

New Mexico
Utility Case No. 3495, Phase B
Staff 03-005

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 005

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver)

Did SMEs involved in providing estimates rely on information gathered from other Qwest employees such as the technicians who actually do the work? If the answer is yes, what process was used in gathering that information? If the answer is no, why weren't these experts consulted.

RESPONSE:

The SMEs are typically experienced at performing the activities or have supervisory responsibility for the people who perform the activities. In addition, the SMEs are instructed to obtain the process information from experts who actually do the work, are proficient at performing the tasks and have a minimum of 1 to 2 years experience performing the work activities. The staff expert and technician(s) collaborate to develop the documentation provided to the cost analyst for cost support. The experts' opinions of the estimates are determined based on the key assumptions for the nonrecurring cost studies, including the requirement that the estimates be forward looking for 12 to 18 months.

Respondent: Jennifer Peppers

New Mexico
Utility Case No. 3495, Phase B
Staff 03-006

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 006

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver)

How was the concept of "forward-looking" described to the SMEs?

RESPONSE:

As noted in the supporting documentation, a 12 to 18 month forward looking timeline is to be considered when identifying processes, times and probabilities for cost development. This means that the SMEs are asked to include process improvements for the work activities in their estimates, as well as system changes or improvements that are planned for the next 12 to 18 months.

Respondent: Jennifer Peppers

New Mexico
Utility Case No. 3495, Phase B
Staff 03-009

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 009

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver, TAB 3, Page 1 of CTCTIMES.XLS: Certain process times and probabilities appear to have been provided by a single SME. For example, the process times for UNE-P POTS, CTC appear to have been received from Sami Hooper. Is it true that Sami Hooper was the only SME involved in providing estimates for this particular service?)

Please provide a copy of the written instructions relied upon by Sami Hooper in preparing the time estimates referenced above.

RESPONSE:

Ms. Hooper is the SME who provided the estimates for UNE-P POTS and CTC. However, as described in response to 3-05, Ms. Hooper collaborated with other experts and technicians for the process times provided. The instructions were the same as explained in the previous responses.

Respondent: Jennifer Peppers

New Mexico
Utility Case No. 3495, Phase B
Staff 03-010

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 010

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver, TAB 3, Page 1 of CTCTIMES.XLS: Certain process times and probabilities appear to have been provided by a single SME. For example, the process times for UNE-P POTS, CTC appear to have been received from Sami Hooper. Is it true that Sami Hooper was the only SME involved in providing estimates for this particular service?)

In the above referenced document at TAB 3, the task times appear to be in whole number increments rather than minutes and seconds. Were the SMEs provided instructions with respect to rounding task times?

RESPONSE:

The SMEs are instructed to estimate in whole minutes unless the task can be estimated in fractions of a minute. Fractions of a minute imply that the information can be proven to the level provided. The time estimates in these studies are intended to be averages based on the consideration of the key assumptions for making the estimates.

Respondent: Jennifer Peppers

New Mexico
Utility Case No. 3495, Phase B
Staff 03-011

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 011

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver, TAB 3, Page 1 of CTCTIMES.XLS: Certain process times and probabilities appear to have been provided by a single SME. For example, the process times for UNE-P POTS, CTC appear to have been received from Sami Hooper. Is it true that Sami Hooper was the only SME involved in providing estimates for this particular service?)

Please provide the written documentation prepared by Sami Hooper detailing the range of times estimated for each task estimated from the above referenced document.

RESPONSE:

The document behind Tab 3 is the written document received from Sami Hooper. The times are not provided in ranges, rather they are provided as average estimates of the tasks performed.

Respondent: Jennifer Peppers

New Mexico
Utility Case No. 3495, Phase B
Staff 03-017

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 017

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver, at TAB 10:)

Please provide a copy of the data provided by the SMEs referred to in the preceding question above.

RESPONSE:

As described in response to 3-05, the process of determining time and probability estimates is often a collaborative process wherein a group of experts and technicians meet to discuss the tasks and work activities performed. During that collaborative process each participant provides input, the estimates are determined and the data resulting from the group's consensus is provided to the cost analyst. No other data from the SMEs is provided to the cost analyst.

Respondent: Jennifer Peppers

New Mexico
Utility Case No. 3495, Phase B
Staff 03-018

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 018

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver, at TAB 10:)

If there was a range of estimated task times and probability of occurrence percentages obtained from the group of SMEs, how was the appropriate task time or probability of occurrence percentage selected from the range?

RESPONSE:

It is the understanding of the cost analyst that the SMEs consult with other experts, as described in response to 3-05 and 3-17, and determine the appropriate time estimate and probability of occurrence to apply. These discussions may result in both a range of times and averages agreed upon by the group to develop the final estimate in a collaborative process. The SMEs ultimately provide average times and probabilities to the cost analyst based on the key assumptions they are directed to consider.

Respondent: Jennifer Peppers

New Mexico
Utility Case No. 3495, Phase B
Staff 03-022

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 022

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver, at TAB 11:)

The workpaper headed "LIS-EF" contains a section entitled "NOTE". Within that section, it is noted that "The times documented above are the average estimates." Please provide the entire range of estimates, including the minimum and maximum estimates for each and every task time documented and used in the ENRC study used by Qwest to calculate nonrecurring costs in this Docket.

RESPONSE:

No range of estimates including minimum and maximum are documented. Rather, as described in response to 3-18, the SMEs provide the cost analyst with average times and probabilities. The averages are based on the key assumptions on the page at the front of this tab.

Respondent: Jennifer Peppers

New Mexico
Utility Case No. 3495, Phase B
Staff 03-023

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 023

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver, at TAB 76:)

There are numerous references to the times contained within the document being "forward looking" (for example at the above referenced TAB, on the second page of the document entitled Unbundled Switch - ISC Times Dated 6-12-01. What is the basis for the assumption that the times are forward-looking?

RESPONSE:

As explained in response to request 3-06, the SMEs are instructed to provide times and probability percentages based on the key assumptions of a forward looking nonrecurring cost study, including a 12 to 18 month forward looking timeline that takes into effect anticipated system and process improvements.

Respondent: Jennifer Peppers

New Mexico
Utility Case No. 3495, Phase B
Staff 03-024

INTERVENOR: New Mexico Public Regulation Commission (Staff)

REQUEST NO: 024

(Reference the Qwest document entitled "NONRECURRING ELEMENTS - NEW MEXICO" provided to Mr. Sid Morrison and Mr. Mark Stacy of QSI Consulting at the Qwest/New Mexico Technical conference held February 7 and 8, 2002 at the Qwest headquarters in Denver, at TAB 76:)

Are the probabilities of occurrence percentages found throughout the document, and throughout the ENRC (see the question immediately preceding this one for an example) also assumed to be forward-looking? What is the basis for the assumption that the percentages are forward-looking?

RESPONSE:

As explained in response to request 3-06, the SMEs are instructed to provide times and probability percentages based on the key assumptions of a forward looking nonrecurring cost study, including a 12 to 18 month forward looking timeline that takes into account anticipated system and process improvements.

Respondent: Jennifer Peppers