

BEFORE THE ARIZONA CORPORATION COMMISSION

**WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER**

**IN THE MATTER OF THE)
INVESTIGATION INTO)
US WEST COMMUNICATION,) DOCKET NO. T-00000A-97-0238
INC.'S COMPLIANCE WITH)
THE § 271 OF THE)
TELECOMMUNICATIONS ACT)
OF 1996)**

**COVAD COMMUNICATIONS COMPANY'S COMMENTS ON AT&T'S LIST
OF PRIORITY CMP ISSUES**

Covad Communications Company ("Covad") respectfully submits these Comments on AT&T's List of Priority CMP Issues (the "AT&T List").

Covad concurs in the list of issues identified by AT&T as requiring resolution before Qwest's change management process may be found compliant with Section 271 of the Telecommunications Act of 1996. Covad believes, however, that there is a need for clarification as to the scope of one issue on the AT&T List, and for the addition of one item thereto.

Clarification of Scope of Issue. In its List, AT&T identified the issue of "[w]hat changes are CLEC impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected?" AT&T List, p. 7, subpoint (c).

Covad agrees that this is an issue requiring resolution before Section 271 relief may be given, but clarifies that it believes this issue must be addressed in terms of (1) product, process and systems changes that are CLEC-impacting, and (2) retail changes that may be CLEC-impacting.

Additional Issue. In addition to the issues identified by AT&T, Covad believes that an exception process must be agreed upon and included in the parties' Master Redlined CLEC-Qwest CMP Redesign Framework Interim Draft (*i.e.*, the "CMP contract"). Currently, while the parties have agreed in principle on the method and use of an exception process in connection with the CMP, that agreement is not reflected in the master redlined document. Accordingly, while this remains an issue to be resolved, Covad believes it is non-controversial and can be quickly and easily accomplished by the parties.

Dated this 8th day of March, 2002.

Respectfully submitted,

COVAD COMMUNICATIONS COMPANY

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