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Eschelon Telecom, Inc. July 23, 2004
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**Qwest Manual Order Entry
Performance Indicator Description
Adequacy Study**



June 11, 2002

Background

During the ROC OSS test, Hewlett-Packard (HP) Consulting, acting as the Pseudo-CLEC (P-CLEC), submitted a variety of orders that resulted in manual handling by reps in Qwest's Service Centers. These manually handled orders can be grouped into three general categories: orders entered manually that are designed to be processed manually; orders entered electronically that are designed to be processed manually (non-flow through); and, orders entered electronically that are designed to flow through, but that actually fell out for manual handling.

HP Consulting noted through Observations and Exceptions that many of these manually handled orders were not correctly processed by Qwest reps. Qwest researched the orders questioned in the Observations and Exceptions, and, in many cases, represented that the rep had made an error.

The number of instances in which Qwest asserted rep error caused KPMG Consulting to write an Observation questioning whether Qwest's training of reps is effective. Qwest responded by enhancing its training materials, programs and processes, and by proposing additional performance measures that might help monitor certain aspects of manual order handling.

KPMG Consulting conducted a review of Qwest's enhanced rep training, and became satisfied that, if properly executed, the revised training regime could operate to reduce the likelihood of rep error. However, due to a decision taken by the ROC Steering Committee, no transaction retesting was performed of the changes and improvements made by Qwest. Therefore KPMG Consulting was not able to determine if the changes made by Qwest were effective in actually reducing the number of rep errors.

The ROC Steering Committee expressed a strong desire to see that adequate performance measures are in place to monitor manual order handling on a going-forward basis. Accordingly, the Steering Committee sponsored an MTP Change Request that directed KPMG Consulting to conduct this study of the adequacy of existing and proposed performance measures related to manual order handling.

Objective

The primary objective of this study is for KPMG Consulting to express a professional opinion on the adequacy of existing and proposed performance measures to monitor the effectiveness of manual order handling by Qwest. In addition, we are to propose any revisions to existing performance measures, or additional performance measures, that would strengthen the tools for monitoring manual order processing performance.

KPMG Consulting is on record as stating that, in our professional opinion, definition of performance measures is best conducted in a public forum using due process. However, we have agreed to express our professional opinion on the adequacy of performance measures in this area in order to satisfy the express

wishes of the Steering Committee. The opinions expressed herein do not constitute statements of fact, and do not carry the weight of findings such as those contained in our Final Report on the ROC OSS test.

Approach

KPMG Consulting used the following approach to accomplish the objectives of this study

- Identify the interactions and communications between Qwest and the CLEC for manually handled orders;
- Identify the aspects of those interactions and communications that would be impacted by rep errors;
- Determine what types of performance measures would reflect the impact on CLECs of errors made by reps;
- Determine whether or not existing or proposed measures cover these potential measures; and
- Determine what changes to existing measures, or additional measures, if any, might be appropriate.

In thinking about our approach, KPMG Consulting also made the determination that the primary focus of this review should be on the manual order entry aspects of the manual order process, to the exclusion of downstream activities such as provisioning that are not unique to manually handled orders.

Opinion

Below we present our professional opinion by discussing the timeliness and accuracy aspects of manual order handling. By timeliness we mean either the timely transmission of the response to the CLEC, or the timely performance of activities by Qwest. By accuracy we mean either that the response is well formed, per the business rules, with no fields or field values missing, incorrect or superfluous, or that the activity performed by Qwest was done according to specifications.

In some cases, we also comment on the minimum level of disaggregation in reporting that we deem appropriate.

Because KPMG Consulting did not conduct the Metrics Audit for the ROC OSS test, we express no opinion on whether or not existing measures, as implemented, actually accomplish their objective as stated in the PID.

Functional Acknowledgements

There are currently no performance measures for timeliness or accuracy of Functional Acknowledgements of manually submitted orders. In our opinion, it is important that a CLEC receive positive acknowledgement from Qwest of the receipt of all orders so that there is no question as to whether or not Qwest is

working the order. Important time can be lost if the order is not being processed by Qwest, and neither party is aware of that fact.

Timeliness

KPMG Consulting proposes that a benchmark standard be established that articulates the target timeframe for sending Functional Acknowledgements for manually submitted orders, and defines a percentage of manually submitted orders that must be acknowledged within the timeframe. KPMG Consulting has no specific recommendations on levels of disaggregation for the proposed measure.

Accuracy

KPMG Consulting proposes that a benchmark accuracy standard be established for Functional Acknowledgements of manually submitted orders that defines the percentage of manually submitted orders that must receive an accurate Functional Acknowledgement. KPMG Consulting has no specific recommendations on levels of disaggregation for the proposed measure.

Errors

It is important that a CLEC receive prompt notification of any errors that exist in submitted orders. It is also important that a CLEC not be told that an order is in error if it is, in fact, correct because of the potential waste of resources in erroneously investigating a non-problem, and the potential for delay that may be introduced in processing the order.

Timeliness

The existing PO3 measure seems to address the intervals associated with LSR Rejection Notices, and calls for disaggregation in reporting that includes both LSRs received manually, and those received electronically but handled manually.

KPMG Consulting has no suggested changes to either the timeliness aspects of this measure, or its levels of disaggregation.

Accuracy

There are currently no performance measures that address the accuracy of LSR Rejection Notices. KPMG Consulting proposes that a benchmark standard be established that sets forth the percentage of LSR Rejection Notices that must be accurate. We would further suggest that reporting for this measure be disaggregated to reflect the levels of performance of both manually submitted orders, and electronically submitted orders that fall out for manual handling.

FOCs

FOCs provide a CLEC with an indication that the order contains no errors, and that the order will be processed.

Timeliness

The current performance measure PO5 seems to address timeliness of FOCs. KPMG Consulting has no additional suggestions for this measure, or its levels of disaggregation.

Accuracy

Other than the fields required to match the FOC with the LSR (e.g., PON), FOCs do not contain any information of significance except for the committed due date. Therefore, KPMG Consulting does not believe that any measures for FOC accuracy are required. See our opinion below for our comments on due date issues.

Due Dates

CLECs request due dates on orders submitted to Qwest. Qwest communicates committed due dates back to CLECs in the body of FOCs, and subsequently amends those expectations, when required, through subsequent notifiers.

It is KPMG Consulting's opinion that errors made by reps in entering order information can result in orders not being fulfilled on time. At the same time, KPMG Consulting recognizes that other Qwest personnel can make errors, and that these errors may also result in the order not being fulfilled on time. Indeed, both types of errors can compound one another.

KPMG Consulting also recognizes that it is not possible for a CLEC or regulator to determine the root cause of Qwest's failure to meet the due date committed to in the FOC. Neither is it possible for a CLEC or regulator to determine, for manually handled orders, whether or not some or all of the reason for a delay was caused by a rep error.

Nevertheless, KPMG Consulting believes that monitoring due date performance by Qwest, with levels of disaggregation that reflect the previously discussed three alternative paths to manual order handling, is of utmost importance. Accordingly KPMG Consulting makes the following recommendations with respect to due dates:

Timeliness

CLECs set customer expectations for due dates based upon the dates returned by Qwest in the FOC. The timeliness of service delivery is very important if CLECs are to maintain satisfactory relationships with their customers.

OP3 (Installation Commitments Met) and OP4 (Average Installation Interval) currently measure different aspects of the timeliness of service delivery. The measures disaggregate by "product," and by dispatches within/without MSA and no dispatch. KPMG Consulting recommends that additional levels of disaggregation be reported for these two measures that reflect the following three

categories: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Accuracy

Qwest publishes a Standard Interval Guide (SIG) that helps set CLEC expectations for the intervals associated with different service delivery scenarios. In addition, CLECs can request, through pre-order queries, more specific due date availability information on a per order basis.

However, events can transpire in the normal course of business such that Qwest cannot perform at a level that is consistent with either the SIG, or the information provided in the pre-order response. In these cases, the due date returned to the CLEC may differ from both the SIG, and the pre-order query.

CLECs rely on the SIG and/or the pre-order queries to plan their business activities, and to help establish the requested due dates submitted in orders. KPMG Consulting is aware that Qwest offers these two tools only as guidelines, and further represents that the date returned in the FOC is the date that should be used by CLECs to set customer expectations.

However, KPMG Consulting is of the opinion that the relationship between the SIG/query intervals, and the actual committed to interval implied by the FOC due date, is important to monitor so that a material divergence between the two does not exist for an extended period of time.

Accordingly, KPMG Consulting proposes that a new diagnostic performance measure be established that measures the percent of FOC due dates that fall within the interval published in the SIG. KPMG Consulting recommends that the three levels of disaggregation be reported for this measure: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Another issue associated with the FOC due date is the number of times that a due date is changed by Qwest after the FOC is issued. OP15 (Number of Due Date Changes per Order) is designed to measure this, but does not include any levels of disaggregation. KPMG Consulting recommends that three levels of disaggregation be reported for this measure: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Service Order Accuracy

Many of the errors a rep can make will result in differences between what was ordered by the CLEC, and what was contained in Qwest's internal Service Orders. Therefore, KPMG Consulting recommends that a benchmark standard be established that reports the percent of Qwest Service Orders that are completely consistent with the LSR received from the CLEC, and establishes the percentage of Services Orders that must be consistent with their related LSRs.

KPMG Consulting also recommends that three levels of disaggregation be reported for this measure: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Summary

In summary, KPMG Consulting proposes the following:

- Change PIDS OP-3, OP-4 and OP-15 to add disaggregations for:
 - Manually submitted orders;
 - Electronically submitted orders that fall out; and
 - Electronic submitted orders that flow through.
- Define new PIDS for:
 - Functional Acknowledgements of manually submitted orders;
 - Accuracy of LSR Rejection Notices;
 - Conformance of FOC due dates with the SIG; and
 - Service Order Accuracy.