

**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

**QWEST CORPORATION'S REPORT ON
THE STATUS OF CHANGE MANAGEMENT
PROCESS REDESIGN**

Qwest Corporation hereby provides its status report regarding the meetings it has held with CLEC representatives regarding the redesign of Qwest's Change Management Process ("CMP").¹ This is the first monthly status report on the redesign process. While this docket remains open, Qwest will file additional reports every month until the completion of the redesign process. Qwest proposes that CLECs and other parties to this proceeding be given a reasonable amount of time, such as two weeks, to file comments on this report, including comments regarding impasse issues identified in the report, if any.

¹ Qwest's CMP was formerly known as the "Co-Provider Industry Change Management Process" or "CICMP." The CLECs participating in that process chose to change the name to "Change Management Process."

I. INTRODUCTION AND BACKGROUND

Qwest proposed that the CLEC community participate in the redesign of the CMP to address key concerns regarding the process raised in the section 271 workshops regarding Qwest's change management process. Thus, CMP redesign sessions were established and the CLEC community has chosen core members to represent their companies. Qwest commends the CLECs for their active participation in redesigning Qwest's CMP. CLEC representatives and Qwest have discussed many issues in the twelve full days of meetings held since July 11, 2001 regarding the redesign of Qwest's CMP. As a general matter, the parties agreed to address systems issues first, then address product and process issues.

The process has resulted in the parties agreeing on interim solutions pending final approval on many issues, including the scope of CMP and escalation² and dispute resolution processes for the CMP. The parties have also agreed in principle to interim processes for change requests ("CRs") to be submitted by CLECs for systems issues, and CRs to be submitted by Qwest and CLECs relating to product and process issues. The parties have agreed upon the redesign process itself, including a process for resolution of disputes that cannot be resolved in redesign meetings. The process involves identifying impasse issues in these monthly reports. The process is:

The CLEC participants and Qwest CMP representatives will make every attempt to resolve the issue through collaborative discussions and using the Impasse Resolution Process. However, if the result of the Impasse Resolution Process remains in an impasse, there are two options to resolve this specific issue. And they are:

- Qwest will file monthly status reports regarding this process in its 271 proceedings, including in Colorado, Washington, Arizona, Nebraska, Oregon, the 7-State Process, Minnesota and South Dakota. Qwest will identify any current impasse issues in those reports, or CLECs may identify impasse issues in their comments on the reports, to be treated as impasse issues in the 271 process. If Qwest fails to file a monthly status report, a CLEC may submit the impasse issue to the commission to be treated as impasse issues in the 271 process.
- Following the date upon which a commission no longer accepts the impasse

² There remains an open issue regarding timing of Qwest's responses to escalations.

issues in a 271 proceeding, Qwest or any CLEC may submit the issue following the commission's established procedures with the appropriate regulatory agency requesting resolution of the dispute. This provision is not intended to change the scope of any regulatory agency's authority with regard to Qwest or the CLECs.

The interim solutions agreed to by the core redesign team provide that Qwest may implement the agreements made in the CMP redesign process as early as practicable, with the understanding that those agreements are subject to change until the CMP is finalized. Qwest has established a website where it has posted the redesign minutes and other materials. The website address is www.qwest.com/wholesale/cmp/redesign.

II. AGREEMENTS REACHED ARE TRACKED IN THE INTERIM DRAFT MASTER REDLINED DOCUMENT

The parties agreed to use the OBF's Issue 2233 version 1 as a starting point for discussion and a working document. Qwest agreed to track the parties' agreements in that document, which is entitled "Interim Draft Master Redlined Document." A copy of this document, reflecting agreements reached through the October 2 and 3 meetings, is attached hereto as Exhibit A. The parties have not agreed to all of the text in the Interim Draft Master Redlined Document. For ease of reference, the portions of this document that represent the parties' agreements are formatted in regular typeface, while the portions of the document that have not yet been discussed appear in italic font.

The parties have agreed that the terms "interim" and "draft" have special significance as they are used in the document title, "Interim Draft Master Redlined Document." The agreements presented in the Interim Draft Master Redlined Document are interim agreements in that Qwest can implement those agreements as soon as practicable. At the same time, the agreements remain in draft form because they are subject to change throughout the redesign process. At the end of the redesign process, the parties will review the document as a whole and make necessary changes to ensure that the discrete agreements reached regarding different issues fit together into a cohesive and integrated whole.

Significantly, the parties have agreed to the scope of CMP. *See* Exhibit A at 4-6. The Introduction and Scope reads as follows:

This document defines the processes for change management of OSS interfaces,

products and processes (including manual) as described below. CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services provided by CLECs to their end users.

The CMP is managed by CLEC and Qwest representatives each having distinct roles and responsibilities. The CLECs and Qwest will hold regular meetings to exchange information about the status of existing changes, the need for new changes, what changes Qwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.

Qwest will track changes to OSS interfaces, products and processes. The CMP includes the identification of changes and encompasses, as applicable, [requirement definition, design, development, notification, testing, implementation and disposition of changes – revisit list]. Qwest will process any such changes in accordance with the CMP described in this document.

The CMP is dynamic in nature and, as such, is managed through the regularly scheduled meetings. This document may be revised, through the procedures described in section (X).

The parties also agreed to an escalation and dispute resolution process. *See* Exhibit A at 33-35, 39-40. In order to address CLEC concerns that multi-level escalations are too time-consuming, Qwest agreed to a single level escalation process where Qwest provides a single binding position on the issue. Qwest must respond to escalations within 7 days if it relates to a CR; otherwise, Qwest must respond within 14 days. The dispute resolution process allows the parties to agree to resolve the dispute through alternative dispute resolution or to submit the issue to an appropriate regulatory agency.

The parties have also reached agreement in principle regarding interim processes pursuant to which the CLECs will submit CRs relating to systems issues and Qwest and the CLECs will submit CRs relating to product and process issues.

The interim process for Qwest-generated product and process changes was developed in response to concerns raised by CLECs. Several CLECs submitted a "Written Summary Regarding Qwest's Proposed Process for Qwest Changes to Product, Process, and Technical Documentation Submitted to CMP & CMP Re-Design Team by CMP Participants Allegiance, AT&T, Covad,

Eschelon, Integra, Sprint, and WorldCom," dated September 25, 2001. In this joint submission, attached as Exhibit H, the CLECs described several specific concerns regarding Qwest's proposed process for Qwest changes to products, processes, and technical documentation and publications. In response to these concerns, Qwest immediately developed a proposal to address the issues the CLECs raised and presented it at the next CMP redesign meeting. Qwest's proposed solution was discussed and modified by the parties, resulting in the parties' agreement to the Interim Qwest Product/Process Change Management Process set forth in Exhibit E.

Exhibit E sets forth the Interim Qwest Product/Process Change Management Process governing Qwest's submission of CRs regarding product/process issues. The agreed process provides that Qwest will submit a CR for changes to products/processes that alter CLEC operating procedures, including the proposed changes in redlined form, if practicable, or with the changes highlighted if redlining is not practicable. In either case, Qwest will also include a historical log listing each change, the version of the document changed, the date of the change, and the reason for and source of the change. The process also provides for discussion of Qwest's product/process CR at the CMP meetings and a period for CLEC comments. For changes that do not alter CLEC operating procedures, Qwest must provide notice of the changes in the same format required for changes that do alter CLEC operating procedures, and a period for CLEC comment. Any issue relating to either type of change that cannot be resolved may be submitted through the escalation and dispute resolution processes.

Exhibits F and G are flow charts that depict the interim processes regarding CLEC CRs for product/process and for systems, to which the parties have agreed in principle.

In addition, the parties have agreed to provisions relating to the management, structure, and logistics of Qwest's CMP meetings. *See* Exhibit A at 22-30.

III. ISSUES DISCUSSED IN CMP REDESIGN MEETINGS

In the meetings to date, the parties' discussions have touched on a wide range of issues. Copies of the meeting minutes from the meetings held to date are attached here to as Exhibit B. Specifically, the parties have addressed the following issues on the Washington Issue Log for Workshop No. 4: Section 12, General Terms and Conditions, CICMP, BFR, July 9-July 18 and July 31-August 1, 2001.

Clarity and accessibility of Qwest CICMP documents (Issue CM-1). The parties have discussed the need and ability to clarify and make available Qwest's CMP documents. Qwest has agreed to CLEC requests to enhance the design of the CMP website to increase ease of navigation and locating specific documents. Qwest continues to improve its web site.

Definition and adequacy of Qwest's escalation and dispute resolution process (Issue CM-2). The parties have discussed and agreed upon an escalation and dispute resolution process for the CMP. Those processes are set forth at pp. 33-35, 39-40 of Exhibit A. As described above, these agreements will remain in draft form until the conclusion of the redesign process in order to allow for any necessary adjustments.

Five categories of changes in SBC documents (Issue CM-3). While the parties have not fully discussed or reached agreement on the categories of changes to be included in Qwest's CMP, Exhibit A includes all five categories of system changes included in SBC's documents. Those categories are listed in Exhibit A under the heading "Changes to Existing Interfaces." Qwest has already implemented the five categories of changes in its OSS CMP process.

Performance measurements for change management (Issue CM-4). Performance measurements for CMP are being discussed in the ROC TAG and are not a subject of the redesign meetings. To date, the parties have agreed upon one new performance measurement, PO-16, which measures timeliness of release notifications. The ROC TAG discussions regarding other change management measures are continuing.

Repair process subject to change management (Issue CM-5). Qwest has committed to including repair processes in CMP. The parties' agreement on the scope of the CMP reflects that commitment. *See* Exhibit A at pp. 4-6.

Frequency of scheduled CICMP meetings (Issue CM-6). The parties have agreed that CMP will be conducted on a regularly scheduled basis, at least on a monthly basis. At the CLECs' request based on the volume of issues to be addressed at these monthly forums, Qwest agreed to change the monthly forum format to include two separate full day meetings, with one full day dedicated to system CMP issues and one full day dedicated to product and process CMP issues.

Qwest-generated CRs (Issue CM-7). Qwest has committed to include Qwest originated CRs regarding existing interfaces where the proposed change would require a CLEC to make internal changes, such as software design and/or code for an application-to-application interface, in order to take advantage of the enhancement or new functionality, process or product. As stated above, the parties have not yet discussed the types of changes that will be subject to the CR process.

Proprietary CR (Issue CM-8). Exhibit A currently does not contain provisions for proprietary CRs. The parties have not discussed whether to include proprietary CRs in the process.

EDI draft worksheet availability (Issue CM-9). Qwest has committed to comply with the Requirements Review section of Exhibit A, which contains the OBF timeframes of 73 days for change notification of Type 4 and 5 changes, 66 days for delivery of draft business rules and technical specifications, and 45 days for change confirmations through publication of final business rules and technical specifications. The redesign team has not yet discussed this issue.

Whether CLECs have had input into the development of the CMP (Issue CM-10). CLECs are actively participating in the redesign meetings.

WCom not allowed to vote on EDI CRs (Issue CM-12). This issue has not yet been addressed in the redesign meetings.

Scope of CMP (Issue CM-13 and 16). The parties have reached agreement regarding the definition of the scope of the CMP, which is set forth in the Interim Draft Master Redlined Document. *See Exhibit A, Introduction and Scope, at pp. 4-6.*

Whether Contents of Exhibit G should be included in SGAT (Issue CM-14). Qwest has conceded this issue, and the parties to the redesign effort have discussed revisions to SGAT Section 12.2.6. Qwest has made some changes to Section 12.2.6 at the request of CLECs, but the parties have not agreed upon the language in the entire paragraph. Qwest's proposal regarding Section 12.2.6 is attached as Exhibit C.

Whether Contents of Exhibit H should be included in SGAT (Issue CM-15). Qwest has conceded this issue, and the parties to the redesign effort have discussed revisions to SGAT Section 12.2.6. Qwest has made some changes to Section 12.2.6 at the request of CLECs, but the parties

have not agreed upon the language in the entire paragraph. Section 12.2.6 refers to just Exhibit G, because Exhibit H (the escalation process) is now included within Exhibit G. Qwest's proposal regarding Section 12.2.6 is attached as Exhibit C.

Processes for notification of CLECs and adequacy of process (Issue CM-17). While the parties have not reached final agreement regarding notification processes, they have reached agreement on the basic categories of notifications and a naming convention for Qwest's CLEC notifications.

Documents described and as yet unidentified or unknown, which include the change request prioritization process and other links (Issue CM-18). The change request prioritization process will be addressed at future redesign meetings.

IV. SCHEDULE FOR REMAINING DISCUSSIONS

The schedule of upcoming meetings, including proposed subjects, is attached as Exhibit D and is subject to change based on the progress made by the parties.

V. CONCLUSION

Qwest appreciates the time and effort the CLECs have devoted to participating in the redesign of Qwest's CMP. Qwest is confident that the collaborative redesign process will result in an effective CMP that meets CLEC needs and is consistent with industry practices.

RESPECTFULLY SUBMITTED this 11th day of October, 2001.

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