

Qwest-CLEC Change Management Process

Concepts Agreed Upon at the March 5-7, 2002 Redesign Session In Response to ATT's Priority List

ATT presented a list of issues at the March 5 through March 7 Redesign session for the Change Management Process ("CMP") Redesign team to address. (Refer to Attachment 1: CMP Issues Priority 3.5.02 TMC final_ATT List_prioritized – 03-06-02)

The Redesign team agreed to discuss and attempt to reach consensus on a conceptual basis for each issue. The team used the following criteria to identify a value for each issue so that consensus on concept could be obtained within the next couple of redesign sessions:

- An issue with a value of "1" requires longer discussion and may potentially become an impasse issue
- An issue with a value of "0" requires some discussion and most likely would not become an impasse issue.
- An issue with a value of "X" does not require any discussion.

The team then prioritized issues valued as "1" with the most critical issue to discuss first. (See Attachment 2: Ranking of AT&T Priority List Items Identified as 1's – 03-06-02)

I. PARTIES AGREED CONCEPTUALLY ON ISSUES

A12. Qwest to propose language on the criteria used to determine method of implementing regulatory changes

Consensus on concept. The Redesign team agreed in principle to the following:

- Agreement must be reached at the monthly Systems CMP meeting by Qwest and CLECs that a change request constitutes a Regulatory change.
- The general rule is that Qwest shall implement a mechanized solution for a Regulatory change, unless all parties agree otherwise.
- At this same meeting, Qwest will propose an implementation plan for compliance and provide cost analyses. The cost analyses shall include a description of the work to be

performed and any underlying estimates Qwest has already performed for both manual and mechanized solutions.

- If one of the following exceptions applies, a Regulatory change request will be implemented by a manual solution:
 - A. The mechanized solution is not technically feasible, or
 - B. There is significant difference in the costs for the manual and mechanized solutions. The cost estimates will allow for direct comparisons between mechanized and manual solutions, using comparable methodologies and time periods.
- The parties in attendance at the CMP meeting will vote whether Exception A or B apply.
- Any party that disagrees with the majority decision may initiate the dispute resolution process under the CMP. The majority decision will apply unless the outcome of a dispute alters such decision.

A9. Provide a decision on whether to provide copies of documentation regarding prioritization and sizing. This issue includes completion of the prioritization process within CMP.

Qwest's Position: No internal documentation (e.g., methods and procedures) will be shared with CLECs regarding procedures such as prioritization and sizing.

Consensus on concept. The Redesign team agreed in principle to the prioritization process for OSS Interfaces and the Special Change Request Process (SCRP).

CLECs and Qwest may prioritize CLEC-initiated change requests. In addition, parties may prioritize Industry Guideline and Regulatory change requests if it is determined that the changes can be implemented in more than one release and still meet the mandate or recommended implementation date.

If a change request is ranked low, a party may choose to fully fund the implementation of that change by using the SCRCP. SCRCP changes will be included in the release for the affected OSS Interface.

A11. What is the status of a change when the escalation or dispute resolution is invoked? Embedded within this issue is the imbalance in treatment that CLEC CRs receive versus Qwest CRs.

Consensus on concept. The Redesign team agreed in principle to the following:

- If a CLEC invokes the dispute resolution process on a Qwest-initiated Product/Process change and requests that implementation is delayed as part of the dispute resolution process, Qwest will delay implementation for 30 days.
- A private arbitrator may be used to determine whether Qwest must delay implementation of the change pending the determination of the CLEC's request for delay as part of the dispute resolution process.
- Losing party pays the costs of the arbitrator.

CLECs asked whether an arbitrator provided by a state Commission would be considered to resolve a disputed issue. Qwest agreed to consider the issue and investigate further applicable state rules and procedures.

Potential deal breaker. CLECs are concerned that the availability of a delay in implementation is limited to Product/Process changes that Qwest is required to initiate by submitting a change request. Qwest proposed four (4) levels for a product/process change.

- Level 1 changes are defined as changes that do not alter CLEC operating procedures or are time critical corrections. No change request will be initiated.
- Level 2 changes have minimal effect on CLEC operating procedures. No change request will be initiated.
- Level 3 changes have moderate effect on CLEC operating procedures and require more lead-time before implementation than Level 2 type of changes. No change request will be initiated.
- Level 4 changes have a major effect on existing CLEC operating procedures or require the development of new procedures. A change request will be initiated.

CLECs are requesting that Levels 3 and 4 be combined and that they require Qwest to submit a change request. This issue will be resolved when the parties discuss the process for Qwest-initiated Product/Process changes.

A2. State the criteria for Deny (reasons why) for the CR process.

Consensus on concept. The Redesign team agreed in principle that Qwest may deny a CR for one or more of the following reasons:

- **Technologically not feasible**—a technical solution is not available
- **Regulatory ruling/Legal implications**—regulatory or legal reasons prohibit the change as requested, implementing the request may negatively impact a performance measurement (PID) incorporated into a performance assurance plan, or if the request benefits some CLECs and negatively impact others (parity among CLECs).

The inclusion of performance measurements need to be readdress after the impasse issue on Regulatory Change is resolved.

- **Outside the Scope of the Change Management Process**—the request is not within the scope of the Change Management Process, requests for information (as defined in the Master Red-line document)
- **Economically not feasible**—low demand, cost prohibitive to implement the request, or both.

The SCRIP may be used if a CLEC chooses to fully fund the implementation of the request.

Qwest agreed that a change request will not be denied solely on the basis that the change request involves a change to its back-end systems. Further clarification from Qwest is required for the following proposed reason for denial of a change request:

- **Qwest policy** (consensus reached to rename this category)—the procedure is working, the requested change is not beneficial.

CLECs request that this category be defined to be more objective, less subjective.

A1. Review the CR process to insure that the description of the output of each step of the process is clearly defined.

Consensus on concept. Qwest agreed to change the element from “Change Request Initiation Process” to “Change Request Process” and describe the end-to-end milestones.

II. REMAINING ISSUES VALUED AS “1” TO BE DISCUSSED AT THE NEXT REDESIGN SESSION

The remaining priority list issues that were valued as “1” will be discussed in ranking order at the March 18 and March 19 Redesign session:

Vc. What changes are CLEC-impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected?

A7. Where will a CR that impacts both an OSS interface and process be addressed—at the Systems or Product/Process CMP meeting? Embedded in this issue is Part B of ATT’s February CMP Comments: product/process must be addressed at least to the extent that there is a process to handle crossover issues.

III. Part H: The significant CMP Product/Process issues need to be resolved in order for Qwest to rely on its SGAT as support for its section 271 application. References to Qwest PCATs and Technical Publications in the SGAT cannot change the existing SGATs and interconnection agreements. However, to the extent that Qwest wishes to change the terms of the SGAT by its PCATs or Technical Publications, there must be an effective, balanced industry process that controls the changes to those product documents. CMP Product/Process is currently a “notice and go” process. Qwest tells CLECs that Qwest is changing something and then Qwest implements the change. There is only discussion after the fact. This process must be more collaborative. CLECs should have input into changes before they are implemented.

A6. What is the process to manage changes to performance reporting calculations, etc.? How do we handle the overlaps between what is being negotiated at the CMP Redesign and CPAP-like

procedures? (CMP Issues Log # 158.) This includes establishing a process connection between PIDs and CMP as described in Part F of AT&T's February CMP Comments.

A3. Determine whether a process is necessary to address non-coding changes.

Vd. What is CMP's role in rate changes or rate "validation"?

III. PRIORITY ISSUES VALUED AS "0" TO BE DISCUSSED AT THE NEXT REDESIGN SESSION

A4. What are the criteria used to determine "level of effort" (i.e., S, M, L, XL) for a release?

A5. Clarify what notices will be communicated to CLECs via email, mail-outs, communiqués, and posted on the web site.

A10. Qwest to outline what the guidelines are for when an issue is appropriate for the CMP vs. when the Account team should handle it.

Vb. Defined Terms used in the Redlined Draft CMP Document must be concluded.

Ve. What process will be used to make changes to CMP once it has been "redesigned"? By what method does Qwest propose to prove that it has actually implemented changes as it represents it has done/is doing/will do?

Vf. SGAT Section 12.2.6.

IV. PRIORITY ISSUES VALUED AS "X" DO NOT REQUIRE ANY DISCUSSION

A8. Qwest proposed re-visit Regulatory type of changes to address performance measure obligations. This impasse issue will be readdressed after a decision from the Colorado PUC.

Va. Discussion and documentation of the process for Industry Guideline changes must be completed. Qwest and CLECs are in agreement with the process for Industry Guideline changes.

V. CONCLUSION

This concludes the summary of discussions and the Redesign Team's attempt to reach consensus on a conceptual basis for issues identified by ATT as priority.

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL

Chairman

JAMES M. IRVIN

Commissioner

MARC SPITZER

Commissioner

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

)
) Docket No. T-00000A-97-0238
)
) AT&T'S LIST OF PRIORITY CMP
) ISSUES
)
)

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T") hereby file their list of priority issues regarding the Change Management Process ("CMP") of Qwest Corporation ("Qwest"). At the Arizona Workshop held on February 25, 2001, the Arizona Corporation Commission Staff requested that AT&T identify the open CMP Redesign¹ issues that must be closed prior to Qwest obtaining section 271 approval. TR. 232 (Feb. 25, 2002).

As AT&T stated in its comments filed with the Commission on February 19, 2002 ("AT&T's February CMP Comments"), there are a large number of significant issues that remain open and need to

be closed (by agreement or impasse resolution) before Qwest may be considered to meet the FCC's requirements for an effective change management process. It is very difficult to draw a line placing the necessary items "above the line" and other items "below the line." There are definitely issues that alone are significant enough that, without resolution, Qwest's CMP cannot be considered in compliance with section 271. There are other issues that *individually* may not justify a finding of non-compliance with section 271 but when considered as a group, in whole or in part, justify a finding of non-compliance with section 271.² In addition, because a good deal of work must still be done to redesign CMP, the parties have not yet identified all issues. These as yet unidentified issues may be significant as well.

The following is AT&T's attempt to identify the most critical CMP issues that must be resolved prior to finding that Qwest's CMP complies with the FCC's section 271 requirements. The following references to "Part ____" are to AT&T's February CMP Comments. For a fuller description of the issues described under the Parts, please see AT&T's February CMP Comments.

I. Part A. AT&T considers all of the issues identified in Part A of AT&T's February CMP Comments as necessary for section 271 approval.³ AT&T's attempt at prioritizing these issues follows; however, please note that many of these issues are very close in their levels of importance:

¹ SATE is not being addressed in CMP Redesign and for that reason is not cited in this summary of issues. However, SATE must meet the Federal Communication Commission's ("FCC") requirements before this component of Qwest's CMP may be evaluated favorably.

² These issues are not incorporated herein but may be found in AT&T's February CMP Comments, including the exhibits thereto.

³ Note that AT&T boiled down a twenty-three page open issues list (the CMP Issues Log) to arrive at these twelve issues. Some of these issues are further described in the CMP Gap Analysis.

A.2. State the criteria for Deny (reasons why) for the CR process. (CMP Issues Log #118; CMP Gap Analysis # 59.) 1

A.4. What are the criteria used to determine “level of effort” (*i.e.*, S, M, L, XL) for a release? (CMP Issues Log # 146.) 0

A.8. Qwest proposed to re-visit Regulatory type of changes to address performance measure obligations. (CMP Issues Log #169.) This includes the impasse issue briefed in Part D of AT&T’s February CMP Comments. X

A.12. Qwest to propose language on the criteria used to determine method of implementing regulatory changes. (CMP Issues Log # 243.) 1-3/6/02: Qwest agrees to this in concept.

A.9. Provide a decision on whether to provide copies of documentation regarding prioritization and sizing. (CMP Issues Log # 196.) This issue includes completion of the prioritization process within CMP (CMP Gap Analysis ## 117 – 120 & 124.) 1

A.7. Where will a CR that impacts both an OSS interface and process be addressed – at the Systems or Product/Process CMP Meeting? We will need to develop language to address this issue. (CMP Issues Log # 163.) Embedded in this issue is Part B of AT&T’s February CMP Comments: product/process must be addressed at least to the extent that there is a process to handle crossover issues. 1

A.6. What is the process to manage changes to performance reporting calculations, etc.? How do we handle the overlaps between what is being negotiated at the CMP Redesign

and CPAP-like procedures? (CMP Issues Log # 158.) This includes establishing a process connection between PIDs and CMP as described in Part F of AT&T's February CMP Comments. 1

A.10. Qwest to outline what the guidelines are for when an issue is appropriate for the CMP vs. when the Account team should handle it. (CMP Issues Log # 216.) 0

A.1. Review the CR process to insure that the description of the output of each step of the process is clearly defined; *i.e.*, LOE (range of hours) and affinity. (CMP Issues Log #214; CMP Gap Analysis ## 121 – 123.) 1

A.3. Determine whether a process is necessary to address non-coding changes. (CMP Issues Log #137.) 1

A.11. What is the status of a change when the escalation or dispute resolution is invoked? (CMP Issues Log # 226.) Embedded within this issue is the imbalance in treatment that CLEC CRs receive versus Qwest CRs. (CMP Gap Analysis # 20.) 1

A.5. Clarify what notices will be communicated to CLECs via email, mail-outs, communiqués, and posted on the web site. (CMP Issues Log # 156.) This also relates to CMP Gap Analysis # 101: “We continue to receive notices for scheduled system downtime on too short notice (*i.e.*, on 1/10/02 at 5:30 p.m. received notice on DLIS being down 1/12/02 all day). We have discussed in Redesign having Qwest provide these notices further in advance. We would like to receive them at least 5 business days in advance.” 0

II. Part C. The Regional Oversight Committee (“ROC”) OSS Test. The ROC test of CMP is being handled differently from the Arizona test of CMP because CGE&Y has not conducted an evaluation of the Qwest Change Management process consistent with the requirements of the Master Test Plan (“MTP”) and the Test Standards Document (“TSD”). Both Arizona and ROC tests call for the tests to be comprehensive evaluations of the CMP process that Qwest employs. CGE&Y evaluated the prior process and found it wanting in limited areas and went no further to conduct the range of tests called for by the Arizona testing requirements. The ROC tester has been diligent in its analysis of the CMP and its use by Qwest. There can be no question that the ROC test has identified a number of significant deficiencies in Qwest’s CMP. AT&T believes that resolution of the outstanding Observations and Exceptions in the ROC is required for section 271 approval chiefly because CGE&Y has not conducted the appropriate range of CMP tests called for in the MTP and the TSD. Although the ROC test is separate from the Arizona test, the Arizona Commission should take notice of the ROC Observations and Exceptions and derive the benefit from their resolution by ROC.

ROC Testing Requirements for CMP (MTP Version 5.1):

Section 23.1 Description (emphasis added)

This test *evaluates Qwest’s methods and procedures for managing changes to and change requests for OSS interfaces and business processes utilized by CLECs*. This test will review Qwest’s co-provided industry change management process (CICMP). The test will rely on inspection and review of Qwest documentation and on CLEC interviews.

23.2 Objective

The objective of this test is to determine the adequacy and completeness of procedures for developing, publicizing, conducting, and monitoring change management.

AZ Testing Requirements for CMP (MTP) Section 7.2.5 (emphasis added):

The Change Management Process Evaluation is an evaluation by the Test Administrator with involvement by Qwest, the CLECs, and the Pseudo-CLEC. The Methods and Procedures (M&P) established by Qwest will be acquired. *Qwest will be monitored and evaluated on its adherence to its published M&P for change management.* Following the collection of documentation, the Test Administrator will identify, discuss, and track available instances of specific OSS Interface new functionality, enhancements and maintenance.

The fact that the separate tests have the same fundamental requirements for the Test Administrator to conduct (italicized passages in the above), and the ROC test is yielding different results than those produced in the Arizona test, requires that the dissimilarity in results be explained.

CGE&Y's recently released Draft Final Report on the Qwest Change Management Process Redesign Evaluation Report (February 21, 2002) fails to provide answers to the issues raised in the TSD, pertinent to the redesigned process. As CGE&Y states, "This report describes the efforts CGE&Y undertook to evaluate Qwest's efforts to re-design its change management process." *CMP DFR at 3.* It does not provide information sufficient to rehabilitate the voids in the CGE&Y Draft Final Report regarding Relationship Management.

During testing CGE&Y found the CICMP to be deficient, issuing IWOs 1075, 1076, and 1078. It only concludes the process has been improved. It makes no conclusions about the adequacy of Qwest's CMP. AT&T can only conclude that the review of Qwest's CMP is incomplete and the Draft Final Report premature. *AT&T Comments on the CGE&Y Draft Final Report at 33.*

The Arizona record does not have a CGE&Y finding on the adequacy of the Qwest CMP to meet FCC requirements; and the CMP DFR does not help answer the fundamental questions. The ROC results that illuminate the process deficiencies and the breakdowns in Qwest's use of the process are more clearly stated evidence that shows the weaknesses.

It does not appear reasonable to AT&T that the Arizona Commission could find that Qwest's OSS is nondiscriminatory and provides competitive local exchange carriers ("CLECs") a meaningful opportunity to compete while ROC has open Observations and Exceptions on Qwest's CMP.

III. Part H. The significant CMP Product/Process issues need to be resolved in order for Qwest to rely on its SGAT as support for its section 271 application. References to Qwest PCATs and Technical Publications in the SGAT cannot change the existing SGATs and interconnection agreements. However, to the extent that Qwest wishes to change the terms of the SGAT by its PCATs or Technical Publications, there must be an effective, balanced industry process that controls the changes to those product documents. CMP Product/Process is currently a "notice and go" process. Qwest tells CLECs that Qwest is changing something and then Qwest implements the change. There is only discussion after the fact. This process must be more collaborative. CLECs should have input into changes before they are implemented. *See also* CMP Gap Analysis ## 20 – 22 & 114. 1

IV. Part J. Qwest must demonstrate compliance and adherence with the redesigned CMP over time. This has not been demonstrated in Arizona. AT&T is not certain how this will be satisfactorily demonstrated in Arizona, because it appears that this is not part of CGE&Y's review. Of particular concern is the FCC requirement that the CMP be used to implement "at least one significant

software release.”⁴ Qwest has not shown that it follows its CMP to implement a software release of the pre-ordering, ordering, repair & maintenance or billing interfaces.

V. Additional Significant Issues. Following are additional issues of significance that must be closed prior to a determination that Qwest’s CMP complies with the FCC’s requirements.

- a. Discussion and documentation of the process for Industry Guideline changes must be completed. (CMP Issues Log # 94.) X
- b. Defined Terms used in the Redlined Draft CMP Document must be concluded. (CMP Issues Log ## 106, 133, 141, 162, 182 & 248.) 0
- c. What changes are CLEC-impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected? (CMP Issues Log ## 110 & 179.) 1
- d. What is CMP’s role in rate changes or rate “validation”? (CMP Gap Analysis ## 1 & 2.) 1
- e. What process will be used to make changes to CMP once it has been “re-designed”? By what method does Qwest propose to prove that it has actually implemented changes as it represents it has done/is doing/will do? (CMP Gap Analysis # 103. *Also* CMP Gap Analysis # 116.) 0
- f. SGAT Section 12.2.6. (CMP Gap Analysis ## 148 & 149.) 0

VI. Conclusion. AT&T must reiterate its concerns regarding the provision of any list that selectively identifies issues raised in AT&T’s February CMP Comments that must be resolved by Qwest before a finding of section 271 compliance can be made. It is AT&T’s position that Qwest must address all the issues raised by AT&T in AT&T’s February CMP Comments. However, AT&T recognizes that the Staff intends to make a recommendation before all the issues are resolved. Because

⁴ Letter dated September 27, 1999, from Mr. Lawrence E. Strickling, Chief, Common Carrier

of this, AT&T has identified herein the issues that, at a minimum, should be addressed before any recommendation by Staff is made. Staff should also recognize that, collectively, the sheer volume of unresolved issues prevent any finding of compliance with section 271.

Respectfully submitted this 5th day of March 2002.

**AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.,
AND TCG PHOENIX**

By: _____

Richard S. Wolters

1875 Lawrence Street, Suite 1503

Denver, Colorado 80202

Telephone: (303) 298-6741

Gregory H. Hoffman

AT&T

795 Folsom St.

San Francisco, CA 94107-1243

Bureau, to Ms. Nancy E. Lubamersky, U.S. WEST.

ATTACHMENT 2

Concept Agreed to?	Issue	Allegiance	AT&T	Covad	Eschelon	Qwest	WorldCom	Total
Yes	A.12. Qwest to propose language on the criteria used to determine method of implementing regulatory changes. (CMP Issues Log # 243.)	8	2	1	4	1	2	18
Yes	A.9. Provide a decision on whether to provide copies of documentation regarding prioritization and sizing. (CMP Issues Log # 196.) This issue includes completion of the prioritization process within CMP (CMP Gap Analysis ## 117 – 120 & 124.)	9	3	3	2	2	8	27
Yes	A.11. What is the status of a change when the escalation or dispute resolution is invoked? (CMP Issues Log # 226.) Embedded within this issue is the imbalance in treatment that CLEC CRs receive versus Qwest CRs. (CMP Gap Analysis # 20.)	1	8	8	1	5	7	30
Yes	A.2. State the criteria for Deny (reasons why) for the CR process. (CMP Issues Log #118; CMP Gap Analysis # 59.)	11	1	2	5	4	9	32
Yes	A.1. Review the CR process to insure that the description of the output of each step of the process is clearly defined; i.e., LOE (range of hours) and affinity. (CMP Issues Log #214; CMP Gap Analysis ## 121 – 123.)	6	6	5	9	3	6	35
	c. What changes are CLEC-impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected? (CMP Issues Log ## 110 & 179.)	2	10	7	6	7	4	36
	A.7. Where will a CR that impacts both an OSS interface and process be addressed – at the Systems or Product/Process CMP Meeting? We will need to develop language to address this issue. (CMP Issues Log # 163.) Embedded in this issue is Part B of AT&T's February CMP Comments: product/process must be addressed at least to the extent that there is a process to handle crossover issues.	10	4	4	7	10	3	38

Concept Agreed to?	Issue	Allegiance	AT&T	Covad	Eschelon	Qwest	WorldCom	Total
III	Part H. The significant CMP Product/Process issues need to be resolved in order for Qwest to rely on its SGAT as support for its section 271 application. References to Qwest PCATs and Technical Publications in the SGAT cannot change the existing SGATs and interconnection agreements. However, to the extent that Qwest wishes to change the terms of the SGAT by its PCATs or Technical Publications, there must be an effective, balanced industry process that controls the changes to those product documents. CMP Product/Process is currently a “notice and go” process. Qwest tells CLECs that Qwest is changing something and then Qwest implements the change. There is only discussion after the fact. This process must be more collaborative. CLECs should have input into changes before they are implemented. See also CMP Gap Analysis ## 20 – 22 & 114. 1	5	9	9	11	6	1	41
A.6.	What is the process to manage changes to performance reporting calculations, etc.? How do we handle the overlaps between what is being negotiated at the CMP Redesign and CPAP-like procedures? (CMP Issues Log # 158.) This includes establishing a process connection between PIDs and CMP as described in Part F of AT&T’s February CMP Comments.	4	5	11	8	9	5	42
A.3.	Determine whether a process is necessary to address non-coding changes. (CMP Issues Log #137.)	7	7	6	10	8	10	48
d.	What is CMP’s role in rate changes or rate “validation”? (CMP Gap Analysis ## 1 & 2.)	3	11	10	3	11	11	49