

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation Into)
U S WEST Communications, Inc.'s) Docket No. UT-003022
Compliance With Section 271 of the)
Telecommunications Act of 1996)
_____)

In the Matter of U S WEST Communications,) Docket No. UT-003040
Inc.'s Statement of Generally Available)
Terms Pursuant to Section 252(f) of the)
Telecommunications Act of 1996)
_____)

AT&T'S COMMENTS ON QWEST'S PROPOSED PO-20 MEASUREMENT

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 Response in Opposition to Qwest Corporation's ("Qwest") Request for Acceptance of PO-20. AT&T opposes adoption of PO-20 for the following reasons:

I. The PO-20 PID Should Be Developed Through a Collaborative Process.

As an initial matter, AT&T objects to Qwest's unilateral PID development and its rush to receive the Commission's approval. A process similar to the collaborative process that resulted in the development of every other PID should be employed. That process worked and demonstrated that it could produce prompt resolution to PID development issues. A collaborative process would also reduce the possibility that there could be multiple, state-specific versions of a PO-20 PID for both the CLECs and Qwest to contend with. The best approach is to use the relationships between Qwest, the CLECs and the regulators that already exist to create a mutually acceptable measure of Qwest's ability to manually create service orders.

While AT&T believes the collaborative approach is the best approach for PID development, the remainder of these comments will identify some of AT&T's specific concerns with what is and is not part of Qwest's PO-20 proposal. In addition, attached to these comments, as **Exhibit A**, are AT&T's redlined revisions to and questions about Qwest's proposed PO-20 PID.

II. The LSR Should Be Compared to the Post-Provisioning LSR

A significant flaw is evident in Qwest's PO-20 proposal. Qwest's proposed PO-20 measurement limits the scope of its comparison of order entries to those present on the LSR and the resulting service order(s). This structural limitation deprives CLECs from necessary and appropriate insight into the data that form the basis for the metric. The post-provisioning Customer Service Record would be a more appropriate comparison to the LSR that is issued. In this way, a CLEC could, if desired, comprehend the results of PO-20 calculations that would not be possible if the PO-20 analysis is limited to a comparison between the LSR and the resultant service orders: CLECs have no access to Qwest-generated service orders. A comparison between the LSR and the post-provisioning CSR also permits a determination to be made that what was ordered was actually installed. Qwest's proposal compares what was ordered to what should be installed.

III. The Scope of Products and Services Proposed by Qwest is Too Limited.

Qwest's proposal only includes product reporting for combined reporting of UNE-P POTS and Resale and combined reporting of analog unbundled loops and two-wire non-loaded unbundled loops. The scope of the measurement should be expanded to include all of the products and services that Qwest provides to CLECs.

IV. The Scope of Service Order Fields to Be Examined is Too Limited.

Qwest's proposed PO-20 measurement limits the scope of the service order examination to the CLEC ID, date and time the CLEC sent the LSR, CLEC purchase order number, customer name and address information, the billing account number and the due date provided on the FOC. Qwest's proposal ignores many important service order fields. The ROC OSS test identified numerous examples of Qwest inappropriately assigning the application date for an order. Despite the known history of human errors associated with the assignment of the application date, Qwest's proposal fails to include the application date field within the scope of PO-20. Qwest's proposal also utterly fails to examine any of the services and features that were ordered on the LSR. Ensuring that the services and features ordered by the CLEC and contained in the LSR get entered into the associated service order(s) should be one of the primary purposes of any service order accuracy measurement. An appropriate service order accuracy measurement should compare the USOCs and PIDs that were contained on the LSR to the USOCs and PIDs that were actually installed by Qwest.

V. Qwest's Methods and Procedures For Collecting PO-20 Data Need to be Better Understood.

Apart from some of the key elements of an appropriate service order accuracy measurement that are missing from Qwest's proposal, there are also parts of Qwest's proposal that beg for further clarification. For example, there needs to be a better understanding of when a service order is or is not "accurate." In addition, there needs to be a better understanding of how Qwest "randomly" selects service orders from throughout its region.

Respectfully submitted this 22nd day of August 2002.

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

By: _____

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