

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation into  
U S WEST Communications, Inc.'s  
Compliance with § 271 of the  
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST Communications,  
Inc.'s Statement of Generally Available Terms  
Pursuant to Section 252(f) of the  
Telecommunications Act of 1996

Docket No. UT-003040

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

Qwest Corporation provides this status report regarding the meetings it has held with CLEC representatives regarding the redesign of Qwest's Change Management Process ("CMP"). As in the past, Qwest proposes that CLECs and other parties to this proceeding be given a reasonable amount of time to file comments on this report, including comments regarding impasse issues identified in the report, if any. Qwest circulated a draft of this report to the CLECs that participate in the CMP redesign

effort to allow them to comment on its content prior to filing. Qwest has incorporated many of the CLEC comments it received.

## **I Introduction and Background**

CLEC and Qwest representatives have met for more than 32 days over the past eight months to discuss every aspect of Qwest's CMP. As a result of this extensive collaboration, Qwest and the CLEC community have reached agreement on all substantive aspects of Qwest's CMP that apply to Qwest's operations support systems ("OSS" or "systems").<sup>1</sup>

In prior status reports, Qwest reported that these issues included the following:<sup>2</sup>

- **scope of CMP;**
- **escalation and dispute resolution processes for the CMP;**
- **processes for systems change requests ("CRs") submitted by CLECs;**
- **processes for product and process CRs submitted by CLECs;**
- **interim exception processing for OSS interfaces, product, and process changes;**
- **process for introduction of a new OSS interface;**
- **process for changes to existing OSS interfaces;**
- **process for retirement of an OSS interface;**
- **process for interface testing;**
- **process for CMP meetings; and**
- **production support processes, including a technical escalation process.**

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<sup>1</sup> Qwest has established a web site where it has posted the redesign meeting minutes and other materials. The web site address is [www.qwest.com/wholesale/cmp/redesign.html](http://www.qwest.com/wholesale/cmp/redesign.html). The minutes for the redesign meetings held on February 19, 2002, which are attached as Exhibit C, are currently in draft form. Once finalized, these minutes will be posted on the web site. The agreements reached are interim-draft agreements, subject to the CMP participants reviewing the final "Master Red-lined Document" and agreeing that the individual agreements on the various issues are consistent and appropriate when viewed in the context of the entire document.

<sup>2</sup> In addition, the parties have made substantial progress regarding the process for handling Qwest-initiated product/process changes, including Qwest's proposal to submit a change request ("CR") for certain types of changes. Because the parties have not yet reached agreement on this process, it has not been implemented. The parties have declared impasse regarding one issue, which relates to prioritization of regulatory changes. The issue is whether changes that are required to meet performance measurements should be included in the Regulatory Change category. Qwest submitted its position on the impasse issue to the Commission in its Report Regarding Change Management Issues filed on February 8, 2002.

**Prioritization of Systems CRs.** The parties have now reached agreement regarding the process for prioritizing systems CRs.

Qwest has agreed to allow all Regulatory, Industry Guideline, Qwest-initiated, and CLEC-initiated systems CRs to be prioritized, so long as the mandatory implementation dates for Regulatory Changes and recommended implementation dates for Industry Guideline Changes are met. No other ILEC allows CLECs to prioritize Regulatory or Industry Guideline Changes. By allowing all types of changes to be prioritized, Qwest's process provides for CLECs to influence changes that impact them and how they do business with Qwest without jeopardizing Qwest's ability to implement changes pursuant to compliance dates.

The parties also agreed in principle to a special change request process that provides a method by which a CLEC or Qwest can move a CR into a release even though it was not prioritized high enough to be included in the release. This process will allow a CLEC or Qwest to separately fund the development and implementation of changes that are very important to the initiator, but not important enough to the community to be included in a release.

**Process for Resolving Remaining Issues.** In addition, Qwest and the CLEC community agreed upon an approach for resolving the remainder of the significant CMP issues raised by the CLECs. The approach is designed to allow the parties to reach agreement in principle or impasse on the issues that the parties have identified as the most important issues by April 4, 2002. Qwest has

committed to continue holding the redesign sessions after April 4, 2002 to allow the parties to craft detailed provisions to describe their agreements and to address any other unresolved issues.<sup>3</sup>

The process the parties agreed to employ to resolve the remaining important issues is described in the Qwest-CLEC Change Management Process Concepts Agreed Upon at the March 5-7, 2002 Redesign Session in Response to AT&T's Priority List ("Agreed Concepts Report"), which was prepared by the independent facilitator for the redesign sessions. The Agreed Concepts Report is attached as Exhibit A. A summary of this process is set forth below.

The parties began with a list of the critical issues submitted by AT&T. In its List of Priority CMP Issues, filed with the Arizona Corporation Commission on March 6, 2002, AT&T identified the issues that it believes must be closed before Qwest receives section 271 approval. AT&T's list is attached as Exhibit B. The parties assigned each of the AT&T issues into one of three categories, as follows: Category 1 denotes issues that require longer discussion and may potentially become an impasse issue; Category 0 denotes issues that require some discussion and most likely would not reach impasse, and Category X denotes issues that require no further discussion (either because conceptual agreement was already reached or the issue was at impasse).<sup>4</sup> Using this process, the parties determined that there are eleven Category 1 issues, six Category 0 issues, and two Category X issues. After the March 5-7 redesign session ended, Covad and WorldCom filed comments on AT&T's list.<sup>5</sup>

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<sup>3</sup> The schedule of redesign meetings, including proposed subjects, is attached as Exhibit D.

<sup>4</sup> This process and the issues are more fully described in the Agreed Concepts Report at 1.

<sup>5</sup> See WorldCom's Comments on AT&T's List of Issues for Change Management Process and Covad Communications Company's Comments on AT&T's List of Priority CMP Issues, both of which were filed with the Arizona Corporation Commission on March 8, 2002. These comments are attached as Exhibits E and F, respectively.

Both Covad and WorldCom raised issues that have already been identified by AT&T.<sup>6</sup> Covad also raised one additional issue, relating the addition of a provision in the CMP to allow for exceptions to the standard process. Covad described this as a "non-controversial" issue that Covad believes "can be quickly and easily accomplished by the parties."<sup>7</sup>

The parties agreed to first discuss the eleven issues in Category 1, which require longer discussion and may potentially reach impasse. These issues were then prioritized, as follows. Each party ranked the issues in order of importance, and the rankings for each issue were averaged. This process produced a list of the eleven issues, ranked in descending order of importance.

The parties agreed to attempt to reach agreement in principle regarding each issue and to defer crafting detailed language until all of the Category 1 issues have been discussed. This approach will allow the parties to more efficiently identify impasse issues.

As detailed in the Agreed Concepts Report, the parties were very successful in using this approach: the parties reached consensus on all five of the eleven Category 1 issues that they discussed. The redesign team will continue to discuss the remaining issues in the redesign session that will be held March 18-19, 2002.

**II. The Agreed Process is Set Forth in the Qwest Wholesale Change Management Process Document and Posted on Qwest's Web Site**

Qwest and the CLEC community have now reached agreement on the change management process for changes to Qwest's OSS. Qwest has implemented that process and posted a document

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<sup>6</sup> WorldCom also noted that the processes must actually be implemented for CLECs to be able to assess whether Qwest is complying with the processes. *See* note 5, *supra*.

<sup>7</sup> *See* Exhibit F at 2.

describing it on Qwest's wholesale web site.<sup>8</sup> The parties have identified a single impasse issue, which was presented to the Colorado Commission on February 8, 2002.<sup>9</sup>

Qwest's CMP addresses changes to systems, products, and processes. The redesign participants have attempted to define procedures to support all of these areas, but some work remains. Although some issues may remain relating to the change management process, as it applies to Qwest's OSS, all of the major issues have been resolved. The CLEC community believes that system, product, and process changes are all important because they impact wholesale customers, rather than Qwest retail customers. As noted above, Qwest remains committed to continuing to hold redesign sessions after it receives section 271 approval and as long as necessary to resolve any remaining issues. All parties understand that the CMP is a living process that will be subject to ongoing improvements.

However, the formal redesign process should end once the collaborative body has established a viable change management process. After the redesign process ends, the intent is to have developed processes that will address any future changes that are consistent with industry standards and allows substantial CLEC input on changes to Qwest's OSS, products, and processes.

### **III. CONCLUSION**

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

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<sup>8</sup> Qwest's Wholesale Change Management Process Document, which is attached as Exhibit G, can be found at the following URL: [www.qwest.com/wholesale/cmp/whatiscmp.html](http://www.qwest.com/wholesale/cmp/whatiscmp.html).

<sup>9</sup> On March 13, 2002, the Colorado Commission orally ruled against adding the OBF language to the definition of Regulatory Changes that would treat changes required to meet performance measures as Regulatory Changes. A written order will be issued.

Respectfully submitted this 15<sup>th</sup> day of March, 2002.

QWEST CORPORATION

/Andrew D. Crain/

Lisa Anderl, WSBA #13236  
Qwest Corporation  
1600 7<sup>th</sup> Avenue, Room 3206  
Seattle, WA 98191  
Phone: (206) 345-1574

Andrew D. Crain  
Qwest Corporation  
1801 California Street, Suite 4900  
Denver, CO 80202  
Phone: (303) 672-2926

*Attorneys for Qwest Corporation*