BEFORE THE ARIZONA CORPORATION COMMISSION

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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** **QWEST'S RESPONSE TO HP's SATE RECOMMENDATIONS**

Qwest Corporation ("Qwest") respectfully submits its responses to Hewlett-Packard's ("HP") SATE[1] recommendations as provided in HP's SATE Summary Evaluation Report for Qwest IMA-EDI SATE, version 2.0, dated December 3, 2001.

I. INTRODUCTION

HP's evaluation of Qwest's SATE concludes that it "is adequate to support Qwest CLEC testing in the State of Arizona, given current levels of CLEC usage".[2]

HP's SATE Summary Evaluation Report detailed nine recommendations for Qwest to consider. HP proposes these recommendations as a method "to ensure SATE's adequacy continues to support CLEC testing".[3]

Qwest fully plans to continue managing and enhancing SATE to support CLEC testing. This is demonstrated by Qwest responses to HP-generated issues during the SATE

[1] SATE is the acronym for Qwest's Stand-Alone Test Environment.
[2] SATE Summary Evaluation Report for Qwest IMA-EDI SATE, external draft, v2.0, (Dec. 3, 2001), section 7.4
[3] SATE Summary Evaluation Report for Qwest IMA-EDI SATE, external draft, v2.0, (Dec. 3, 2001), section 7.4

evaluation; Qwest support of the six CLECs who have utilized/are utilizing SATE to date; ongoing Qwest enhancements such as flow-through and automated post-order processing; and the continuing SATE User Group forum as part of the Qwest Change Management Process (CMP). Notwithstanding these efforts, Qwest submits the following responses to HP's recommendations that further demonstrate ongoing commitment on the part of Qwest to SATE and its ability to support CLEC testing.

II. HP's SATE RECOMMENDATIONS[4] AND QWEST RESPONSES.

A. Recommendation 1: HP recommends that Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.

Qwest currently has forums and processes in place to address this recommendation. As a starting point, SATE was implemented supporting all products and associated transactions for which CLECs are currently certified to use in Qwest IMA EDI.[5]

To address CLEC's future needs, Qwest implemented a process by which CLECs can request the addition of products to SATE. This process states "…additional functionality can be agreed upon and added in later releases. Requests for transactions not currently supported may be requested via CMP".[6] Currently, two CMP CRs are open based on CLEC product requests: Line Splitting and Loop Splitting. Based on the process described above, Qwest will utilize the CMP CR prioritization process to add the new products to SATE.

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[4] SATE Summary Evaluation Report for Qwest IMA-EDI SATE, external draft, v2.0, (Dec. 3, 2001), section 7.4

[5] The list of products can be found in the EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - http://www.uswest.com/wholesale/ima/edi/document.html

[6] EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - http://www.uswest.com/wholesale/ima/edi/document.html

In addition to the CLEC process, Qwest continues to monitor the products that CLECs express interest in and has proactively added products or created CMP CRs to add products to SATE. Qwest agreed to add Unbundled Distribution Loop and Unbundled Distribution Loop with Number Portability as the products to be added to SATE for HP's new product evaluation, as Qwest anticipated future EDI implementations of these products. Also, Facility Based Directory Listings will be added as an IMA product with the 9.0 release. As a result, Qwest is creating a CR to add Facility Based Directory Listings to SATE.

Qwest believes that its published process meets the needs of the CLEC community and through CLEC input Qwest is committed to continue meeting CLECs' needs.

B. Recommendation 2: HP recommends that Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation.

Qwest follows documentation quality and versioning control processes for all externally published documentation, including SATE. During HP's SATE evaluation, Qwest chose to go outside the standard documentation-publishing schedule and processes in an effort to be responsive to HP's issues. Qwest believes this observation is a result of HP's evaluation requests and not indicative of Qwest's standard processes.

However, Qwest will externally publish the guidelines that detail the release management, version control, and quality assurance processes that Qwest employs for the issuance of SATE documents. These guidelines will be published in the SATE Data Document by January 15, 2002, which will be available on the Qwest Wholesale web site at URL: http://www.uswest.com/wholesale/ima/edi/document.html.

Qwest current documentation processes support the production of documents that enable CLECs to properly utilize SATE.

C. Recommendation 3: To ensure continued adequacy of the SATE, HP recommends:

- **That Qwest clearly and specifically identify the roles and responsibilities of each individual and organization involved in the SATE. This definition of roles and responsibilities should include goals and objectives and mission statements for each organization and for all personnel. In addition, the job description for each employee should be clearly defined**
- **That Qwest develop a system of internal controls to ensure accountability for organizations and individuals involved in the SATE process. These controls should use clearly defined goals and objectives and should tie specifically to functional responsibility, such as quality of documentation, accuracy of test account data, mirror image of production, etc. Employees involved in the SATE should be encouraged to accomplish these goals and objectives**
- **That Qwest develop process flow documentation that accurately reflects actual SATE processes and is a reliable guide to CLECs using the SATE**

In response to the first two bullet points of this recommendation, Qwest is developing a staffing plan which details Qwest's CLEC testing organizational structure and the roles and responsibilities of all resources that directly support the organization. Additionally, this documentation will include objectives of the organization and the processes in place to ensure accountability. This plan will be maintained as part of Qwest's IMA EDI Implementation Guidelines,[7] and will be published with version 9.0 of the guide, scheduled for release on January 21, 2002.

For the third bullet point of this recommendation, Qwest is developing the process flow documentation as recommended by HP. This information will be maintained as part of Qwest's

[7] EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - http://www.uswest.com/wholesale/ima/edi/document.html

IMA EDI Implementation Guidelines document[8], and will be published with version 9.0 of the guide, scheduled for release on January 21, 2002.

These documentation process measures will ensure the continued sufficiency of SATE in meeting the stated goals of the test environment.

D. Recommendation 4: HP recommends that Qwest publish a list of variances between SATE and production business edits to ensure that CLECs are fully aware of any such discrepancies so that a CLEC may effectively develop their business processes in this 'simulated' environment. This list should become a permanent part of the SATE documentation library.

Qwest believes this recommendation is specific to the Errors List process for SATE. The Qwest IMA EDI Errors List contains all errors generated by the IMA system. The Business Processing Layer (BPL) used by SATE is the same as the BPL used by IMA. Thus, the IMA Errors List for SATE is the same as the IMA Errors List for IMA. However, this list does not contain errors generated by Qwest's legacy systems. When an error message is produced by a legacy system, the IMA BPL simply passes the error message to the CLEC, which requires no processing to be performed by IMA. SATE includes all errors possibly generated by IMA, as well as commonly triggered legacy system errors.

As only the common legacy system errors are found in SATE, Qwest will create a list of all legacy system error messages coded into SATE. This will allow a CLEC to understand which error messages are available through SATE. A note will be included on this document to explain that additional legacy system errors can be coded into SATE if requested. This request can be made using the data request process.

[8] EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - http://www.uswest.com/wholesale/ima/edi/document.html

Additionally, Qwest will provide a list of errors from those legacy systems whose errors were returned through Qwest's 8.0 production EDI interface during a 6-month period. Qwest will compare this list to the errors currently contained in SATE and will publish that list and discuss it in the CMP forum. Before putting a process in place to maintain this list ongoing, Qwest will gain input from CLECs through the CMP process and jointly assess the value of maintaining this list ongoing. Based on that joint assessment, a decision will be made on whether to implement an ongoing process.

Since the IMA EDI Errors list is generated from a system query, errors from sections of code that are no longer executable are included in the list. Beginning with IMA EDI release 9.1, Qwest will ensure that these error messages are removed from the code. As a result, these non-executable errors will no longer appear on the IMA EDI Errors list.

With IMA EDI release 9.0, the IMA EDI Errors List will be generated twice per IMA EDI release. The first generation will be coincident with the availability of the new release in SATE, which will occur on January 27, 2002. The second generation will be distributed when the release deploys in production on February 25, 2002. These documents will be published to the CLEC community through the Qwest Release Notification process.

E. Recommendation 5: HP recommends that Qwest formally incorporate the SATE into the CMP process, and future changes and modifications should be subject to that process and that Qwest develop a permanent, formalized method of obtaining CLEC input and identifying current and future SATE requirements in connection with the CMP process. This process should proactively seek CLEC evaluation of the SATE process, suggestions for improvement, and forecasts for testing requirements. HP also recommends that Qwest obtain input from the CLECS to determine the full suite of products that shall be included in the SATE.

SATE is formally incorporated into the CMP process. Qwest began the CLEC SATE Users Group in early November 2001, as part of the CMP process. Its Mission Statement best

defines the purpose of the Users Group[9]:

1. Give Qwest the opportunity to communicate current plans for it's testing environments.
2. Give the CLECs the opportunity to communicate their current and future testing needs.
3. Jointly present a list of CRs to CMP to ensure that future enhancements of Qwest environments meet those stated CLECs' needs.

This user group has met five times thus far, beginning with the November 6, 2001, kickoff meeting. Meetings for January, February, and March have been scheduled.

The SATE Users Group is part of the overall CMP process where inputs and recommendations are taken and incorporated into the CMP processes. To date, Qwest has recorded six SATE Change Requests (CRs) based on CLEC requirements. These CRs will be taken to the CMP forum for prioritization in the January 17, 2002, CMP meeting. SATE CRs will be managed by CMP just as IMA CRs are managed today. [10]

To further incorporate SATE into CMP, Qwest will ensure that the monthly CMP agenda includes a standing entry for SATE discussion. This agenda entry will include discussions on the status of SATE enhancements, SATE CRs, and CLEC feedback. This agenda addition will begin with the January 17, 2002, CMP meeting.

The proactive incorporation of SATE into the CMP process is consistent with the support of IMA, which will ensure that SATE remains adequate to meet the needs of Arizona CLECs and their future testing requirements.

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[9] SATE Users' Group Meeting Minutes, November 13, 2001.

[10] SATE CRs will be managed by the same process as IMA CRs, but will be prioritized separately from the other OSS CRs – SATE Users' Group Meeting Minutes, December 4, 2001.

F. Recommendation 6: HP recommends that Qwest develop a formal process by which the SATE will be available for new release testing on an ongoing basis.

Qwest has a formal process by which the SATE will be available for new release testing on an ongoing basis. This process states "Beginning with release 9.0, new releases of IMA are planned for release on the IMA EDI Stand-Alone Test Environment approximately thirty calendar days prior to their release in production unless that release is deemed to be in 'red testing status'. Red Testing Status indicates that the IMA release's system testing effort has discovered significant issues that place the release in jeopardy".[11]

Based on the process stated above, IMA EDI Release 9.0 will be implemented in SATE on January 27, 2002, and in production on February 25, 2002. Qwest also notes that on October 22, 2001, IMA EDI Release 8.01 was released in SATE 27 days prior to the associated IMA production release. With the deployment of a new release into SATE approximately 30 days prior to production, Qwest has demonstrated that it has an existing formal process by which SATE is available to CLECs for new release testing on an ongoing basis[12]

G. **Recommendation 7: To ensure that the SATE is adequate for full release testing, HP recommends that 9.0 be tested. This release is expected to take place February 2002.**

Qwest does not believe that an additional 3rd party evaluation of SATE 9.0 is necessary to determine that SATE is adequate for full release testing. HP has already conducted the full breadth of regression and progression testing for the entire suite of products in SATE 7.0 and

[11] EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - http://www.uswest.com/wholesale/ima/edi/document.html

[12] IMA EDI Implementation Guide, page 25.

8.0. Furthermore, HP has evaluated a significant point release, 8.01. Therefore, a complete test of 9.0 by HP is not necessary. However, in order to address HP's recommendation, Qwest is willing to file performance information that demonstrates an adequate implementation of 9.0 in the SATE.

Specifically, in order to calculate the recently developed SATE Accuracy PID each month, Qwest exercises every transaction available in SATE. Accordingly, upon the availability of SATE release 9.0, Qwest will execute all of the SATE transactions, capturing the output to perform the PID calculations. Qwest suggests that it submit the inputs (list of transactions submitted), outputs (results from EDI), results, and conclusions from this exercise to the ACC for review. These results should assure the ACC that the successful regression and progression testing experienced by HP during its evaluation have carried forward to release 9.0 and will continue into the future.

Qwest will perform this exercise over a five-day period after the implementation of SATE Release 9.0 on January 27, 2002. Subsequently, Qwest will collate the necessary resulting data and file with the ACC on February 1, 2002.

H. Recommendation 8: HP recommends that a SATE performance standard be developed for Arizona that addresses the need for Qwest to demonstrate that the SATE remains an adequate mirror image of production as OSS systems evolve. In reviewing this standard, the ACC may wish to consider the nature and volume of transactions that are executed in production.

Qwest has already proposed a measurement that is being discussed by the Arizona TAG. The agreement of the parties, once reached, should be used to satisfy this recommendation.

Qwest has developed a SATE performance measure, PO-19 – Stand-Alone Test Environment (SATE) Accuracy[13]. The language of this measure has been agreed and its purpose is to "evaluate Qwest's ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the SATE environment".[14]

The AZ SATE PID was developed through consensus with the CLEC's. However, the standard for this measure has not yet been agreed. Discussions are ongoing with the Arizona TAG. Regardless, Qwest will begin reporting on this measure with November 2001 results in the December 2001 reports.

I. Recommendation 9: HP recommends that Qwest file with the ACC an implementation plan for the above recommendations, which includes specific deliverables, milestones, and dates, no later than December 31, 2001.

Qwest respectfully submits this document as the response to this recommendation for filing an implementation plan as presented by HP. As the above responses to the recommendations indicate, Qwest has addressed many of the recommendations already and is committed to ensuring that the remaining recommendations are fully implemented by the end of February 2002.

III. CONCLUSION

In conclusion, Qwest has demonstrated that SATE provides adequate support for CLEC testing and that it continues to be enhanced based on CLEC requests. Additionally, Qwest has shown further commitment by these responses to HP's additional recommendations. The Commission should be confident that Qwest's current SATE functionality, documentation, and processes, as well as its ongoing plans to continue to enhance and support SATE, demonstrate

[13] Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.
[14] Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

Qwest's continual commitment to providing adequate testing opportunities to the CLEC community.