

HOGAN & HARTSON

L.L.P.

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910
WWW.HHLAW.COM

August 8, 2002

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St, S.W., TW-B204
Washington, D.C. 20554

**Re: Application of Qwest Communications International Inc.
To Provide In-region InterLATA Services in the States of
Colorado, Idaho, Iowa, Nebraska and North Dakota,
Docket No. 02-148**

**Application of Qwest Communications International Inc.
To Provide In-region InterLATA Services in the States of
Montana, Utah, Washington and Wyoming,
Docket No. 02-189**

Dear Ms. Dortch:

Yesterday, Qwest Communications International Inc. ("Qwest") provided information in writing on Qwest's pre-order/order integration capabilities to Jon Minkoff of the Wireline Competition Bureau ("WCB"). This information was provided pursuant to a discussion held on August 2, 2002, between Mr. Minkoff, Ian Dillner and William Dever, all of the WCB, and Andrew Crain, Yaron Dori and Sumeet Seam, all representing Qwest. The information provided to Mr. Minkoff appears below.

Qwest's Offering of Pre-Order/Order Integration

In order to obtain Section 271 relief, the FCC requires that a BOC demonstrate that CLECs are capable of integrating pre-order and order data using

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the BOC's interfaces. ¹ In the *New York 271 Order* ² and the *Texas 271 Order*, ³ the FCC established standards through which a BOC can demonstrate that it meets this requirement.

In its OSS Declaration and Reply Declaration, Qwest provided the FCC with evidence that it meets the standards governing pre-order/order integration under the *New York 271 Order* and the *Texas 271 Order*. ⁴ Qwest here compares that evidence to the standard set forth in the *New York 271 Order* to demonstrate its compliance with that *Order's* requirements.

In its *New York 271 Order*, the FCC based its finding of Bell Atlantic's compliance on two factors: (1) evidence that one CLEC, CTC Communications, developed an integrated interface and that two other CLECs, AT&T and WorldCom, "integrated parsed CSR retrieval and limited address validation functionality into their back office systems;" ⁵ and (2) KPMG's findings that CLECs are capable of integrating pre-ordering information into their back office systems. ⁶ Notwithstanding its reliance on KPMG's finding, the FCC noted in its *New York 271 Order* that "KPMG did not build a back office system to automatically populate the pre-ordering data into the ordering interface." ⁷

As explained more fully below, Qwest has already provided the FCC with evidence that is just as compelling – if not more compelling – than the evidence the FCC relied on in its *New York 271 Order*. Specifically, as demonstrated below,

¹ See *Georgia/Louisiana 271 Order* at App. D, ¶ 33.

² See *New York 271 Order* at ¶¶ 137-139.

³ See *Texas 271 Order* at ¶¶ 152-161.

⁴ See generally OSS Reply Decl. at 137-143; OSS Decl. at ¶¶ 195-200.

⁵ See *New York 271 Order* at ¶ 138.

⁶ See *id.* at ¶ 138.

⁷ See *id.*

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(1) CLECs and service providers have successfully developed interfaces that integrate Qwest pre-order and order data; (2) Qwest provides CLECs with parsed CSR and address validation data that permit them to integrate pre-order/order information into their back office systems; (3) during the ROC OSS Test, HP found that CLECs can successfully integrate pre-ordering data into their ordering LSRs; and (4) during the ROC OSS Test, HP developed and actually used an EDI interface that integrated pre-order/order data.⁸

1. CLECs and Service Providers Have Successfully Developed Interfaces that Integrate Pre-order/Order Data

Qwest has provided the FCC with “evidence of successful commercial integration”⁹ through affirmations by New Access (a CLEC) and two EDI service providers, Telcordia and Nightfire.¹⁰ Despite AT&T’s claims that affirmations by EDI service providers are immaterial,¹¹ this evidence is as meaningful as CLEC testimonials because actual CLECs use the integration capability developed by Telcordia and Nightfire to populate orders with pre-order information. For example, Telcordia verified in its letter that, as of January 28, 2002, it provides four CLECs “with a single integrated interface that they can use for both Local Service Pre-Orders and Orders (including the ability to populate Pre-Order response information onto Order Forms).”¹²

⁸ See *id.*

⁹ See *id.*

¹⁰ See OSS Reply Decl. at ¶ 137; Reply Exhibit LN-15 (Letter to Jeff Thompson, New Access, from David Lueck, New Access, dated June 19, 2002); OSS Decl. at ¶ 200, n.263; Exhibit LN-OSS-12 (Letter to Jeff Thompson, Qwest, from Richard Jocawleff, Telcordia, dated January 28, 2002); Exhibit LN-OSS-13 (Letter to Jeff Thompson, Qwest, from Venkates Swaminathan, Nightfire, dated May 22, 2002); see also Qwest July 25 Ex Parte on Pre-order/Order Integration.

¹¹ See AT&T Comments at 39, Finnegan/Connolly/Menezes Decl. at ¶ 122.

¹² See Exhibit LN-OSS-12 (Letter to Jeff Thompson, Qwest, from Richard Jocawleff, Telcordia, dated January 28, 2002).

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More recently, Nightfire stated that it had successfully tested in Qwest's Stand Alone Test Environment "on behalf of at least [five CLECs]" through EDI "interfaces [that] connect Qwest to its CLEC trading partners and allow CLECs to have fully automated interfaces requiring little to no manual intervention."¹³ Nightfire has separately stated that it "and its customers have been successful in testing the integration for the following transactions from pre-order query to population of an LSR: Address Validation Inquiry, Customer Service Inquiry."¹⁴

As Qwest has demonstrated, 31 CLECs have built interfaces to Qwest's EDI interfaces.¹⁵ Based on the testimonials provided by New Access, Telcordia and Nightfire, each of these CLECs therefore are *capable* of integrating pre-order/order data.¹⁶

At the state level, state commissions such as the Colorado PUC have conducted workshops and hearings on OSS issues that included discussions of pre-order/order integration. CLECs had the opportunity to file comments on the subject and identify any specific issues before the Colorado PUC and other state commissions. If CLECs had any difficulty in developing integrated interfaces, they had the opportunity and obligation to raise such issues at those times. They did not. Vague claims raised at this late date – in the face of uncontroverted commercial evidence that CLECs are in fact today integrating pre-order/order data – therefore should be disregarded.

¹³ See OSS Reply Decl. at ¶ 137, Reply Exhibit LN-14 (Letter to Jeff Thompson, Qwest, from Venkates Swaminathan, Nightfire, dated June 27, 2002).

¹⁴ See Exhibit LN-OSS-13 (Letter to Jeff Thompson, Qwest, from Venkates Swaminathan, Nightfire, dated May 22, 2002).

¹⁵ See Qwest July 19 Ex Parte on wholesale service performance, wholesale service delivery, SATE and billing.

¹⁶ See *New York 271 Order* at ¶ 137; *Texas 271 Order* at ¶ 152 ("[A] BOC with integrated pre-ordering and ordering functions for its retail operations must provide competing carriers with access to the same *capability*") (emphasis added).

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2. Qwest Provides CLECs with Parsed CSR Data That Permit Them To Integrate Pre-order/Order Information into Their Back Office Systems

New Access and HP ¹⁷ have developed integrated IMA-EDI interfaces using Qwest parsed CSR and Address Validation data. ¹⁸ Additionally, Qwest makes available its EDI Developer Worksheets to all CLECs to enable them to easily identify the parsed data elements that Qwest returns for pre-order transactions, including CSR and Address Validations. ¹⁹ This evidence demonstrates that Qwest provides CLECs with parsing data in accordance with the *New York 271 Order*.

In the *New York 271 Order*, the FCC based its findings of Bell Atlantic's compliance in part on evidence that AT&T and Worldcom "integrated parsed CSR retrieval and limited address validation functionality into their back office systems." ²⁰ Qwest's offering of confirmations from New Access and HP that they each have integrated using parsed data provided by Qwest is just as probative. HP is not an actual CLEC. But, its achievement of successful parsing is as meaningful as that of an actual CLEC because HP, like CLECs, achieved integration first-hand through constructing its own EDI interface. ²¹ The salient point is that HP was able to construct an integratable interface.

¹⁷ See Section 3 below.

¹⁸ See Attachment 1 (E-mail correspondence between Kim Jeffries, Qwest, and David Lueck, New Access, dated August 2, 2002); Exhibit LN-OSS-9 (Pre-order to Order Integration Field Report – IMA-EDI Release 7.0) at 38-39.

¹⁹ See Exhibit LN-OSS-5 (Appendix A -- Developer Worksheets – Pre-order).

²⁰ See *New York 271 Order* at ¶ 138.

²¹ See Section 4 below.

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3. During the ROC OSS Test, HP Found that CLECs Can Successfully Integrate Pre-ordering Data Into Their Ordering LSRs

During the ROC OSS Test, HP successfully developed and used an EDI interface that integrated pre-order/order data.²² HP developed this functionality through the development, testing and implementation of EDI 7.0 (adhering to LSOG 3).²³ HP also performed an evaluation of EDI 8.0 (where LSOG 5 guidelines were introduced). In a separate test, HP also was able to confirm that Qwest provides CLECs with the tools they need to successfully develop an EDI interface that can integrate pre-order/order data.²⁴

AT&T and WorldCom try to nit pick HP's report in an attempt to show that integrating pre-order/order data using Qwest's systems can be difficult.²⁵ But HP's findings show that Qwest allows CLECs to accomplish successful pre-order to order integration by providing CLECs with ample parsed data.²⁶ Qwest also has submitted evidence in this proceeding of the parsing documentation that it offers to CLECs.²⁷ Qwest does not dispute that, like most telecommunications endeavors, constructing a functioning, certifiable EDI interface requires experience and skill.

²² See OSS Decl. at ¶ 198.

²³ *Id.*

²⁴ See *id.* at ¶ 199, Exhibit LN-OSS-11 (Pre-Order to Order Integration Report, Version 5.0, April 15, 2002). On July 31, 2002, HP filed a revised version of this report (Version 6.0), which corrected a typographical error. See HP July 31 Ex Parte in WC Docket No. 02-148.

²⁵ AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶ 123; WorldCom Comments at 8.

²⁶ See Exhibit LN-OSS-11 (HP Pre-order to Order Integration Report, Version 5.0, April 15, 2002) at 10.

²⁷ See Qwest July 25 Ex Parte on Pre-order to Order Integration; OSS Reply Decl. at ¶ 143; Exhibit LN-OSS-5 (Appendix A – Developer Worksheets – Pre-order).

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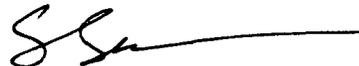
Nevertheless, HP found that a CLEC with such attributes “can build a CSR to LSR parsing interface.”²⁸

4. During the ROC OSS Test, HP Developed and Used an EDI Interface that Integrated Pre-order/Order Data

In the *New York 271 Order*, the FCC relied on KPMG’s conclusion that Bell Atlantic provided CLECs with pre-order/order integration capability even though KPMG did not actually build an integrated EDI interface.²⁹ In the ROC OSS Test, HP performed the very same evaluation that KPMG used to reach its conclusions in New York, but HP, in fact, built its own integrated EDI interface and successfully integrated pre-ordering and ordering activities to submit LSRs through this interface.³⁰ Therefore, HP’s first-hand achievement of successful integration is more probative than KPMG’s findings in New York and should be accorded greater weight here.

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions.

Respectfully submitted,



Sumeet Seam

cc: J. Minkoff
I. Dillner
W. Dever
M. Carowitz

²⁸ See Pre-Order to Order Integration Report, Version 6.0, July 31, 2002, at 34.

²⁹ See *New York 271 Order* at ¶ 138.

³⁰ See Attachment 5, Appendix P, Colorado OSS Hearing, June 10, 2002, at 89-97.

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E. Yockus

G. Remondino

R. Harsch

J. Jewel

P. Baker

C. Post

P. Fahn

B. Smith

J. Prisbey

J. Myles

S. Vick

J. Orchard

S. Oxley

A. Crain

Y. Dori

ATTACHMENT 1

E-mail Correspondence Between Kim Jeffries, Qwest, and David Lueck, New Access, dated August 2, 2002

----- Original Message -----

From: "David Lueck" <dlueck@newaccess.cc>
Subject: RE: Pre-Order/Order Integration follow up
To: "Kim Jeffries" <kxjeffr@qwest.com>

-----Original Message-----

From: Kim Jeffries [mailto:kxjeffr@qwest.com]
Sent: Friday, August 02, 2002 11:34 AM
To: David Lueck
Cc: Carol McKenzie
Subject: Pre-Order/Order Integration follow up

Hi David,

Thanks very much for the letter you provided Qwest regarding the success New Access has had in IMA EDI pre-order/order integration.

As we have discussed on the phone, a filing was made at the FCC which raised additional questions about the information you originally provided, and I was hoping you could provide us a bit more detail to help "fill in the blanks."

Here are the questions we need your assistance with:

Q: Who developed New Access' pre-order/order integration capability?

A: [David Lueck] New Access Communication LLC Information Services Department Software Programmer Dave Lueck

Q: When did New Access begin to autopopulate LSRs in production?

A: [David Lueck] June 1, 2002

Q: To what extent does New Access autopopulate LSRs with pre-order information?

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A: [David Lueck] NA uses all relevant fields from the AVR and CSRR (response transactions) to pre-populate the order, and that remaining fields are populated based on End User preferences.

Thanks for your help, David!

Regards,
Kim