Relevant portion of Section V., "Report on the July 30 – 31 Workshop, Report One – Operations Support Systems Related Issues," *In the Matter of Qwest Corporation's Section 271 Application*, ACC Docket No. T-00000A-97-0238, (Feb. 25, 2003).

V. OSS Related Impasse Issues and Staff Resolution

130. The following paragraphs discuss OSS related Impasse Issues and provide Staff's proposed resolutions for each.

1. SERVICE AFFECTING PERFORMANCE AND REPORTING: *See* Ex. E-A; *see also* Ex. E-1, pp. 1-2; *see, e.g.*, Tr. Vol. I, pp. 36-42, 62, 73-74, 76, 88, 94-98, 101-02, 122-23, 130-32, 137-43, 146-49, 153-67.

131. Eschelon raised twelve sub-issues of service affecting performance and reporting, all of which are covered herein. The first four issues are as follows:

a. Are customer affecting problems occurring for Off-Net orders at an unacceptable level?
b. Are those customer affecting problems adequately addressed by Qwest's performance measures and proposed measures and related performance assurance plans?

c. Are there service affecting errors and omissions (separate from service order errors) that are not being captured by the PIDs?

d. Should Qwest use and escalate from the repair interval (rather than the longer service order interval) when a service order accuracy error occurs?

A. Parties Positions

132. In the workshop, Eschelon spent considerable time discussing this issue. Eschelon pointed out that they did not believe that Qwest was reporting accurately the service being provided to them. Specifically, Eschelon expressed concern about the accuracy of PID (Qwest Service Performance Indicator Definition) OP-5 (New Service Installation Quality). Eschelon presented to the workshop its internal report card of service provided by Qwest based on its own internal information. The results presented indicated that Eschelon's internally calculated results for OP-5 were significantly different from those reported by Qwest.

133. Qwest responded to each of these issues in the Eschelon Issues-Cites to Qwest Responses Matrix sent on August 8, 2002. Qwest has provided cites to the transcript for where Qwest responded to each issue during the Supplemental Final Workshop. Qwest responded to these issues during the July 30-July 31 Workshop, stating that:

"Over the last two years, Qwest's performance has been scrutinized beyond that experienced by any other BOC. Liberty Consulting and CGE&Y audited Qwest's performance tracking and reporting processes and found them reliable, and Liberty and KPMG validated Qwest's performance results in data reconciliation. Qwest's overall commercial performance supports their conclusions; Qwest's performance meets the standards set by the PIDs. Mike Williams discussed the Qwest's overall performance during the Arizona Supplemental Final Workshop." (See Arizona Supplemental Final Workshop Transcript Volume II, pages 380-406, and specifically OP-5 see Arizona Supplemental Final Workshop Transcript Volume I, pages 47-54, 62-64 and Volume II, pages 393-398 and OP-13 see Arizona Supplemental Final Workshop Transcript Volume II, pages 386-393.)

Chris Viveros and Toni Dubuque also discussed Manual Order Processing, Service Order Accuracy and Installation Quality Measures during the Arizona Supplemental Final Workshop." (See Arizona Supplemental Final Workshop Transcript Volume I, pages 73-79, 85-86, 90-95 and 130-139. See also exhibit: Qwest-1 - HIGHLY CONFIDENTIAL Qwest Performance Results, Eschelon, July 2001-June 2002).

B. Staff Discussion and Recommendation

134. Staff is concerned about the problems pointed out by Eschelon. Eschelon is almost unique in its business plan and the services it provides. Eschelon provides a high percentage of Centrex type services and other more complex services to its customers. It utilizes Qwest UNE-Star (UNE-E) product that is unique to it and McLeod. Because of these more complex services, many of Eschelon LSR's are manually handled and are more complex than the services tested in the OSS test.

135. Because of this concern, Staff requested that CGE&Y conduct a reconciliation of reported data between Eschelon data and Qwest data for the Measurement of Installation quality (OP-5). The CGE&Y report on the OP-5 data reconciliation was submitted on October 24, 2002. Parties filed comments on the CGE&Y report on November 11, 2002.

136. The major findings from the Executive Summary are as follows:

"CGE&Y identified several issues during the comparison of the Eschelon provided data and the Qwest provided adhoc data that indicated Qwest is not calculating OP-5 in strict accordance with the PID 7.0, and moreover, the OP-5 calculation as defined in the PID is not completely representative of all troubles CLECs experience in relation to a new installation. (See Sections 2-4)

CGE&Y found that Qwest is failing to include certain eligible repeat reports, troubles reported before LMOS has been updated with the new service order information, and troubles on lines within 30 days of an inward installation but after a subsequent invalid order type in OP-5. CGE&Y also found that Qwest

inappropriately includes troubles that are not within 30 days of an inward installation because LMOS cannot differentiate between orders with or without an inward activity.

In addition, the data reconciliation uncovered inherent differences between the information captured by a CLEC and the performance data captured by Qwest that prevents the CLEC from recalculating the OP-5 PID from its own data. Specifically, trouble situations experienced by a CLEC relating to a new installation are not captured as trouble tickets readily available for inclusion into Qwest's OP-5 calculation. (See Sections 3 & 4) These situations included outages on the day of installation and incorrectly typed service orders resulting in the provision of services not per the LSR.

In addition, CGE&Y found cases of disposition discrepancies between Eschelon's data and the Qwest adhoc data. Specifically, CGE&Y identified cases where troubles appeared to be coded to the responsibility of the wrong party. CGE&Y also found troubles classified as the incorrect carrier as a result of the trouble being reported before LMOS was updated.

CGE&Y's analysis of the trouble ticket information provided by Eschelon and the Qwest adhoc data indicates that result obtained from Qwest's published performance reports for the period May 1 – June 30, 2002 of 92.17% does not reflect the true service quality per PID 7.0. In fact, CGE&Y determined the true PID 7.0 result for Eschelon for this time period was between 87.37% and 88.26%, depending on whether CGE&Y's disposition determinations are used or not. CGE&Y's results are not as low as what was reported by Eschelon for April 2002, 40.7%. CGE&Y finds that this is likely due to Eschelon not being aware of the disposition of troubles in the MTAS data and whether the lines on which the troubles occurred experienced an inward installation activity.

CGE&Y's recommended OP-5A, which counts only the first Qwest-responsible installation-related trouble and adjusted disputed dispositions indicated a 91.64% installation service quality. When the measure is expanded to include service disruptions on the day of installation and order-writing inaccuracies, service installation quality would be reduced to an estimated 87.19%, CGE&Y's proposed OP-5D. Qwest's retail results for the combined period May and June are 85.34% and adjusted to 86.84% when only service orders with inward activity are considered, as per the PID."

137. CGE&Y made the following recommendations to remedy the deficiencies discovered during the data reconciliation:

a. Of the 83 troubles coded as OP-5 eligible by either Qwest of CGE&Y, Qwest coded 61% (51) incorrectly. CGE&Y recommends that Qwest implement a process to correct the tickets coded in error prior to the release of their regulatory reports.

b. The inclusion of repeat repair reports in OP-5, does not represent subsequent installation errors, but instead reflects Qwest's failure to clear the trouble the first time. Repeat repair reports are indicative of the quality of Qwest's maintenance and repair services, and are already reflected in the MR-7 measure, "Repair Repeat Report Rate". CGE&Y recommends that Repeat Reports Should be Excluded From OP-5.
c. Disaggregation of the current OP-5 measure to include the following installation related errors: OP-5A the current PID version of OP-5-(absent repeat reports); OP-5B – service disruptions – day of installation; OP-5C – service order accuracy; and OP-5D – overall installation quality. CGE&Y recommends that OP-5D measure the total percentage of new installations without a trouble or customer affecting condition experienced within the first 30 days of installation (an aggregation of OP-5A, B, C, and D).
d. According to Qwest, it is implementing a fix to correct various LMOS restrictions that are preventing the correct assigning of the installation indicator. CGE&Y recommends that this fix be implemented immediately and audited for accuracy.
e. CGE&Y recommends that Qwest identify and tracks error conditions as the result of LMOS limitations and incorporate them to the OP-5 measure prior to the release of the regulatory reports.
f. Qwest should not consider tickets as excluded from MTAS when assigning the installation indicator to later tickets on the same line. In addition, in cases where these troubles are excluded because they were referred to another department, CGE&Y recommended that such cases be considered by the TAG for inclusion in service installation quality calculations.

138. Staff notes here that, referred to in para. 46, calculation of 87.19% does not take into account Repeat Reports which the PID does not exclude. CGE&Y, in its conclusion section, calculated the effect of Repeat Reports:

> "If installation-related troubles which are not the first Qwest-caused trouble are also included (as per PID 7.0), this result would drop to 82.82%. There is no analogous result for retail performance, therefore, no determination of parity is possible."

139. The bottom line of CGE&Y's Report is that there are many errors and omissions in Qwest reported OP-5 results as well as disagreements on what should be included per the PID definition. Because of systems limitations, it is not possible to go back and recalculate results. Therefore, Staff believes the best approach at this point is to focus on correcting the problems and clearing up the disagreements.

140. Many of the discrepancies (approximately 70%) are occurring because of legacy system limitations. In Qwest's comments on the CGE&Y report, Qwest advised as follows:

> "Since OP-5 was first developed, advancements in capabilities have made improvements possible for OP-5. Qwest is in the final steps of further improvements to its OP-5 measurement by enabling the PID's reporting process to eliminate the effects of upstream limitations in systems. With the November 2002 results (reported in December 2002), Qwest will implement a new capability to refine the identification of OP-5-qualified trouble reports and link them with specific new installation orders…"

141. Staff agrees that as it understands the system changes that Qwest is planning, that on a going forward basis that the system created discrepancies found by CGE&Y should be corrected. Staff requests that Qwest present further evidence and demonstrate that the discrepancies identified by CGE&Y will be corrected with this implementation. This evidence should include a comparison with the old method of calculating OP-5.

142. However, for the remaining approximately 30% of the discrepancies, there is considerable disagreement between Qwest and the parties on the OP-5 exclusion definitions. This is clear in the Qwest conclusion section of their comments on CGE&Y's report as follows:

> "The questions raised by CGE&Y are explained by a very few LMOS limitations that have existed since before the development of the PIDs or by misunderstandings and overreaching on CGE&Y's part. While there are misunderstandings as to specifics of what OP-5 was intended to cover, it is clearer than ever what OP-5 does and does not capture. Regardless of whether that represents what was originally intended, CGE&Y's report confirms that OP-5 currently represents *installation* quality, not ordering quality. Outside of that, almost all of what OP-5 does not capture, in terms of service order accuracy issues, are covered by Qwest's PO-20 and Service Order Accuracy – Call Center results, and will continue to be so until the parties in the LTPA collaborative agree upon other ways to do it. Qwest has constantly committed that it will measure these issues and work with the parties in LTPA in a good faith effort to achieve agreement on how to refine the approach."

143. Staff disagrees with Qwest on these issues. The OP-5 PID clearly measures ordering as well as installation quality as indicated by the purpose statement for OP-5 (AZ 271 Working PID Version 7.0, November 16, 2001) as follows from the OP-5 definition:

> "**Purpose**: Evaluates quality of ordering and installation of services, focusing on the percentage of average monthly new order installations that were free of trouble reports for thirty calendar days following installation including the

percentage of new service installations that experienced a trouble report on the installation date after the order is reported as work complete by the technician."

144. Staff also believes that the OP-5 clearly states that its purpose is to measure trouble reports. The PID defines trouble reports as:

"Customer Trouble Reports – A report that the carrier providing the underlying service opens when notified that a customer has a problem with their service. Once resolved, the disposition of the trouble is changed to closed."

145. From this, Staff concludes that OP-5 includes all customer trouble reports from the customer resulting from either being out of service or not receiving service and equipment that was ordered from the CLEC.

146. Qwest disagreement comes from dividing troubles caused by the service order process from those resulting from the installation process. For trouble reports received within 72 hours of installation, Qwest has established a process that the CLECs are requested to call the CLEC Call Center as their first course of action. If Qwest determines the trouble is caused by a service order problem (a mismatch between the LSR (Local Service Request) issued by the CLEC and the Service Order issued by Qwest) it corrects the problem by issuing a correcting service order but excludes the CLEC report from OP-5. CGE&Y recommended this problem be captured as OP-5C.

147. Staff believes the current OP-5 description is clear on this issue. The customer filed a trouble report with the CLEC claiming that a service or feature ordered had not been provided. These Customer Trouble Reports to Qwest should be counted in OP-5. The customer is not concerned that the problem was a service order problem. The customer did not get what was ordered and is calling to get it corrected. Some of these types of troubles can seriously affect service, depending on what feature was not provided.

148. The second disagreement relates to conversions from retail to CLEC service that result in Out of Service conditions on the day of the cut (usually due to disassociation of a disconnect and an inward order). Qwest claims that even though they put the end user customer out of service, the customer trouble report should be excluded because the trouble report was received before the connect order has been completed. Qwest cites a customer trouble report exclusion for service order work prior to completion of the order. This is issue is more serious than the above issue. In this case the customer has been disconnected from Qwest retail service, not been reestablished as a CLEC customer and is left without working service. It was noted by CGE&Y that some of these cases were of several hours duration.

149. Staff again believes the current PID OP-5 description provides for this to be counted as a customer trouble report and included. The exclusion Qwest cites applies to dispatched technicians establishing new service. It does not apply to conversions of existing service to a UNE-P product. This is a very serious out of service condition that

should be corrected. Staff further addresses this issue in Impasse Issue 6 and recommends a new process to prevent lengthy out of service conditions. CGE&Y recommended that these reports be included as OP-5B.

150. Staff concludes that OP-5, after planned implementation of Qwest systems changes along with the inclusion of trouble reports for LSR/SO mismatches and trouble report for outages on the date of installation, is a good measurement of New Service Installation Quality. This resolution should provide an adequate measurement so that Eschelon's concerns can be dealt with satisfactorily. In addition, by treating these errors as trouble reports, they should carry the repair interval for resolution. This should satisfy Eschelon's correction interval concern. The revised OP-5 measurement and its effectiveness will be reviewed in the first six-month PAP review.

e. Are proposed PID PO-20 and the augment to PID OP-5 adequate to capture the issues Eschelon has raised?

A. Parties Positions

151. Qwest believes that Manual Service Order Accuracy (PO-20) and what is referred to above as "the augment to OP-5", which Qwest is reporting on the page following PO-20 results in its monthly reports (beginning with July 2002 results) do capture the issues Eschelon has raised. The aspects of order accuracy that PO-20 and OP-5 do not cover is whether all the services/features ordered on the LSR were correctly transferred to the Qwest service order. This is precisely what the additional data following PO-20 in Qwest's reports provides. By capturing calls from CLECs to Qwest's ISC reporting discrepancies with what was ordered versus what was installed, this additional data covers the remaining Eschelon issues on the subject of order accuracy.

B. Staff Discussion and Recommendation

152. Staff believes that the current proposal that Qwest has made for PO-20 does not capture Eschelon's issues. Eschelon's issues are that service order accuracy should include errors in the services/features ordered on the LSR that are not correctly transferred to the Qwest service order. The proposed PO-20 does not provide for capturing these errors. Although Qwest proposed PO-20 is similar to the Service Order Accuracy measurement that other RBOCs are utilizing in using a sampling technique, it does not measure the accuracy of the service/features section of the service order as compared to the LSR. The service/feature section is the one that affects the service provided by the CLEC and is what Eschelon is concerned about.

153. Staff requests that PO-20 be modified to include measurement of whether all the services/features ordered on the LSR were correctly transferred to the Qwest service order. In addition, Staff requests that calls to the service center because of a

service order errors also be reported in PO-20 (calls resulting from customer trouble reports should be disaggregated from calls for errors identified by the CLEC through its own actions). This does not change Staffs belief, as discussed above, that trouble reports from end user customers because of Qwest errors in writing the services/features portion of the service order should be included in OP-5 as customer trouble reports. These changes to both PO-20 and OP-5 should adequately capture Eschelon's concerns. This proposal should be submitted to the Arizona TAG for CLEC input and final resolution by February 27, 2003. Qwest should be required to finalize its proposal by March 14, 2003. The revised OP-5 and PO-20 measurement and its effectiveness will be reviewed in the first six-month PAP review.

154. In summary with respect to OP-5 and PO-20, Staff recommends the following:

a. That Qwest be required to verify through a filing with the Commission within 90 days from the effective date of the Commission's Order approving this Report that its new calculation process corrects the high incidence of coding problems uncovered in the CGE&Y Report.

b. Staff recommends that Repeat Reports continue to be included in OP-5, since the parties and Qwest agreed to inclusion at the time of PID development.

c. Staff recommends OP-5 measure the total percentage of new installations without a trouble or customer affecting condition experienced with the first 30 days of installation.

In cases where troubles are excluded because they were referred to another department, Staff recommends that such cases be considered by the TAG and/or Long-Term PID Administration for inclusion in service installation quality calculations.

d. Staff recommends that PO-20 be modified as set forth above in paragraph 153.

f. Should OP-3 (Installation Commitments Met) be evaluated to determine whether it should reflect (unless adequately reflected elsewhere) that, when there is a service order error, Qwest did not meet its commitment *to provision the order as written* by the due date?

A. <u>Parties Position</u>

155. Qwest stated that the specific concerns raised recently by Eschelon in relation to OP-3 and OP-5 were addressed in the collaborative. Eschelon has advanced nothing new that was not already considered and addressed by the test.

156. Qwest also stated that the parties decided to continue to address timeliness and accuracy of service provisioning in separate measurements, as has been commonly done throughout the industry for many years. This approach avoids problems created by attempting to address multiple dimensions of provisioning in one measurement, reducing the likelihood, for example, that one variable could mask the effects of another. Accordingly, the collaborative determined to measure provisioning *timeliness* with the commitments met and installation intervals measurements (i.e., OP-3 and OP-4) and to measure provisioning *accuracy* with the new service installation quality measurement (i.e., OP-5).

157. The collaborative recognized that, in the context of the complex and dynamic environment of providing telecommunications services, it was not advisable to attempt to measure every possible dimension of service provisioning. Indeed, it would be impossible to measure every conceivable aspect of service. Instead, the parties explicitly followed a policy of measuring the most important dimensions of service. The parties considered not only a variety of proposals from the parties, including those of the Local Competition Users Group (LCUG) (a national organization of five CLECs), but also measurements used by other ILECs, with increasing emphasis on those achieving approval of their 271 applications. The parties understood – and designed into the master test plan – that aspects of service not measured by the PIDs would be addressed by the test, in its numerous scenarios and transaction types.

158. By using the production environment almost totally, the test would yield an accurate representation of Qwest's performance in the product and functional areas specified as important by the parties. In those areas, all aspects of pre-ordering, ordering, provisioning, repairing, and billing services, among other aspects, would be captured by the pseudo-CLEC and test administrator who were charged with issuing test exceptions ("IWOs" or incident work orders) whenever they encountered situations that might indicate a problem in providing CLECs nondiscriminatory access to OSS and a meaningful opportunity to compete. Thus, any aspects of service not captured by the PIDs that affect products and functionalities selected by the parties for testing would, indeed, be captured by the test.

159. Service order accuracy was one of the dimensions of service quality not directly addressed by the PIDs that would be evaluated by the test. Accordingly, during the test, if there appeared to be discrepancies between, for example, what was ordered by the pseudo-CLEC and what was provisioned by Qwest, an IWO was issued. The concept was that, where problems were found that were not addressed by PIDs, further discussion could be held as to the best way to address the matter. One option was to suggest additional PIDs. However, for service order accuracy, the test demonstrated that Qwest was able to successfully and accurately handle LSRs notwithstanding, Qwest has recently offered to report results under PO-20 to address specific questions (not test failures)

raised in the ROC 271 OSS test related to order accuracy – specifically, order fields affecting service intervals and commitments met. When parties commented on the dimension of accuracy not being measured by PIDs, Qwest provided yet additional data based on CLEC calls to call centers about order accuracy problems to demonstrate whether there was any issue with which to be concerned. The data proved that Qwest's ordering accuracy is excellent, whether looking across all orders (mechanical and manual, at better than 98-99 percent) or across only manual orders (generally better than 95%).

160. In sum, Qwest measures its provisioning timeliness and accuracy using PIDs defined by the collaborative, which evaluate timeliness and accuracy in separate measurements. With respect to ordering accuracy, although the test identified no material problems, Qwest has volunteered PO-20 to focus on questions the ROC test raised, showing that Qwest's accuracy levels are reasonable. Qwest is also providing additional data that shows remaining accuracy aspects not captured by PO-20 or OP-5 are showing excellent performance. Going forward, the focus must continue to be on those measurements that address the most important areas of service quality that are presently of concern to the parties. Measurements consistently showing satisfactory performance will be candidates for removal, while other measurements will be developed, if needed, to address any new issues that may arise. Given that, for over five years, the parties have worked collaboratively to reach this point, and that the parties are totally in agreement that such collaboration will continue, we are all assured that, as issues come and go, there will be appropriate mechanisms to address them and, when not needed further, to give way to other measurements.

A. Staff Discussion and Recommendation

161. Staff agrees with Qwest that OP-3 (Installation Commitment Met) is not the place to measure trouble reports due to service order errors by Qwest. Staff believes that this issue is resolved with Staff's resolution of OP-5 above.

g. Are the Qwest PIDs adequately capturing troubles that are reported through Qwest's documented processes when those processes, allow action other than opening a trouble ticket with the repair desk?

A. Parties Comments

162. Qwest advises that Qwest's PIDs do appropriately capture troubles that are reported through Qwest's documented process when those processes allow action other than opening a trouble ticket with the repair desk. The issue is one of performance, not one of semantics, and the performance of interest, in this instance involving "capturing troubles" is how well Qwest responds to CLEC reports of problems, when submitted through the proper channels, regardless of whether the action involves opening a "trouble ticket" with the "repair desk."

163. According to Qwest, the parties in the Arizona and ROC collaboratives extensively discussed these issues and decided how they wanted the PIDs to address such performance. Where a service is not functioning properly, after having been initially installed properly, the parties designated PIDs MR-3 through MR-9 to capture timeliness and accuracy of repairs, according to whether they were non-designed or designed services. These types of troubles involve calls to the repair center and not to the ISCs, because the services involved are not in the provisioning "window" (i.e., within 72 hours following installation), and thus are those that were working properly for some time before the trouble occurred. Therefore, the performance dimension to be captured by these measurements is the repair work done on such services when they "break" or stop working properly, either partially or completely.

164. With respect to situations involving newly-installed services, the parties revised the OP-5 definition, early on, to include both those troubles occurring in the 72-hour provisioning window mentioned earlier (reported to the ISC) and those beyond that up to 30 days following actual completion of installation work (reported to the repair center). This includes troubles reported on the same day as the installation, immediately after the technician reports the work as being complete to Qwest's systems (i.e., from the moment our systems "know" the installation is "in service").

165. Also, for LNP-related disconnects, OP-17 and MR-11 capture troubles reported both through the ISC and through the repair centers, for the performance aspects those PIDs are supposed to measure (i.e., related to "timely" and "untimely" CLEC requests for due date changes).

166. Accordingly, all types of troubles reported to Qwest in accordance with current published processes are captured appropriately by the PIDs designed to address them; and all such troubles have PIDs designed to address them in the appropriate fashion set forth by the parties in the 271 collaboratives.

B. Staff Discussion and Recommendation

167. Staff disagrees with Qwest on this point. Qwest does not include trouble reports that are caused by Qwest service order errors in OP-5. That is, if a customer reports that they either did not receive a service or have other service problems that are due to the way Qwest wrote the service order, this is not included in OP-5. Further, Qwest utilizes a 72 hour process following installation to resolve these problems. However, these trouble reports are considered service order related and are being captured by Qwest in supplemental reporting. They are not included in OP-5 as trouble reports. Staff believes, as described above, they should be counted as trouble reports in OP-5 and has recommended that Qwest include them.