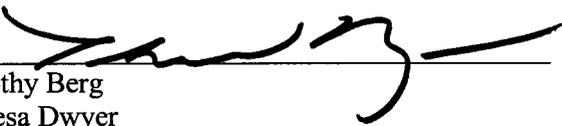
As detailed above the Arizona TAG has accepted Qwest's revised PID with the proposed updates to PO-19 to include a sub-measure to further measure production likeness. As is standard with all proposed PID changes, the TAG members collaboratively reviewed and approved the proposed language, including the level of detail describing the calculations and measurement process.

This recommendation has been met.

**C. CONCLUSION**

As detailed in this report, the remaining two SATE recommendations have been fully implemented. No further SATE status reports are necessary.

RESPECTFULLY SUBMITTED this 6<sup>th</sup> day of March, 2003.



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