

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL

Chairman

JAMES M. IRVIN

Commissioner

MARC SPITZER

Commissioner

**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**
)
) **AT&T'S LIST OF PRIORITY CMP**
) **ISSUES**
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AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T") hereby file their list of priority issues regarding the Change Management Process ("CMP") of Qwest Corporation ("Qwest"). At the Arizona Workshop held on February 25, 2001, the Arizona Corporation Commission Staff requested that AT&T identify the open CMP Redesign¹ issues that must be closed prior to Qwest obtaining section 271 approval. TR. 232 (Feb. 25, 2002).

As AT&T stated in its comments filed with the Commission on February 19, 2002 ("AT&T's February CMP Comments"), there are a large number of significant issues that remain open and need to be closed (by agreement or impasse resolution) before Qwest may be considered to meet the FCC's requirements for an effective change management process. It is very difficult to draw a line placing the necessary items "above the line" and other items "below the line." There are definitely issue that alone are significant enough that, without resolution, Qwest's CMP cannot be considered in compliance with

section 271. There are other issues that *individually* may not justify a finding of non-compliance with section 271 but when considered as a group, in whole or in part, justify a finding of non-compliance with section 271.² In addition, because a good deal of work must still be done to redesign CMP, the parties have not yet identified all issues. These as yet unidentified issues may be significant as well.

The following is AT&T's attempt to identify the most critical CMP issues that must be resolved prior to finding that Qwest's CMP complies with the FCC's section 271 requirements. The following references to "Part ____" are to AT&T's February CMP Comments. For a fuller description of the issues described under the Parts, please see AT&T's February CMP Comments.

I. Part A. AT&T considers all of the issues identified in Part A of AT&T's February CMP Comments as necessary for section 271 approval.³ AT&T's attempt at prioritizing these issues follows; however, please note that many of these issues are very close in their levels of importance:

A.2. State the criteria for Deny (reasons why) for the CR process. (CMP Issues Log #118; CMP Gap Analysis # 59.)

A.4. What are the criteria used to determine "level of effort" (*i.e.*, S, M, L, XL) for a release? (CMP Issues Log # 146.)

A.8. Qwest proposed to re-visit Regulatory type of changes to address performance measure obligations. (CMP Issues Log #169.) This includes the impasse issue briefed in Part D of AT&T's February CMP Comments.

¹ SATE is not being addressed in CMP Redesign and for that reason is not cited in this summary of issues. However, SATE must meet the Federal Communication Commission's ("FCC") requirements before this component of Qwest's CMP may be evaluated favorably.

² These issues are not incorporated herein but may be found in AT&T's February CMP Comments, including the exhibits thereto.

³ Note that AT&T boiled down a twenty-three page open issues list (the CMP Issues Log) to arrive at these twelve issues. Some of these issues are further described in the CMP Gap Analysis.

A12. Qwest to propose language on the criteria used to determine method of implementing regulatory changes. (CMP Issues Log # 243.)

A.9. Provide a decision on whether to provide copies of documentation regarding prioritization and sizing. (CMP Issues Log # 196.) This issue includes completion of the prioritization process within CMP (CMP Gap Analysis ## 117 – 120 & 124.)

A.7. Where will a CR that impacts both an OSS interface and process be addressed – at the Systems or Product/Process CMP Meeting? We will need to develop language to address this issue. (CMP Issues Log # 163.) Embedded in this issue is Part B of AT&T's February CMP Comments: product/process must be addressed at least to the extent that there is a process to handle crossover issues.

A.6. What is the process to manage changes to performance reporting calculations, etc.? How do we handle the overlaps between what is being negotiated at the CMP Redesign and CPAP-like procedures? (CMP Issues Log # 158.) This includes establishing a process connection between PIDs and CMP as described in Part F of AT&T's February CMP Comments.

A.10. Qwest to outline what the guidelines are for when an issue is appropriate for the CMP vs. when the Account team should handle it. (CMP Issues Log # 216.)

A.1. Review the CR initiation process to insure that the description of the output of each step of the process is clearly defined; *i.e.*, LOE (range of hours) and affinity. (CMP Issues Log #214; CMP Gap Analysis ## 121 – 123.)

A.3. Determine whether a process is necessary to address non-coding changes. (CMP Issues Log #137.)

A.11. What is the status of a change when the escalation or dispute resolution is invoked? (CMP Issues Log # 226.) Embedded within this issue is the imbalance in treatment that CLEC CRs receive versus Qwest CRs. (CMP Gap Analysis # 20.)

A.5. Clarify what notices will be communicated to CLECs via email, mail-outs, communiqués, and posted on the web site. (CMP Issues Log # 156.) This also relates to CMP Gap Analysis # 101: “We continue to receive notices for scheduled system downtime on too short notice (*i.e.*, on 1/10/02 at 5:30 p.m. received notice on DLIS being down 1/12/02 all day). We have discussed in Redesign having Qwest provide these notices further in advance. We would like to receive them at least 5 business days in advance.”

II. Part C. The Regional Oversight Committee (“ROC”) OSS Test. The ROC test of CMP is being handled differently from the Arizona test of CMP because CGE&Y has not conducted an evaluation of the Qwest Change Management process consistent with the requirements of the Master Test Plan (“MTP”) and the Test Standards Document (“TSD”). Both Arizona and ROC tests call for the tests to be comprehensive evaluations of the CMP process that Qwest employs. CGE&Y evaluated the prior process and found it wanting in limited areas and went no further to conduct the range of tests called for by the Arizona testing requirements. The ROC tester has been diligent in its analysis of the CMP and its use by Qwest. There can be no question that the ROC test has identified a number of significant deficiencies in Qwest’s CMP. AT&T believes that resolution of the outstanding Observations and Exceptions in the ROC is required for section 271 approval chiefly because CGE&Y has not conducted the appropriate range of CMP tests called for in the MTP and the TSD. Although the ROC test is separate from the Arizona test, the Arizona Commission should take notice of the ROC Observations and Exceptions and derive the benefit from their resolution by ROC .

ROC Testing Requirements for CMP (MTP Version 5.1):

Section 23.1 Description (emphasis added)

This test *evaluates Qwest’s methods and procedures for managing changes to and change requests for OSS interfaces and business processes utilized by CLECs*. This test will review Qwest’s co-provided industry change management process (CICMP). The test will rely on inspection and review of Qwest documentation and on CLEC interviews.

23.2 Objective

The objective of this test is to determine the adequacy and completeness of procedures for developing, publicizing, conducting, and monitoring change management.

AZ Testing Requirements for CMP (MTP) Section 7.2.5 (emphasis added):

The Change Management Process Evaluation is an evaluation by the Test Administrator with involvement by Qwest, the CLECs, and the Pseudo-CLEC. The Methods and Procedures (M&P) established by Qwest will be acquired. *Qwest will be monitored and evaluated on its adherence to its published M&P for change management.* Following the collection of documentation, the Test Administrator will identify, discuss, and track available instances of specific OSS Interface new functionality, enhancements and maintenance.

The fact that the separate tests have the same fundamental requirements for the Test Administrator to conduct (italicized passages in the above), and the ROC test is yielding different results than those produced in the Arizona test, requires that the dissimilarity in results be explained.

CGE&Y's recently released Draft Final Report on the Qwest Change Management Process Redesign Evaluation Report (February 21, 2002) fails to provide answers to the issues raised in the TSD, pertinent to the redesigned process. As CGE&Y states, "This report describes the efforts CGE&Y undertook to evaluate Qwest's efforts to re-design its change management process." *CMP DFR at 3.* It does not provide information sufficient to rehabilitate the voids in the CGE&Y Draft Final Report regarding Relationship Management.

During testing CGE&Y found the CICMP to be deficient, issuing IWOs 1075, 1076, and 1078. It only concludes the process has been improved. It makes no conclusions about the adequacy of Qwest's CMP. AT&T can only conclude that the review of Qwest's CMP is incomplete and the Draft Final Report premature. *AT&T Comments on the CGE&Y Draft Final Report at 33.*

The Arizona record does not have a CGE&Y finding on the adequacy of the Qwest CMP to meet FCC requirements; and the CMP DFR does not help answer the

fundamental questions. The ROC results that illuminate the process deficiencies and the breakdowns in Qwest's use of the process are more clearly stated evidence that shows the weaknesses.

It does not appear reasonable to AT&T that the Arizona Commission could find that Qwest's OSS is nondiscriminatory and provides competitive local exchange carriers ("CLECs") a meaningful opportunity to compete while ROC has open Observations and Exceptions on Qwest's CMP.

III. Part H. The significant CMP Product/Process issues need to be resolved in order for Qwest to rely on its SGAT as support for its section 271 application. References to Qwest PCATs and Technical Publications in the SGAT cannot change the existing SGATs and interconnection agreements. However, to the extent that Qwest wishes to change the terms of the SGAT by its PCATs or Technical Publications, there must be an effective, balanced industry process that controls the changes to those product documents. CMP Product/Process is currently a "notice and go" process. Qwest tells CLECs that Qwest is changing something and then Qwest implements the change. There is only discussion after the fact. This process must be more collaborative. CLECs should have input into changes before they are implemented. *See also* CMP Gap Analysis ## 20 – 22 & 114.

IV. Part J. Qwest must demonstrate compliance and adherence with the redesigned CMP over time. This has not been demonstrated in Arizona. AT&T is not certain how this will be satisfactorily demonstrated in Arizona, because it appears that this is not part of CGE&Y's review. Of particular concern is the FCC requirement that

the CMP be used to implement “at least one significant software release.”⁴ Qwest has not shown that it follows its CMP to implement a software release of the pre-ordering, ordering, repair & maintenance or billing interfaces.

V. Additional Significant Issues. Following are additional issues of significance that must be closed prior to a determination that Qwest’s CMP complies with the FCC’s requirements.

- a. Discussion and documentation of the process for Industry Guideline changes must be completed. (CMP Issues Log # 94.)
- b. Defined Terms used in the Redlined Draft CMP Document must be concluded. (CMP Issues Log ## 106, 133, 141, 162, 182 & 248.)
- c. What changes are CLEC-impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected? (CMP Issues Log ## 110 & 179.)
- d. What is CMP’s role in rate changes or rate “validation”? (CMP Gap Analysis ## 1 & 2.)
- e. What process will be used to make changes to CMP once it has been “re-designed”? By what method does Qwest propose to prove that it has actually implemented changes as it represents it has done/is doing/will do? (CMP Gap Analysis # 103. *Also* CMP Gap Analysis # 116.)
- f. SGAT Section 12.2.6. (CMP Gap Analysis ## 148 & 149.)

VI. Conclusion. AT&T must reiterate its concerns regarding the provision of any list that selectively identifies issues raised in AT&T’s February CMP Comments that must be resolved by Qwest before a finding of section 271 compliance can be made. It is AT&T’s position that Qwest must address all the issues raised by AT&T in AT&T’s February CMP Comments. However, AT&T recognizes that the Staff intends to make a recommendation before all the issues are resolved. Because of this, AT&T has identified

⁴ Letter dated September 27, 1999, from Mr. Lawrence E. Strickling, Chief, Common Carrier Bureau, to Ms. Nancy E. Lubamersky, U.S. WEST.

herein the issues that, at a minimum, should be addressed before any recommendation by Staff is made. Staff should also recognize that, collectively, the sheer volume of unresolved issues prevent any finding of compliance with section 271.

Respectfully submitted this 5th day of March 2002.

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