

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of the
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST
Communications, Inc.'s Statement of
Generally Available Terms Pursuant to
Section 252(f) of the Telecommunications
Act of 1996

Docket No. UT-003040

**AT&T'S UPDATE REGARDING O & Es FOR CMP
AND REMARKS REGARDING PO-16 CONCERNING CMP**

AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services on behalf of TCG Seattle and TCG Oregon (collectively "AT&T") hereby submit this Update Regarding O & Es for the Change Management Process ("CMP") and AT&T provides its Remarks Regarding PO-16 Concerning CMP.

As a preliminary matter, it is important to bare in mind that the third party Exceptions regarding CMP, unlike other ROC Exceptions, when prematurely closed at Qwest's request means that there is absolutely no observation of any compliance whatsoever. Unlike the other ROC Exceptions and Observations, this is not a "re-test" scenario wherein Qwest accomplished some portion of the required task, this is a complete lack of evidence with problems identified and not fixed.

With respect to CMP, there are three Exceptions that KPMG closed as either "unresolved" or "inconclusive," namely Exceptions 3094, 3110 and 3111. At Qwest's

request, Exceptions 3094 and 3110 are now undergoing limited re-testing as is evidenced by Exception Response for Exception 3094 (including Appendix D). Likewise, as stated in Qwest's Supplemental Response to Exception 3110 issued by Qwest on April 25, 2002, Qwest has requested limited re-testing because "Qwest believes KPMG Consulting is now in a position to observe adherence to the documentation release intervals with the conclusion of the comment and response period ending on May 3, 2002. Qwest requests that KPMG Consulting review the documents issued through May 3, 2002 and reconsider the disposition."¹ In addition, AT&T submits as Exhibit A, Qwest's latest response to Exception 3110. Here, KPMG alters the status of Exception 3110 from "closed, inconclusive" to "open." The Commission should hold any decisions regarding CMP in abeyance until it hears from KPMG on the results of its retesting.

Exception 3111 remains closed "inconclusive." Here, KPMG noted that it could not determine Qwest's adherence to the prioritization and packaging process of CMP. Other than a "did too" response, which was reported on in AT&T's late filed Exhibit 1618, Qwest has provided nothing new.²

In addition to the Exceptions, AT&T also offers the latest information available on Performance Measure PO-16. See **Exhibit B**, attached hereto. This measure reports on the number of OSS release notifications Qwest sends within specified intervals determined in CMP. While Liberty Consulting apparently performed an audit on PO-16, such audit was premature and inappropriate for the reasons noted in brackets contained in the attached PO-16 Audit Report.

¹ See attached **Exhibit A**.

² Without repeating it here, AT&T incorporates by reference its discussion regarding the Observations and Exceptions related to SATE and previously filed in WA Hearing Exhibit 1618.

In short, AT&T holds firm in the belief that it is premature to judge Qwest's conduct as compliant with CMP until such time as KPMG and Liberty have sufficiently observed actual, present compliance.

Respectfully submitted this 20th day of May, 2002.

**AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC.,
TCG SEATTLE AND TCG OREGON**

Mary B. Tribby
Letty S.D. Friesen
1875 Lawrence Street, Suite 1575
Denver, Colorado 80202
Telephone: (303) 298-6475