



0000111821

ORIGINAL

RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION

2004 JAN 29 P 4: 31

MARC SPITZER
Chairman
WILLIAM A. MUNDELL
Commissioner
KRISTEN K. MAYES
Commissioner
MIKE GLEASON
Commissioner
JEFF HATCH-MILLER
Commissioner

Arizona Corporation Commission

DOCKETED

JAN 29 2004

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY

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

Docket No. T-00000A-97-0238

**QWEST CORPORATION'S
FOURTH QUARTERLY FILING
OF ACTUAL CLEC EDI RESPONSE
TIMES**

DEC # 64888

Qwest Corporation (Qwest) hereby provides aggregated actual CLEC EDI response times for the months of October, November, and December 2003, produced in compliance with the Arizona Corporation Commission Staff's Impasse Issue #940 Resolution: Use of IRTM for PID PO-1B. In this resolution, Staff required Qwest to develop the capability to report actual CLEC Pre-Order/Order Response Times for EDI transactions at Qwest's Interactive Agent (IA) by year end 2002, and to track these results with PO-1B until the 18 and/or 24 month review, at which time a decision will be made whether to modify the PIDs to utilize EDI response times as measured at the Qwest IA.¹

On February 12, 2003, Qwest filed its Notice of Compliance Regarding CLEC Actual EDI Response Times (Notice of Compliance), confirming that Qwest had developed the required capability to report actual CLEC Pre-Order/Order response times for EDI transactions and proposing that the monthly aggregated results be reported on a quarterly basis until the 18 and/or 24 month review. Accordingly, Qwest submits this

¹ Staff's Impasse #940 resolution: Use of IRTM for PID PO-1B at section E.

1 fourth quarterly filing of CLEC aggregated EDI response times. The results for each
 2 month in the fourth quarter of 2003 are listed below.

3 **Transactions for CLECs on all Releases Compared to IRTM Transactions - October 2003**

CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg	IRTM	Differences
		Obs.	Time	Process	Process	IA Process	Avg.	
			(1)	Time	Time		Time	
				(Inbound)	(Outbound)	(1) - (2) - (3)	(4)	
				(2)	(3)			
All CLECs	ADDRVAL	294543	4.018	0.721	0.281	3.016	3.64	-0.624
(Excluded all	SERVAVAIL	0	N/A	N/A	N/A	N/A	9.06	N/A
Internal Trading	CSR	351219	4.47	0.686	0.236	3.548	3.45	0.098
Partners								
(IRTM))	APPTSCHED	2602	4.512	0.526	0.182	3.804	3.45	0.354
	TN	8175	7.799	0.547	0.171	7.081	7.23	-0.149
	FACCHECK	5840	10.267	0.732	0.176	9.359	6.14	3.219
	LOOPQUALTOOLS	1798	12.863	2.195	1.019	9.649	14.03	-4.381
	RESALELOOPQUAL	0	N/A	N/A	N/A	N/A	6.74	N/A
	CFA	2	7.331	0.352	0.101	6.878	8.79	-1.912
	MPQ	0	N/A	N/A	N/A	N/A	5.77	N/A

15 **Transactions for CLECs on all Releases Compared to IRTM Transactions - November 2003**

CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg	IRTM	Differences
		Obs.	Time	Process	Process	IA Process	Avg.	
			(1)	Time	Time		Time	
				(Inbound)	(Outbound)	(1) - (2) - (3)	(4)	
				(2)	(3)			
All CLECs	ADDRVAL	229349	4.044	0.75	0.288	3.006	3.42	-0.414
(Excluded	SERVAVAIL	0	N/A	N/A	N/A	N/A	8.51	N/A
all								
Internal	CSR	452197	4.576	0.802	0.243	3.531	3.3	0.231
Trading								
Partners								
(IRTM))	APPTSCHED	2409	4.674	0.536	0.178	3.96	3.49	0.47
	TN	6602	7.735	0.551	0.15	7.034	6.84	0.194
	FACCHECK	4891	10.044	0.692	0.163	9.189	6.38	2.809
	LOOPQUALTOOLS	1543	13.324	2.199	1.079	10.046	13.91	-3.864
	RESALELOOPQUAL	0	N/A	N/A	N/A	N/A	7.36	N/A
	CFA	9	7.458	0.42	0.17	6.868	8.7	-1.832
	MPQ	0	N/A	N/A	N/A	N/A	5.66	N/A

Transactions for CLECs on all Releases Compared to IRTM Transactions - December 2003								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg	IRTM	Differences
		Obs.	Time	Process	Process Time	IA Process	Avg.	
			(1)	Time	(Inbound)	(Outbound)	Time	
				(2)	(3)	(1) - (2) - (3)	(4)	
All CLECs	ADDRVAL	205089	4.59	0.936	0.538	3.116	3.36	-0.244
(Excluded all	SERVAVAIL	0	N/A	N/A	N/A	N/A	8.2	N/A
Internal Trading	CSR	253058	4.975	0.792	0.482	3.701	3.83	-0.129
Partners								
(IRTM))	APPTSCHED	3195	4.605	0.528	0.163	3.914	3.48	0.434
	TN	6801	6.909	0.543	0.199	6.167	5.77	0.397
	FACCHECK	5074	9.608	0.653	0.155	8.8	6	2.8
	LOOPQUALTOOLS	1987	15.438	2.888	2.377	10.173	15.21	-5.037
	RESALELOOPQUAL	0	N/A	N/A	N/A	N/A	9.11	N/A
	CFA	17	8.974	0.393	0.13	8.451	9.11	-0.659
	MPQ	0	N/A	N/A	N/A	N/A	5.45	N/A

The results show aggregated CLEC actual response times with and without IA processing time. Please note that N/A stands for not applicable and indicates that no CLEC issued those types of queries during the month. As stated in the Notice of Compliance, Qwest is providing the results in this manner to allow for an accurate comparison of the results from actual transactions with results from IRTM transactions, since the processing time at the IA, as captured in actual transactions, is directly impacted by a CLEC's selection of hardware and software.

As Qwest has previously stated, the type of hardware a CLEC chooses can directly impact the transaction measurements. For example, if a CLEC uses nonstandard configurations, a slower server, or slower than normal network connections, then that CLEC's results will be much greater than those of a CLEC using more efficient hardware. Additionally, because the time period measured does not end until Qwest receives an acknowledgement from the CLEC, the response time will be longer if a CLEC's IA takes longer to send the acknowledgement. Further, it is possible for a CLEC to structure

1 certain queries in a way that increases the processing time, e.g., by including multiple
2 lines in a single ADSL Loop Qualification query.

3 Qwest has excluded response times from IMA's internal production load, release
4 and pre-start testing. These transactions are similar to Qwest's internally generated IRTM
5 transactions, except they are used to verify a major release, check systems performance
6 and load levels, or pretest all systems during system maintenance windows before
7 accepting co provider transactions. Since these transactions are easily identified due to the
8 unique co provider identifiers used, and are not CLEC transactions they are not included
9 in the quarterly measurements. Any active production co provider sending data during a
10 production load test would still have all their data measurements reported.

11 In conclusion, Qwest has complied with the Staff's Impasse Resolution to develop
12 the capability to measure actual EDI transactions by year-end 2002.

13 Qwest now provides, with this filing the results for the fourth quarter of 2003.

14 RESPECTFULLY SUBMITTED this 30th day of January 2004.

15
16 
17 Timothy Berg
18 Theresa Dwyer
19 FENNEMORE CRAIG
20 3003 North Central Avenue
21 Suite 2600
22 Phoenix, AZ 85012-2913

23 ORIGINAL and 13 copies hand-delivered for
24 filing this 30th day of January, 2004 to:

25 Docket Control
26 ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

1 COPY of the foregoing hand delivered
2 this 30th day of January, 2004 to:

3 Maureen A. Scott
4 Legal Division
5 ARIZONA CORPORATION COMMISSION
6 1200 W. Washington St.
7 Phoenix, AZ 85007

8 Ernest G. Johnson, Director
9 Utilities Division
10 ARIZONA CORPORATION COMMISSION
11 1200 W. Washington St.
12 Phoenix, AZ 85007

13 Lyn Farmer, Chief Administrative Law Judge
14 Jane Rodda, Administrative Law Judge
15 Hearing Division
16 ARIZONA CORPORATION COMMISSION
17 1200 W. Washington
18 Phoenix, AZ 85007

19 COPY of the foregoing mailed
20 this 30th day of January, 2004 to:

21 Eric S. Heath
22 SPRINT COMMUNICATIONS CO.
23 100 Spear Street, Suite 930
24 San Francisco, CA 94105

25 Thomas Campbell
26 LEWIS & ROCA
40 N. Central Avenue
Phoenix, AZ 85004

Joan S. Burke
OSBORN MALEDON, P.A.
2929 N. Central Ave., 21st Floor
PO Box 36379
Phoenix, AZ 85067-6379

- 1 Thomas F. Dixon
WORLD.COM, INC.
2 707 N. 17th Street #3900
3 Denver, CO 80202

- 4 Scott S. Wakefield
RUCO
5 1110 West Washington, Suite 220
6 Phoenix, AZ 85007

- 7 Michael M. Grant
8 Todd C. Wiley
GALLAGHER & KENNEDY
9 2575 E. Camelback Road
10 Phoenix, AZ 85016-9225

- 11 Michael Patten
ROSHKA, HEYMAN & DEWULF
12 400 E. Van Buren, Ste. 900
13 Phoenix, AZ 85004-3906

- 14 Mark DiNuzio
COX COMMUNICATIONS
15 20402 North 29th Avenue
16 Phoenix, AZ 85027-3148

- 17 Daniel Waggoner
18 DAVIS, WRIGHT & TREMAINE
2600 Century Square
19 1501 Fourth Avenue
20 Seattle, WA 98101

- 21 Traci Grundon
22 DAVIS, WRIGHT & TREMAINE
1300 S.W. Fifth Avenue
23 Portland, OR 97201

- 24
25
26

1 Richard S. Wolters
2 Maria Arias-Chapleau
3 AT&T Law Department
4 1875 Lawrence Street, #1575
5 Denver, CO 80202

6 Diane Bacon, Legislative Director
7 COMMUNICATIONS WORKERS OF AMERICA
8 5818 N. 7th St., Ste. 206
9 Phoenix, AZ 85014-5811

10 Philip A. Doherty
11 545 S. Prospect Street, Ste. 22
12 Burlington, VT 05401

13 W. Hagood Bellinger
14 4969 Village Terrace Drive
15 Dunwoody, GA 30338

16 Joyce Hundley
17 U.S. DEPARTMENT OF JUSTICE
18 Antitrust Division
19 1401 H Street N.W. #8000
20 Washington, DC 20530

21 Andrew O. Isar
22 TELECOMMUNICATIONS RESELLERS ASSOC.
23 4312 92nd Avenue, NW
24 Gig Harbor, WA 98335

25 Raymond S. Heyman
26 ROSHKA, HEYMAN & DEWULF
400 N. Van Buren, Ste. 800
Phoenix, AZ 85004-3906

Thomas L. Mumaw
SNELL & WILMER
One Arizona Center
Phoenix, AZ 85004-0001

1 Mike Allentoff
2 GLOBAL CROSSING SERVICES, INC.
3 1080 Pittsford Victor Road
4 Pittsford, NY 14534

5 Michael Morris
6 Allegiance Telecom of Arizona, Inc.
7 505 Sansome Street, 20th Floor
8 San Francisco, CA 94111

9 Gary L. Lane, Esq.
10 6902 East 1st Street, Suite 201
11 Scottsdale, AZ 85251

12 Kevin Chapman
13 SBC TELECOM, INC.
14 1010 N. St. Mary's, Room 1234
15 San Antonio, TX 78215-2109

16 Richard Sampson
17 Z-TEL COMMUNICATIONS, INC.
18 601 S. Harbour Island, Ste. 220
19 Tampa, FL 33602

20 Megan Doberneck
21 COVAD COMMUNICATIONS COMPANY
22 7901 Lowry Boulevard
23 Denver, CO 80230

24 Richard P. Kolb
25 Vice President of Regulatory Affairs
26 ONE POINT COMMUNICATIONS
Two Conway Park
150 Field Drive, Ste. 300
Lake Forest, IL 60045

Attorney General
OFFICE OF THE ATTORNEY GENERAL
1275 West Washington
Phoenix, AZ 85007

26

1 Steven J. Duffy
2 RIDGE & ISAACSON, P.C.
3 3101 North Central Ave., Ste. 1090
4 Phoenix, AZ 85012

4 Karen Clauson
5 ESCHELON TELECOM
6 730 Second Avenue South, Ste. 1200
7 Minneapolis, MN 55402

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

11 Brian Thomas
12 Time Warner Telecom, Inc.
13 223 Taylor Avenue North
14 Seattle, WA 98109

14 David Kaufman
15 ESPIRE Communications
16 1129 Paseo De Peralta
17 Santa Fe. NM 87501

17 Mitchell F. Brecher
18 Greenberg Traurig, LLP
19 800 Connecticut Avenue, NW
20 Washington, DC 20006

20 Tobin Rosen
21 Principal Asst. City Attorney
22 Office of the Tucson City Attorney
23 255 W. Alameda- Seventh Floor West
24 Tucson, AZ 85701

24 Patrick A. Clisham
25 AT&T Arizona State Director
26 320 E. Broadmoor Court
Phoenix, AZ 85022



1507091.1/67817.150