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Arizona Corporation Commission  
**DOCKETED**

SEP 29 1997

DOCKETED BY

Re: Consolidated Dockets No. U-3021-96-448. Et. Al.

Late in the day on September 22, 1997 the CLEC parties in this proceeding received the first draft report of the proposed joint filing that U S WEST had proposed in its letter of September 15, 1997. On September 23, 1997, U S WEST provided the CLEC parties with a copy of the U S WEST Arizona Interconnect Data Dictionary. The CLECs have since analyzed those two documents.

Rather than responding individually, as per your request in your September 15, 1997 letter to the parties, the CLECs have decided to provide a joint response. While the CLECs appreciate U S WEST's efforts in producing these two documents, we were disappointed to find that the U S WEST proposal falls far short of complying with the Procedural Order. The U S WEST proposed response fails to comply with the Procedural Order in several significant respects. The CLECs will not take the time here to, on an individual measure by measure basis, point out the inadequacies of the U S WEST proposed draft. Instead, we will point out the major deficiencies.

The first deficiency is that in spite of the Chief Arbitrator's decision that the measures contained in Exhibit A of the Procedural Order are appropriate, U S WEST has indicated that it will not provide measurement information for 27 of the 52 measures in Exhibit A.

The second and equally glaring deficiency is that for several of the Exhibit A measures, U S WEST provided incomplete responses. While it may appear that U S WEST was being responsive to the Chief Arbitrator's request, upon closer examination it can be seen that only partial responses have been provided. For example, the OP-1 Requested Service Order Standard Due Date Met measure establishes standard provisioning intervals for both resold services and unbundled network elements. The U S WEST draft only includes measures for POTS residence and POTS business services. The U S WEST draft includes no information on Unbundled Network Elements or resold design services for the OP-1 measure. Similar partial responses are found throughout the U S WEST draft.

Particularly troubling was the almost complete lack of any measures information provided for Unbundled Network Elements. U S WEST does make reference to LIS-Trunk for five<sup>1</sup> of the measures. However, contrary to the Procedural Order, U S WEST failed to propose measures for Unbundled Loops or any other Unbundled Network Elements.

The final major deficiency is U S WEST's failure to provide any information on its existing performance levels and performance standards. The Procedural Order clearly addresses the need for this information to be produced when it states:

"At the conclusion of the hearings on this matter, it was determined that a Procedural Order would be issued indicating which measures are appropriate, after which the parties would report U S WEST's existing performance level for each of the designated measures, existing performance standards (both U S WEST's internal and Commission-required) if they exist, and proposed standards if neither of the above is determinable."<sup>2</sup> (*emphasis added*)

The U S WEST draft fails to provide any of its existing performance levels and existing performance standards.

Rather than attempt to correct the substantial flaws in the U S WEST draft, the CLEC parties will assume the responsibility for producing a matrix that provides a template which will better allow the parties to be responsive to the Procedural Order. This matrix will include columns for:

- The measures contained in Exhibit A
- The description of the measure
- The CLEC's proposal on measurement methodology
- U S WEST's proposal on measurement methodology
- Whether the parties agree on the measurement methodology
- The U S WEST existing performance level for the measure
- The U S WEST and/or Commission-ordered performance standard for the measure or proposed standard if the preceding do not exist

The CLECs believe that the proposed matrix will provide the necessary information and level of detail required by the procedural order. It will also be a useful tool as the parties negotiate any areas of disagreement. The CLECs will provide a copy of the

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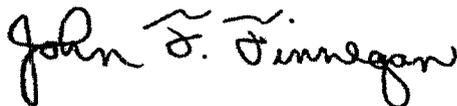
<sup>1</sup> LIS-Trunk was mentioned as part of the US WEST proposal for OP-3 Order Status Updates, MR-1 Time to Restore, MR-3 Repeat Troubles, GP-1 Appointments Missed, and NP-10 Interconnection Trunk Grade of Service.

<sup>2</sup> Before the Arizona Corporation Commission; Docket No. U-3021-96-448 et. al.; Procedural Order; page 3; lines 13 - 17

matrix to U S WEST by October 2, 1997. The matrix will include completed information for the first five columns. The U S WEST information on the measurement methodology will be obtained from the U S WEST proposal and/or the data dictionary. The CLECs are hopeful that this matrix can become the basis for the joint filing required by the procedural order.

It is apparent that there is still major disagreement about what constitutes compliance with the Procedural Order. To address these disagreements, the CLECs feel that a conference call between the parties would be a reasonable next step. Please contact me at (303) 298-6335 and so we can arrange a mutually acceptable date and time.

Sincerely,



John F. Finnegan  
for the CLEC Parties<sup>3</sup>

cc:

Jerry Rudibaugh  
Chief Arbitrator  
Arizona Corporation Commission  
All Parties of Record

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<sup>3</sup> The CLEC parties are AT&T Communications of the Mountain States, MCImetro Access Transmission Services, Inc., Sprint Communications Company, L.P., TCG Phoenix, Cox Arizona Telecom, Inc., American Communications Services Inc., GST Tucson Lightwave, Inc., Brooks Fiber Communications of Tucson, Inc., and Electric Lightwave, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of the Correspondence regarding U S WEST's Arizona Interconnect Data Dictionary on behalf of AT&T Communications of the Mountain States, Inc., regarding Docket No. U-3021-96-448 ET AL, were sent via overnight mail on the 26<sup>th</sup> day of September, 1997, to:

Arizona Corporation Commission  
Docket Control - Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

and a true and correct copy was sent via overnight mail on the 26<sup>th</sup> day of September, 1997 to:

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