

**TI 520**  
**EXCEPTION 3038—DISPOSITION REPORT**  
Qwest OSS Evaluation

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Initial Release Date: September 11, 2001  
First Response Date: October 3, 2001  
Second Response Date: October 25, 2001  
Disposition Report Date: December 11, 2001

**EXCEPTION DISPOSITION REPORT**

**Exception:**

**The DSL Loop Qualification capabilities provided to wholesale service providers do not appear to be in parity with those available to Qwest's retail operations.**

**Summary of Exception:**

Qwest provides loop qualification tools to CLECs that are intended to provide them with the capability to determine whether a customer's loop qualifies for DSL and related services. Qwest also uses various tools to make this determination for its own retail customers.

KPMG Consulting's initial testing activities included on-site interviews and observations at the Qwest wholesale and retail service centers that process DSL orders. The results of these initial activities indicated the following:

The tools that Qwest makes available to CLECs use distance measurements between the Qwest Central Office and the customer premises as the sole basis for a positive or negative response. In addition to this basic functionality, Qwest retail centers also have access to backend Operational Support Systems, such as a facilities database, that provide Qwest retail service representatives with additional loop information, such as the presence of load coils or bridge taps. These additional tools give Qwest the ability to provide more accurate and timely information to its retail customers prior to submitting an order for DSL service. Without access to comparable tools, CLECs are not able to fully determine whether its customers qualify for DSL service until after an order has been submitted.

***Qwest Formal Response:***

Qwest reviewed the KPMG interview summary for the wholesale representatives' interview. The interviewees did not have complete knowledge of the tools currently provided to CLECs for determining whether a customer's loop qualifies for DSL and related services. Qwest issued a Multiple Channel Communicator (MCC), on 10/24/01, to re-state how Qwest provides complete and up to date Raw Loop Data (RLD) for wholesale entities. The MCC was issued to emphasize what tools are provided for determining customers' loop qualification. On 10/31/01, the interviewees supplemented their interview summaries to correct any misinformation resulting from their

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unfamiliarity with the tools currently being utilized by CLECs. The change to IMA EDI 7.0 loop qualification functionality was implemented on 10/30/01. The Megabit Services Loop Qualification Guide was submitted to KPMG Consulting on 10/23/01. The Unbundled ADSL Loop Qualification process flow and step action table was submitted to KPMG Consulting.

**KPMG Consulting's Disposition Report (12/12/01):**

After conducting additional interviews and observations with Qwest personnel, KPMG Consulting is satisfied that the DSL Loop Qualification capabilities provided to wholesale service providers are in parity with those available to Qwest's retail operations. This conclusion is based on supplemental information to previously submitted interview summaries, updates to IMA EDI Release 7.0 Raw Loop Data Query, and updates to the MCC describing tools available for loop qualification.

**Based on retest results, KPMG Consulting recommends that Exception 3038 be closed.**