

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

**AFFIDAVIT OF JUDITH M. SCHULTZ REGARDING
CHANGE MANAGEMENT**

Qwest Corporation ("Qwest") submits this Affidavit of Judith M. Schultz regarding
Change Management.

QUALIFICATIONS

1. My name is Judith M. Schultz. I am a Director in the Qwest Corporation
wholesale service delivery organization. My office is located at 1005 17th Street, Denver, Colorado. I
have been employed by Qwest for approximately 20 years (previously known as Mountain Bell and U
S WEST). I have held a variety of positions at Qwest, including sales, senior quality management,
program management, product management, product development, and wholesale systems planning. I
am currently Director -- Change Management and am responsible for directing the change management
process redesign effort and managing the implementation of Qwest's change management process.

I. PURPOSE OF AFFIDAVIT

2. The purpose of this affidavit is to show that Qwest and its competitive local exchange carrier (CLEC) counterparts have worked together to develop and implement a robust change management plan. This affidavit describes Qwest's change management process. Using the FCC's prior decisions as a guideline, I show how Qwest's CMP satisfies the following four factors relied upon by the FCC to evaluate a BOC's change management plan: 1/ "(1) information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) competing carriers [have] substantial input in the design and continued operation of the change management process; (3) the change management plan defines a procedure for the timely resolution of change management disputes;" and (4) "the BOC has demonstrated a pattern of compliance with [its change management plan.]" 2/

II. THE CHANGE MANAGEMENT PROCESS (CMP)

A. Background on the Development of Qwest's Change Management Process

3. Since 1999, Qwest and CLECs have jointly participated in a forum for managing changes related to Qwest's products, processes, and systems that support the five categories of OSS functions (pre-ordering, ordering, provisioning, maintenance and repair, and billing). This

1/ Three additional factors used by the FCC to evaluate a BOC's change management plan are being evaluated in the Regional Oversight Committee's (ROC) test of Qwest's Operations Support Systems (OSS). Those factors evaluate whether Qwest provides CLECs with access to a stable testing environment, whether its electronic data interchange (EDI) documentation is efficacious, and whether Qwest provides adequate assistance to CLECs to support the use of its OSS functions. *See Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Arkansas and Missouri*, CC Docket No. 01-194, Memorandum Opinion and Order, FCC 01-338 (rel. Nov. 16, 2001) ("Arkansas/Missouri 271 Order"), Appendix D, ¶ 42.

Qwest-CLEC forum was previously known as the “Co-Provider Industry Change Management Process” or “CICMP” and is now known as the Change Management Process or “CMP.”^{3/} The change management process is used to process and communicate to CLECs any changes to Qwest’s OSS Interfaces and to products and processes that are within the scope of CMP.^{4/}

4. The CMP also provides CLECs the opportunity to provide input into Qwest changes and to propose their own. The CLECs and Qwest meet collaboratively at least two days each month to consider such change requests, referred to as "CRs", which may include CLEC-Originated CRs, Qwest-Originated CRs, Industry Guideline CRs, and Regulatory CRs. Minutes from these meetings are posted on Qwest’s CMP website and distributed to participating CLECs regularly.^{5/}

5. The CLECs and Qwest jointly prioritize CLEC Originated CRs and Qwest Originated CRs for OSS Interfaces and test environments. If the change requests for any interface or test environment do not exceed release capacity, no prioritization for that release is required. In addition, the CLECs have the ability to prioritize Industry Guideline CRs and Regulatory CRs if these types of changes have a date certain for implementation, in the case of Regulatory CRs, or a

^{2/} *Arkansas/Missouri 271 Order*, App. D at ¶ 42.

^{3/} At the August 15, 2001 CMP meeting, CLEC voted to change the name of the CICMP to CMP.

^{4/} Qwest's change management process is set forth in the Qwest Wholesale Change Management Document (Wholesale CMP). The CMP Redesign core team agreed to define the term ‘OSS Interfaces’ as “existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users.” *See* Wholesale CMP (fn. 1 of every page), which is attached as Exhibit A.

^{5/} Prior to October 2001, these meetings were held one day a month. In recognition of the need to devote more time to discussing changes, Qwest began holding CMP meetings two full days a month, with one day devoted to systems issues and one day devoted to products and process issues.

recommended implementation date, in the case of Industry Guideline CRs, and Qwest determines that the changes can be implemented in more than one release and still meet the required date.

6. Changes to Qwest OSS interfaces, products, or processes must be communicated to CLECs according to agreed-upon timeframes contained in the CMP. Qwest also provides to CLECs, on a quarterly basis, its twelve-month Development View, which shows, at a high level, the development plans for all OSS interfaces that Qwest provides to CLECs. This information helps CLECs plan for upcoming OSS changes.

7. The CMP procedures are described in much greater detail below.

B. The Redesign Process

8. In June 2001, Qwest entered into a collaborative effort with the CLEC community to redesign its change management procedures. The Qwest team involved in the CMP redesign works at my direction.

9. The redesign team has been meeting, generally twice a month, since July 2001. Redesign meetings are separate from the regular CMP meetings, which are held primarily to discuss change requests. Although Qwest hoped to complete the redesign effort by December 2001, it is now likely to be completed during the first half of 2002. [6/](#)

10. The redesign effort provides an opportunity for CLECs and Qwest to jointly redesign the change management process. As agreements are reached through this process, Qwest has

[6/](#) Information about the CMP Redesign can be found at: <http://www.qwest.com/wholesale/cmp/redesign.html>.

implemented the agreed-upon changes as soon as practicable. The redesigned CMP is contained in the Wholesale CMP. ^{7/}

11. Although the FCC, in its Section 271 review, appears to require that change management procedures be implemented only for changes to OSS interfaces, ^{8/} Qwest has agreed to include in its redesigned change management plan changes to products and processes as well. ^{9/} The redesign negotiation process is complete with respect to all substantive systems issues. Qwest and the CLECs have worked out processes for all aspects of the systems CMP, including discussing and revising the OBF language, and the agreed-upon processes have been implemented. The end result is a complete change management process with only one impasse issue (whether OBF language that treats changes to meet performance measurements as regulatory changes should be included in the Qwest CMP definition of Regulatory Changes). This impasse issue does not impact Qwest's compliance with the requirements of Section 271.

^{7/} In addition, Qwest maintains a document that is referred to by the Qwest/CLEC redesign team as the "Interim Draft Master Red-lined CLEC-Qwest CMP Redesign Framework" (hereafter referred to as the "Master Red-lined Framework"). It is continuously updated to incorporate the most recent agreements arrived at through the redesign process. The document can be found on Qwest's CMP website at the following URL: <http://www.qwest.com/wholesale/cmp/redesign.html> in the "Redesign Documentation" section. The Master Red-lined Framework is redlined to show changes from the initial draft which was based on the Ordering and Billing Forum (OBF) Issue 2233, Version a1v1, the agreed upon starting point for negotiations. As noted in that document, italicized text represents OBF language not yet discussed by the team.

^{8/} To my knowledge, the FCC consistently has defined and evaluated BOC change management procedures in terms of systems changes only. In addition, OBF Issue 2233 does not contain any provisions for product or process changes.

^{9/} The term "products and processes" refers to retail *products* that are resold by CLECs and to BOC *processes* (not systems) that CLECs interact with or use in their local telecommunications businesses. These terms are discussed further below.

12. With respect to products and processes, the redesign effort produced procedures governing CLEC-initiated change requests, which Qwest implemented. ^{10/} Qwest also implemented interim procedures for handling Qwest-initiated products and process changes. Further negotiations on products and processes should be completed by the middle of 2002, if not sooner.

13. The core team that is meeting to redesign the change management process is composed of representatives from several CLECs, and Qwest. ^{11/} Participation in the redesign process is open to all CLECs, and meetings are open. In addition, the Colorado Public Utilities Commission staff attended sessions, as have representatives of CapGemini Ernst & Young (a third party test consultant in Arizona) and KPMG Consulting (a third party test consultant in the 13 Regional Oversight Committee (ROC states).

14. The CLEC/Qwest redesign team agreed to begin with OBF Issue 2233, version a1v1, as a starting point for negotiating the redesigned change management procedures. OBF Issue 2233 refers to a forum for industry-wide deliberations on development of national guidelines pertaining to change management. To date, almost all of the OBF document has been negotiated and base-lined, as reflected in the Wholesale CMP. ^{12/} These include:

- Introduction and Scope
- Types of Change
- CMP Escalation and Dispute Resolution Processes

^{10/} See Wholesale CMP § 3.3 (Exhibit A).

^{11/} Generally, about eight CLECs participate at each Redesign session. Those CLECs are Allegiance Telecom, AT&T, Covad Communications, Eschelon Telecom, Integra, SBC Telecom, Sprint, and WorldCom.

^{12/} The parts of the OBF language that have yet to be agreed upon are indicated by italics in the Wholesale CMP.

- CLEC and Qwest Originated OSS Interface Change Request Initiation Processes
- CLEC Originated Product/Process Change Request Initiation Process
- Changes to Existing OSS Interfaces
- Introduction and Retirement of OSS Interfaces
- Prioritization
- Interface Testing
- Production Support
- Technical Escalation Process
- Meetings, Scope, and Production Support

15. Qwest implemented each section, as promptly as possible, once agreement was reached. The parties have agreed that, upon completion of the redesign process, they will have the opportunity to revisit any part of the redesigned plan in light of the whole.

16. The group adopted procedures to govern meetings and other aspects of the redesign process. The rules specify the information that is to be circulated electronically prior to the meetings. Minutes of each meeting are recorded by Qwest, circulated to participants for revision, then finalized and posted on the CMP website. CMP rules also specify the minimum content for the website. [13/](#)

17. CLECs and Qwest make every effort to achieve consensus. On rare occasions when consensus is not reached, there are specified procedures for resolving an impasse. Disputes are resolved by state regulatory commissions, either in an existing Section 271 docket or in a new proceeding. The dispute resolution process is discussed in more detail below.

[13/](#) See Wholesale CMP § 8.3 (Exhibit A).

18. Qwest has undertaken substantial efforts to train its personnel on the requirements of the CMP and to keep its personnel updated on current CMP requirements. Over 9,000 Qwest employees and contractors have successfully completed the first module of mandatory internal training regarding the CMP Redesign.

19. The redesign process is only one stage in the evolution of change management. While Qwest is committed to abide by the agreed upon redesigned CMP, the CMP remains open to additional changes that could continue to modify the CMP over time. ^{14/} The FCC has recognized that the change management process is evolutionary by definition:

We do not expect any change management plan to remain static. Rather, a key component of an effective change management process is the existence of a forum in which both competing carriers and the BOC can work collaboratively to improve the method by which changes to the BOC's OSS are implemented.^{15/}

Qwest's Change Management Process

20. The following sections describe the current Qwest change management process. This process is the outcome of the collaborative Qwest/CLEC CMP redesign process described in the previous section. For convenience, the following sections describing the change management process track in order the sections of the Wholesale CMP, insofar as possible. That document embodies the change management procedures under which Qwest now operates.

¹⁴ Wholesale CMP § 1.0 (Exhibit A).

^{15/} *Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas*, CC Docket No. 00-65, Memorandum and Opinion Order, FCC 00-238 (rel. June 30, 2000) ("*Texas 271 Order*"), at ¶ 117.

1. Scope

21. The scope of Qwest's Change Management Process, as agreed upon by

CLECs and Qwest in the collaborative redesign process, is defined as follows:

This document [the Wholesale CMP] 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. [16/](#)

2. Types of Changes

22. The redesign team reached agreement on procedures governing the following

types of changes to OSS interfaces with the exception of certain components of Regulatory Changes:

[17/](#)

- (1) Regulatory Changes: A Regulatory Change is a change that “is mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. Either the CLEC or Qwest may initiate the change request.” [18/](#)
- (2) Industry Guideline Changes: An Industry Guideline Change is a change made to implement Industry Guidelines using a national implementation timeline, if any. Either Qwest or the CLEC may initiate the change request. These guidelines are industry-defined by the following organizations:
 - Alliance for Telecommunications Industry Solutions (ATIS)

[16/](#) Wholesale CMP § 1.0 (Exhibit A).

[17/](#) Wholesale CMP § 2.0 (Exhibit A).

[18/](#) Wholesale CMP § 2.1 (Exhibit A). Qwest and the CLECs reached agreement on the meaning of “regulatory change” at the February 19 redesign session. However, the PID/PAP impasse issue was not resolved.

- Ordering and Billing Forum (OBF)
- Local Service Ordering and Provisioning Committee (LSOP)
- Telecommunications Industry Forum (TCIF)
- Electronic Commerce Inter-exchange Committee (ECIC)
- Electronic Data Interface Committee (EDI)
- American National Standards Institute (ANSI)

- (3) Qwest-Originated Changes: A Qwest Originated change is a change that is originated by Qwest, does not fall within the changes listed above, and is within the scope of CMP.
- (4) CLEC-Originated Changes: A CLEC Originated change is a change that is originated by a CLEC, does not fall within the changes listed above, and is within the scope of CMP.

3. CLEC or Qwest OSS Interface Change Request Initiation Process

23. The procedures governing CLEC or Qwest initiated requests for changes to OSS interfaces are set forth in Section 3.1 of the Wholesale CMP (Exhibit A). The first step in the process is for the CLEC or Qwest change request initiator to e-mail a complete change request form to the Qwest Systems CMP Manager. ^{19/} The change request form is included on the Qwest CMP website, together with instructions for completing and e-mailing the form. Qwest’s CMP Manager assigns a CR tracking number, logs it into the CMP database, and sends acknowledgment of receipt to the originator and update the CMP database.

24. Within eight business days of receipt of a complete CR, the CR Project Manager (CRPM) holds a clarification meeting with the originator and the Qwest SMEs unless the CR originator is not available within the above specified time frame. At the meeting, “Qwest and the originator will review the submitted CR, validate the intent of the originator, clarify all aspects, identify all

^{19/} See Wholesale CMP § 3.1 (Exhibit A).

questions to be answered, and determine deliverables to be produced.” [20/](#) Within five business days, the CR Project Manager must document and issue minutes of the meeting.

25. If a CR is received within 3 weeks of the next scheduled CMP meeting, it will be presented and “clarified” at that meeting. After presentation of the CR by the originator and discussion of issues identified at the CMP meeting, the CR may be modified. Qwest also provides a level of effort for those OSS interface CRs provided 21 days in advance of the CMP meeting.

26. Qwest's response to a CR will be either "accepted" or "denied." If Qwest accepts the CR, Qwest must include in its response a determination and presentation of the options for implementation and identification of the preliminary level of effort required in terms of a range of hours. If Qwest denies a CR, Qwest's response must include the basis for its denial, with reference to substantiating material.

27. If the CLECs do not accept a Qwest denial, they may escalate the denial, seek dispute resolution, or defer further consideration of the CR until a later date. Accepted systems CRs move into the prioritization process, which are discussed below.

4. CLEC-Originated Product and Process Change Requests

28. The procedures for CLEC-initiated changes to Qwest products and processes are similar to the procedures for changes to systems interfaces. They are set forth in Section 3.3 of the Wholesale CMP. [21/](#)

[20/](#) Wholesale CMP § 3.1 (Exhibit A).

[21/](#) Wholesale CMP § 3.2 (Exhibit A).

5. Qwest-Initiated Product/Process Change Requests

29. The redesign team has made progress in negotiating a process for Qwest-initiated Product/Process changes. The status of these discussions is summarized in Qwest's Report on the Status of Change Management Process Redesign filed with the Commission on February 15, 2002.

30. Currently, Qwest is following the interim set of change management procedures for Qwest-initiated changes to products and processes that are needed to address issues arising in the Section 271 workshops or during OSS testing. Interim procedures governing Qwest-initiated product and process change requests will remain in place until the parties to the redesign process complete their discussions and reach agreement on replacement procedures to govern Qwest-initiated product and process changes. These interim procedures are set forth in a document titled "Interim Qwest Product/Process Change Management Process," which may be found on the CMP website. [22/](#)

6. Prioritization of Change Requests

31. As part of the change management process, CLECs participate with Qwest in determining the priority assigned to Qwest-originated and CLEC-originated OSS Interface changes as well as Industry Guideline changes and Regulatory changes that are subject to prioritization.

32. Procedures for prioritizing changes to systems interfaces are complete. These prioritization procedures do not apply to changes that require the introduction of a new interface or retirement of an old interface; instead separate procedures apply, which are discussed below.

33. The prioritization process allows CLECs to rank CLEC-originated and Qwest-originated change requests for an upcoming IMA major release. CLECs also have the ability to

[22/](#) This document can be found at the following URL: www.qwest.com/wholesale/cmp/redesign.html

prioritize Industry Guideline CRs and Regulatory CRs in the event that these types of changes have a date certain for implementation (in the case of Regulatory CRs) or a recommended implementation date (in the case of Industry Guideline CRs) and Qwest determines that the changes can be implemented in more than one release and still meet the required implementation date. [23/](#)

34. Prioritization of major release change requests is determined through a ranking process. Qwest and all CLECs that elect to participate in the ranking assign a numeric value to a given CR. For example, if there are 10 CRs to rank, Qwest and each CLEC assign a value of 1 to 10 (with 10 indicating their highest priority) to each CR. CLECs have already used this procedure to rank CRs for the IMA 10.0 Release and the IMA 11.0 Release.

35. The redesign team has also agreed in principle to adopt a Special Change Release Process ("SCRCP"). The SCRCP will allow any participant (Qwest or any CLEC) to fund, itself, any change it wants to make in the next major release that otherwise would not have been included due to the prioritization process.

36. Given the list of priorities established through CMP, Qwest begins its development cycle, in order of priority beginning with regulatory changes and industry guideline changes, followed by the ranked CRs.[24](#) Qwest's information technology (IT) group defines the business and functional specifications for implementing the proposed changes. During this process, IT considers which CRs can be included in the upcoming release (based on release capacity, CR synergies, and other factors). Qwest then provides Packaging Options, which are different combinations of candidates

[23/](#) See Wholesale CMP §§ 9.1.1 and 9.1.2 (Exhibit A).

based on affinities among related CRs and upon efficiencies of implementing the CRs in the same release. Based on the outcome of the packaging discussion with the CLECs, which is conducted during CMP meetings, Qwest defines the architectural and code changes required for each CR and presents a final list of CRs that can be implemented.

37. If, after Qwest commits to a final list of CRs for inclusion in the release, Qwest determines that changes cannot be made in time for a planned release, Qwest notifies the CMP group and discusses alternatives. Alternatives may include, for example, removing the CR from the list or delaying the release date to incorporate the CR. Once the change is implemented as part of a release, the CR is presented for formal closure at the next CMP meeting.

7. Introduction of New OSS Interfaces

38. The introduction of new OSS interfaces is subject to the change management process. The redesign team has developed procedures governing such changes, which are set forth in Section 4.0 of the Wholesale CMP. [25/](#) These procedures give CLECs advance notice of the introduction of new OSS interfaces; provide them with adequate information, documentation, and training in advance; and provide an opportunity for CLEC input into the process.

a. Introduction of New Application-to-Application Interfaces

39. At least nine months in advance of the target implementation date for a new application-to-application interface, Qwest issues a Release Announcement and posts on its website the Preliminary Interface Implementation Plan.

[24](#) See Wholesale CMP § 3.2 (Exhibit A).

[25/](#) See Wholesale CMP § 4.0 (Exhibit A).

40. These documents include, where practicable, the following: (1) the proposed functionality of the interface; (2) proposed implementation timeline (including comment cycle); (3) proposed meeting date for review of the preliminary plan; (4) exceptions, if any, to industry guidelines or standards; and (5) planned implementation date.

41. CLECs have 14 days from the Initial Release Announcement to provide written comments on the documentation. Qwest responds to CLEC comments within 21 days of the Initial Release Announcement. Qwest reviews these issues and the implementation schedule at the Preliminary Implementation Plan Review Meeting, which is held approximately 28 days after the Initial Release Announcement.

42. Qwest provides draft technical specifications to CLECs at least 120 days before implementation of a new interface, with the applicable content defined in the CMP procedures. Qwest also holds a walk-through with CLECs between 106-110 days before implementation, to afford CLEC subject matter experts (SMEs) the opportunity to ask questions and discuss specific technical requirements with the Qwest SMEs.

43. CLECs may send written comments or concerns to Qwest's Systems CMP Manager no less than 104 days before implementation. Qwest responds to CLEC questions, concerns, and action items in writing no later than 100 days before implementation. The responses are shared with all CLECs, unless marked proprietary, and any changes are set forth in the final notification letter and in the final specifications.

44. Generally, no less than 100 days prior to implementation, Qwest issues the Final Release Requirements via website posting and CLEC notification. This document will include: (1) the final notification letter, (2) summary of changes from Qwest response to CLEC comments on the Draft

Technical Specifications, (3) if applicable, indication of type of change, (4) purpose, (5) reference to final technical specifications or web site address, (6) additional pertinent material, (7) final connectivity and firewall rules, (8) final test plan (including joint testing period), and (9) release date.

45. Qwest's planned implementation date is no sooner than 100 calendar days from the date of the final release requirements. Production support changes can occur during the 30-day test window and are posted to Qwest's website within 24 hours of the change.

b. Introduction of New GUI Interfaces

46. The procedures for issuing a new graphical user interface (GUI)²⁶ are less involved than procedures for a new Application-to-Application interface because the CLEC is not required to make changes to its systems in order to use the new GUI interface (although it may need to make changes to its business processes). When introducing a new GUI interface, Qwest issues a Release Notification 45 days in advance of the Release Production Date. The release notification includes the proposed functionality, implementation timeline, implementation date, and logistics for the GUI Interface Overview.

47. Not less than 28 days prior to the target implementation date, Qwest issues a Release Announcement, with a draft user guide and information about training. Not less than 27 days prior to the target implementation date, Qwest holds an Interface Overview meeting with CLECs. At least 25 days before implementation, CLECs may forward their comments and concerns, if any, to Qwest. Qwest reviews written CLEC comments and concerns and may address them with the release of the Final Notification. The Final Notification is issued not less than 21 days prior to implementation,

²⁶ Wholesale CMP § 4.2 (Exhibit A).

and includes a summary of changes from the original notice, a final user guide, final training information, and the final implementation date.

8. Changes to Existing OSS Interfaces

48. The redesign team has agreed upon a set of procedures that govern Qwest's implementation of changes to existing systems interfaces. These procedures are set forth in Section 5.0 of the Wholesale CMP. Pursuant to the procedures, Qwest provides at the first CMP meeting of every quarter a rolling 12-month view of its OSS development schedule for both Application-to-Application interfaces and GUI. As noted in the CMP framework, Qwest's standard operating procedure for IMA interfaces is to implement three major releases and three point releases within a calendar year. CMP procedures permit Qwest to implement no more than four releases per OSS interface that require coding changes to the CLEC interfaces within a calendar year, unless additional requirements are mandated by a regulatory authority. The CMP provides further that major release changes should occur no fewer than three months apart.

c. Versioning

49. Qwest maintains the previous version of IMA-EDI for six months after the release of a new version of IMA-EDI. "Versioning" permits CLECs to decide when they are ready to implement the new version by allowing CLECs to use the older version for as long as they choose during the six-month period. ^{27/} Past versions can only be modified as a result of production support

^{27/} The FCC has found versioning useful to a BOC's demonstration that its change management process affords competing carriers a meaningful opportunity to compete because it "ensures that system changes and enhancements do not adversely affect a carrier's ability to access the BOC's OSS." *See Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc., for Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket No. 01-9, Memorandum and Opinion Order, FCC 01-130 (rel. Apr. 16, 2001), ¶ 107 (quoting *Texas 271 Order* at ¶ 115).

changes; other changes must be included in future releases. Unlike IMA-EDI, Qwest makes one version of a GUI, such as the Electronic Bonding – Trouble Administration (EB-TA) and billing interfaces, available at any given time because CLECs access GUIs through web-based connections and changes to GUIs do not require CLECs to modify any coding.

d. Changes to application-to-application interfaces

50. For application-to-application interfaces, the CMP establishes timeframes for the notification and distribution of information about interface changes. Qwest provides draft technical specifications needed to enable CLECs to code the interface change at least 73 days prior to implementation of the release, unless the exception process has been invoked. [28/](#) CLECs may provide written comments on the technical specifications within 18 days from the date of initial publication of the specifications. Between 58 and 68 days prior to implementation, Qwest sponsors a walk-through to afford CLEC SMEs and Qwest SMEs the opportunity to ask each other questions and discuss technical requirements. CLECs may provide written comments on the draft technical specifications no less than 55 days prior to implementation. Qwest provides written responses to CLEC questions, concerns and action items remaining from the walk-through no less than 45 days prior to implementation, and shares those responses with all CLECs.

51. Any resulting changes are incorporated into the final technical specifications and included in the final notification letter sent to CLECs. Qwest’s planned implementation date is at least 45 days from the date final specifications are provided. Qwest provides a 30-day test window prior to the release production date during which time only production support changes may be made to the

[28/](#) Technical specifications are documents that provide information CLECs need to code the interface.

specifications. Production support changes can occur during the 30-day test window without advance notification, but are posted to Qwest's website within 24 hours of the change.

e. Changes to GUI interfaces

52. For changes to GUI interfaces, at least 28 days prior notice of the planned implementation date and draft release notes is required. CLECs may provide comments on the GUI documentation not less than 25 days prior to implementation, with final notice of the release to be published at least 21 days prior to the production release date. Qwest considers CLEC comments and may address them within four days.

53. Qwest's planned implementation date is not less than 21 days from the date of the release notice. Production support changes may occur without advance notification and are posted to Qwest's website within 24 hours of the change.

9. Retirement of Existing OSS Interfaces

54. CMP procedures also cover the retirement of existing OSS interfaces. [29/](#) Retirement occurs when Qwest ceases to accept transactions using a specified OSS interface. This may include removal of a Graphical User Interface (GUI) or removal of a protocol transmission of information (application-to-application) interface.

55. For application-to-application interfaces, Qwest shares its retirement plans via its website postings and CLEC notifications provided at least nine months before the retirement date. Before retirement, the new interface must already be in a CLEC-certified production release (unless the

[29/](#) Wholesale CMP § 6.0 (Exhibit A).

old interface has not been used for the three most recent consecutive months, in which case 30 days prior notice of retirement is required).

56. The retirement notice must contain specific information, including the rationale for proposed retirement, available alternatives, a proposed detailed retirement timeline, and the targeted retirement date. CLEC comments on the Initial Retirement Notice are due to Qwest no later than 15 days following the Initial Retirement Notice. Qwest makes available to existing CLEC users of the old interface another interface with “comparable functionality” not less than six months prior to retirement. A final Retirement Notice is issued to CLECs no later than 228 days prior to retirement of the release.

57. For GUI retirements, Qwest will notify the CLECs via website postings and notifications at least two months in advance of the target retirement date. The new interface is to be in a CLEC certified production release prior to the retirement of the older interface. Alternatively, Qwest may choose to retire a GUI if there is no CLEC usage of that interface for the most recent three consecutive months. Qwest will provide 30 days notice of the retirement via web posting and CLEC notification. CLECs may provide comments to Qwest no later than 15 days following the Initial Retirement Notice. Qwest will make comparable functionality available no less than 31 days before retirement of a GUI. Qwest must issue a Final Retirement Notice no later than 21 days following the Initial Retirement Notice.

10. Meetings

58. The redesign team reached agreement on the frequency and purpose of the monthly CMP meetings, as set forth in Section 8.0 of the Wholesale CMP. There is also a provision for CLEC-initiated or Qwest-initiated ad hoc meetings. Meeting participants can choose to attend

meetings in a person or by conference call. Requirements regarding the content and distribution of the meeting materials are also addressed in Section 8.0 of the Wholesale CMP.

11. Qwest Wholesale CMP Website

59. To facilitate access to CMP documentation, Qwest maintains CMP information on its website.³⁰ The website was designed with input from the CLEC community during the redesign process, is easy to use and is regularly updated. Qwest maintains closed and old versions of documents on the website's archive page for 18 months before storing the information offline. Information that has been removed from the website can be obtained by contacting the appropriate Qwest CMP Manager.

12. Application-to-Application Interface Testing (SATE)

60. The change management redesign process has generated procedures to govern Qwest's Customer Test Environment ("CTE"). The CTE offers a CLEC several ways in which to test its transaction-based application-to-application interfaces for pre-order, order and maintenance and repair functionality with Qwest's OSS. As set forth in the Wholesale CMP ³¹, Qwest offers the following testing options for pre-ordering and ordering:

- Stand Alone Test Environment (SATE)³²
- Progression Testing in the Interoperability Environment
- Controlled Production

For maintenance and repair, the Qwest customer test environment is

- CMIP Interface Test Environment (MEDIACC).

³⁰ The URL for this website is www.qwest.com/wholesale/cmp.html.

³¹ Wholesale CMP § 10.0 (Exhibit A).

³² Qwest's SATE is being evaluated in the OSS test.

61. The CMP states that Qwest will provide the CTE for each major release and will update each CTE for any point release that has changes that were disclosed but not implemented as part of the major release. Qwest provides initial implementation testing [33/](#) and migration testing [34/](#) for all types of OSS interface change requests, controlled production for pre-ordering and ordering, and an opportunity for regression testing.

62. Qwest notifies CLECs of testing schedules so that CLECs may determine whether to participate in a test. CLECs wishing to test with Qwest must participate in at least one joint planning session to prepare for testing. As long as the CLEC uses the same software components and similar connectivity configuration as it uses in production, the Wholesale CMP provides that response times in testing generally should be similar to production. [35/](#) The Wholesale CMP also states that Qwest intends to include the service order processor (SOP) as part of the SATE component of the CTE by the end of 2002. It also provides that Qwest will make available a 30-day test window for any CLEC who desires to jointly test with Qwest prior to the Release Production Date for a major release. [36/](#)

[33/](#) Initial implementation testing is intended for those CLECs that are not currently in production or that want to test new ordering or pre-ordering transactions for which they have not been through testing.

[34/](#) Migration testing refers to testing from one version of an interface to the next version.

[35/](#) Wholesale CMP § 10.0 (Exhibit A). The CMP redesign document also notes that the CTE is not intended for volume testing. *Id.*

[36/](#) Wholesale CMP § 5.1.8 (Exhibit A).

13. Production Support

63. The CMP redesign process also produced agreed-upon language to govern Qwest's provision of support to CLECs in the production environment. ^{37/} Problems encountered by the CLEC should be reported to the IT Help Desk. Qwest will monitor, track and address troubles reported by CLECs or identified by Qwest. A week after the deployment of an IMA release into production, Qwest will host a conference call with CLECs to review problems and answer questions, following the CMP process for documenting the meeting, with issues to be addressed with specific CLECs and results/status reviewed at the next monthly CMP OSS meeting.

64. The Wholesale CMP includes detailed procedures that Qwest follows in operating its IT Wholesale Systems Help Desk (Help Desk), which answers CLEC questions regarding connectivity, outputs, and system outages; in handling trouble tickets; in grading the severity of troubles; and in addressing problems identified through trouble reports. ^{38/} If Qwest and an affected CLEC cannot reach consensus on resolution of a problem, any party may invoke the technical escalation process. The technical escalation process was reviewed with CLECs in early February 2002. ^{39/}

65. A process specification document, entitled Qwest & Competitive Local Exchange Carrier (CLEC) Escalation of Technical Issues, describing the technical escalation process is posted on Qwest's wholesale website. The process provides CLECs with a single point of contact at Qwest through which to escalate a technical issue. Pursuant to the process, a CLEC can call the Help

^{37/} Wholesale CMP § 11.0 (Exhibit A).

^{38/} See Wholesale CMP § 11.3 (Exhibit A).

Desk, which contacts the appropriate Escalation Management Contact. Within 15 minutes, that Escalation Management Contact must call the escalating CLEC. If the Escalation Management Contact and designated backup are unavailable, the issue is automatically escalated to the next higher level Escalation Management Contact. The EMC provides increased managerial visibility of the issue, suggests work-arounds, obtains reallocation of resources as appropriate, and provides a status to the escalating CLEC on at least a daily basis until the escalation is terminated. The escalation is terminated by request or closure of the associated technical issue.

66. In closing a trouble ticket, Qwest must provide one of four disposition codes: [40/](#) (1) no trouble found (in Qwest systems); [41/](#) (2) trouble to be resolved in patch; (3) CLEC should submit change request to CMP; or (4) date TBD (to be determined), if Qwest will resolve later in patch, release, or otherwise if possible when synergies exist. The CMP procedures require Qwest to track this last category and report the status and resolution of these tickets to the CMP. The CMP procedures also prescribe the contents of ticket notifications for tickets that relate to only one reporting CLEC, and “event notifications,” for trouble tickets that relate to more than one CLEC. [42/](#) Both must be sent to CLECs, within specified intervals depending upon the severity of the ticket. [43/](#)

[39/](#) Section 11.3 of the Wholesale CMP references the technical escalation process specification document. The technical escalation process through the Wholesale Systems Help Desk is a different process than the escalation process in Section 13 of the Wholesale CMP and the dispute resolution process in Section 14 of the Wholesale CMP.

[40/](#) Wholesale CMP § 11.2 (Exhibit A).

[41/](#) If it is determined that the problem resides within a CLEC’s systems, Qwest records the trouble as ‘no trouble found’ because no trouble resides within Qwest’s systems.

[42/](#) Wholesale CMP § 11.5 (Exhibit A).

[43/](#) Wholesale CMP, § 11.6, (Exhibit A).

67. The Wholesale CMP also explains how troubles are reported to Qwest’s IT organization (§ 11.4), identifies severity levels (§ 11.5), and sets forth various guidelines pertaining to trouble ticket notifications and event notifications (§ 11.6).

14. CMP Escalation and Dispute Resolution Process

68. 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 seven days if it relates to a change request; 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.

III. FCC CRITERIA FOR EVALUATING 271 APPLICATIONS

69. As defined by the FCC, “change management” refers to the “methods and procedures that the BOC employs to communicate with competing carriers regarding the performance of, and changes in the BOC’s OSS system.” [44/](#) The FCC has observed that the existence of an adequate change management process to which a BOC has adhered over time is evidence that the BOC is providing nondiscriminatory access to its OSS, [45/](#) and is offering efficient competitors a “meaningful opportunity to compete.”[46/](#)

[44/](#) *Arkansas/Missouri 271 Order*, Appendix D, ¶ 41.

[45/](#) *Arkansas/Missouri 271 Order*, Appendix D, ¶ 40.

[46/](#) *Arkansas/Missouri 271 Order*, Appendix D, ¶ 40.

70. In this section, Qwest describes the characteristics of Qwest’s change management process that demonstrate Qwest’s satisfaction of the following four factors identified by the FCC in the change management section of Appendix D of the *Arkansas/Missouri 271 Order*: ^{47/} “(1) information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) competing carriers [have] substantial input in the design and continued operation of the change management process; (3) the change management plan defines a procedure for the timely resolution of change management disputes;” and “(4) the BOC has demonstrated a pattern of compliance with [its change management plan.]” ^{48/}

A. Accessibility and Organization of Information Relating to the Change Management Process

71. Qwest provides easily accessible and well-organized information regarding its change management process. Qwest maintains a website that sets forth the current change management process, including, in part, the method for proposing and processing CLEC-originated and Qwest-originated OSS interface change requests and CLEC-originated product and process change requests. ^{49/} Those procedures are set forth in the Wholesale CMP, which, as noted above, can be

^{47/} *Arkansas/Missouri 271 Order*, Appendix D, ¶ 42.

^{48/} The remaining factors identified by the FCC as part of its change management analysis are being evaluated in the ROC OSS test. These factors are: (1) the adequacy of technical assistance provided to CLECs; (2) the availability of a stable testing environment that mirrors production (Qwest’s stand-alone testing environment or “SATE”); and (3) the efficacy of documentation for building an EDI interface. *See* *Arkansas/Missouri 271 Order*, Appendix D, ¶¶ 40-42.

^{49/} The Qwest change management website can be found at the following URL: <http://www.qwest.com/wholesale/cmp/redesign.html>.

found in an updated form on the Qwest Wholesale Website. ^{50/} As discussed above, this document contains agreements reached through extensive negotiations between the CLEC community and Qwest regarding the redesign of Qwest's change management process. Other documents containing change management procedures are also included on the website, such as the interim procedures on Qwest-initiated products and process changes, discussed above. The CLECs had substantial input, during the redesign process, into the organization and clarification of change management related materials on the website.

72. The website also serves as a repository of information that is useful to CLEC participation in the change request process. For example, change requests that are to be presented to the CLEC community for discussion and refinement at monthly CMP meetings will be posted on the website. (CLECs participating in the CMP also are notified of new change requests by e-mail.) CLEC-originated and Qwest-originated change requests are posted to the website. The change management website includes a link to a form that allows CLECs and Qwest to submit change requests to Qwest electronically. ^{51/} Qwest updates and maintains a database that tracks the progress of each change request, reports changes systematically using change request numbers, and uses these same numbers in communications with CLECs to identify specific changes.

73. The Qwest Wholesale Website also includes other information about the change management process, the redesign process, pending change requests and change management issues.

^{50/} See Wholesale CMP (Exhibit A), which can be found at the following URL <http://www.qwest.com/wholesale/cmp/whatiscmp.html>

^{51/} See Product/Process and Systems links listed under "Change Requests" link at the following URL: <http://www.qwest.com/wholesale/cmp/index.html>.

For example, the website (1) contains a listing of the change requests, their status, and a complete history of the action taken on each request, including minutes of meetings between the CLEC originator and Qwest; (2) sets forth the schedule for systems and product/process change management meetings; (3) provides a link to OSS documentation and a list of releases notifications that are related to that documentation; and (4) provides a link to the SATE Data Documents which contain SATE test case scenarios. [52/](#) It also includes the minutes from CMP meetings, past and future meeting schedules, the Release Calendar, release notifications, change requests, CMP contact information, information about how to make a change request, and more.

B. Competing carrier input into the design and continued operation of the change management process

74. CLECs have had and continue to have substantial input and opportunities for input into the design and continued operation of the change management process.

75. Qwest and the CLECs have met regularly, generally four days per month, since July 2001, to collaboratively redesign Qwest's change management procedures. The redesigned CMP has already been implemented. In sum, Qwest's current change management process provides for substantial CLEC input into both the design and the continued operation of the process. The redesign effort has provided an opportunity for CLECs and Qwest jointly to redesign the CMP by expanding its scope, developing and documenting more detailed processes, improving notification intervals, and establishing meeting standards.

[52/](#) The CMP website has links to the IMA-EDI page that specifies for CLECs how to use the EDI environment.

76. The redesign process operates on a parallel track with Qwest's ongoing change management forum. The schedules, agendas, and minutes of the CMP and CMP redesign meetings are posted on the Qwest CMP website. Qwest has regularly filed status reports on the progress of the redesign process beginning in October 2001. A number of CLECs have filed comments on the status reports, and Qwest and CLECs have participated in workshops regarding CMP related issues during the redesign process.

77. Significantly, the parties to the redesign process have already agreed that even after negotiations are completed, there will be provisions under the CMP to manage changes to the CMP. [53/](#) The parties understand that the CMP is a dynamic process that will be subject to ongoing improvements. Now and in the future, procedures are in place to ensure that CLECs will have substantial input into the design and operation of the CMP.

78. CLECs also have substantial opportunities for input into the continued operation of the change management process. As discussed above, Qwest and CLECs jointly participate in the CMP forum for managing changes related to Qwest's OSS interfaces, products, and processes that support the five categories of OSS functions (pre-ordering, ordering, provisioning, maintenance and repair, and billing). Key elements of the monthly CMP meeting were jointly developed by the CLECs and Qwest during the redesign process. These include: 1) the frequency and duration of the meeting, 2) the purpose of the meeting, 3) meeting protocol, 4) the content and distribution of meeting materials, 5) non-standard and "walk-on" agenda items, 6) the content and distribution of meeting minutes, and 7) provisions for ad hoc CMP meetings.

[53/](#) Wholesale CMP § 1.0 (Exhibit A).

79. Qwest's current change management process, which is primarily comprised of processes that were implemented as a result of the CLEC-Qwest CMP redesign effort, provides opportunities for CLEC input throughout the lifecycle of a CLEC or Qwest initiated change request. For example, the process expressly provides for CLEC input regarding CLEC or Qwest initiated change requests at clarification meetings and/or at monthly CMP meetings. Later in the process, CLEC input regarding Qwest's proposed solutions and/or draft responses is solicited at monthly CMP meetings. Additionally, for those changes that result in Product Catalog (PCAT) or technical publication (TechPub) changes, CLECs have the opportunity to provide written comments concerning the proposed changes via a web-based customer comment tool.

80. The prioritization process also provides a significant opportunity for the CLECs to have input to and control over which OSS Interface changes are implemented and when they are implemented. Additionally, Qwest's change management processes for the introduction and retirement of OSS interfaces and changes to existing OSS interfaces provide for CLEC input throughout the development lifecycle. For example, the process for changes to an existing application-to-application OSS Interface provides three distinct opportunities for CLEC input. First, CLECs may submit written questions and comments on the draft technical specifications. Second, Qwest hosts a "walk-through" which affords the opportunity for Qwest and CLEC technical subject matter experts to discuss the upcoming changes. CLECs are encouraged to invite their technical experts, systems architects, and

designers, to attend the walk through. Third, following the walk-through, the CLECs have an opportunity to submit written comments and questions to Qwest. [54/](#)

C. Procedures for the timely resolution of change management disputes

81. One factor the FCC examines in its 271 evaluation is a BOC's procedures for escalation and resolution of disputes between the CLEC and the BOC regarding OSS issues. The parties to the redesign process agreed upon escalation and dispute resolution procedures, and Qwest has implemented them. The procedures are set forth in the Wholesale CMP. [55/](#) As of March 14, 2002 the escalation procedures have been invoked on one occasion with regard to systems changes, and on four occasions with regard to product and process changes. The dispute resolution procedures have not yet been invoked as of March 14, 2002.

82. The change management escalation and dispute resolution procedures were developed jointly by Qwest and the CLECs in the redesign process. The escalation procedures apply to all items that are within the scope of the CMP, as well as to issues surrounding the CMP itself and its administration. [56/](#) The escalation procedures contain specific instructions for communicating to Qwest the escalated issue, including a statement of the CLEC's desired resolution and a request for interim action, if applicable. At the CLECs' request, the escalation process has been streamlined, and now offers CLECs a single point of contact for a given issue. The Qwest single point of contact is

[54/](#) Wholesale CMP § 5.1. As discussed above, Qwest also employs versioning for its IMA interface, meaning that it maintains a prior version of a software release for six months after implementing a new version, so that CLECs need not switch to the newer version immediately. *See Massachusetts 271 Order*, ¶ 107.

[55/](#) Wholesale CMP §§ 13.0 (escalation) and 14.0 (dispute resolution) (Exhibit A).

[56/](#) Escalations are internal, meaning that an issue is escalated within Qwest's management ranks. In contrast, dispute resolution involves external resources.

responsible for providing a final binding position regarding the escalated issue within seven days for a disputed change request and within 14 days for other escalations. Escalation requests and Qwest and CLEC responses are posted to the website.

83. A CLEC or Qwest may bypass the escalation process and immediately invoke the dispute resolution process. Like the escalation process, the CMP contains specific requirements for describing and documenting the dispute. If the parties agree, the dispute can be resolved externally through an alternative dispute resolution process; alternatively, a CLEC or Qwest may submit the issue to an appropriate regulatory agency.

84. Qwest and the CLECs have also agreed to procedures for impasse resolution that apply to the redesign effort. These impasse resolution procedures require CLECs and Qwest to negotiate in good faith and to make every attempt to reach consensus (both among the CLECs and between the CLECs and Qwest). As of March 14, 2002, only one issue has reached an impasse in the redesign process, as the parties have been successful in negotiating solutions in the framework of the redesign sessions.

85. In the event that an issue in dispute is at an impasse, then one of the following dispute resolution options is available: (1) Qwest will identify the impasse issues in its monthly CMP redesign status reports to the state commissions, and the issues can be treated as impasse issues in the Section 271 proceedings in those states; or (2) if a commission no longer accepts impasse issues in a 271 proceeding, Qwest or any CLEC may submit the issue following the procedures of the appropriate regulatory agency. Finally, if the parties agree, a third party may be hired to resolve the dispute. As of March 3, 2002, only one issue has been declared an impasse. As noted earlier, the impasse issue is

whether OBF language that treats changes to meet performance measurements as regulatory changes should be included in the Qwest CMP definition of Regulatory Changes.

86. In sum, if Qwest and the CLECs cannot reach agreement, either in the redesign process or in the change management forum itself, the escalation and dispute resolution procedures agreed to by the parties are used to resolve issues and produce a solution that Qwest and CLECs will accept and implement. Thus, even though the redesign process is not completed and has not been fully implemented yet, the procedures already in place ensure that the redesign process will conclude successfully with a collaborative result, and not one dictated by Qwest.

D. Demonstrated pattern of compliance with Qwest's change management process

87. Qwest has demonstrated a pattern of compliance with the change management process. Qwest has complied with the agreed-upon scope of the CMP. As of March 14, 2002, Qwest has only rejected one CR on the grounds that it was not within the scope of the CMP.

88. In Qwest's processing of change requests, it has met its obligations with regard to the following agreed-upon process milestones: 1) sending acknowledgements to the CR originator; 2) posting CRs to Qwest's CMP website; 3) contacting customers to schedule clarification meetings; 4) conducting meetings to clarify CLEC CRs; 5) providing initial responses to CLEC CRs; 6) posting initial responses to Qwest's CMP website; 7) presenting CRs; 8) providing final responses to CLEC CRs (if applicable); and 9) posting final responses to Qwest's CMP website (if applicable.) Between November 1, 2001 and February 2002, Qwest processed 58 new OSS Interface CRs. Of a possible 347 milestones, Qwest was responsible for missing two milestones. This equates to a 99.42% compliance rate with the CLEC/Qwest Initiated OSS Interface CR Process. During this same time, Qwest processed 32 new CLEC initiated Product and Process CRs. Of a possible 126 milestones,

Qwest was responsible for missing seven milestones. This equates to a 94.44% compliance rate with the CLEC Initiated Product and Process CR Process. Significantly, the compliance rate for this process in January and February 2002 was 100%.

89. Qwest also has met its obligations to: 1) track and document the status of change requests; 2) to hold regular CMP meetings; 3) to provide meeting materials in advance of the meetings; and 4) to record meeting discussion, action items, and issues. This information may be found at Qwest's CMP website. [57/](#)

90. In Qwest's processing of escalations, it has met its obligations with regard to the following agreed-upon process milestones: 1) acknowledging receipt of escalation; 2) posting escalation on Qwest's CMP website; 3) issuing notice to CLECs; and 4) providing Qwest's binding response. As of February 2002, Qwest processed one OSS Interface escalation and four Product/Process escalations. Of a possible 16 milestones, Qwest was responsible for missing one milestone. This equates to a 93.75% compliance rate with the Escalation Process. Qwest also met its obligations regarding the development and implementation of a web-based tool for escalation requests.

91. Qwest made a commitment to provide green highlighting of all changes published in the PCAT and to red-line all changes published in the TechPubs beginning January 2, 2002. Since then, Qwest has published 102 PCAT and ten TechPub changes. All of these documents contained the agreed-upon highlighting/red-lining web notification forms, history logs, and customer notification forms.

[57/](#) The information can be found at the following URL: www.qwest.com/wholesale/cmp/teammeetings.html.

92. Qwest has demonstrated compliance with the Prioritization Process. In August 2001, and again in October/November 2001, CLECs and Qwest jointly prioritized CLEC-Originated CRs and Qwest-Originated CRs for the IMA 10.0 Release. In February 2002, CLECs and Qwest jointly prioritized CLEC-Originated CRs, Qwest-Originated CRs, and Industry Guideline CRs for the IMA 11.0 Release. At that time, there were only nine outstanding CLEC-initiated CRs.

93. In addition to demonstrating a pattern of compliance with its change management procedures, Qwest also established a pattern of quickly implementing agreements reached in the redesign process. A matrix that shows the improvements based on various agreements reached through the redesign process and when Qwest implemented them is attached as Exhibit B.[58](#)

94. In conclusion, Qwest's change management process satisfies the FCC's requirements.

[58/](#) This matrix is also posted on the redesign website at a link entitled Change Management Process Improvements Rev. 2-15-02 at the following URL:www.qwest.com/wholesale/cmp/redesign.html.