Data Reconciliation Update

On January 3, 2002, Liberty issued its second report on data reconciliation. That report discussed the results of reconciling data from CLECs and Qwest for the state of Colorado. As a result of the work reflected in that report, and on reconciliation efforts that used data from Arizona and Nebraska, Liberty issued one exception and ten observation reports. This report provides a summary and the status of each of the exception and observation reports. It also describes one correction and updates the status of an open issue from the Colorado report.

In summary, Liberty has identified and reported on several problems with Qwest's performance measure reporting. One-half of these issues appear to require programming changes that Qwest has indicated it has already made. The other half of these issues involves human error. Qwest has indicated that it has conducted training or taken other steps to improve human performance. Liberty has closed five of the eleven reports.

Exception 1046

Exception 1046 stated that, during the period being covered by Liberty's data reconciliation, Qwest's systems sometimes truncated the third digit of an order's missed function code while it was being transferred from the Integrated Data Repository pending data source to the Detailed Data Set used by RRS to calculate OP-15 performance measure results. The Wholesale Regulatory Reporting program looks up the code in a miss code table to determine how the order should be handled. If it fails to find the code, it defaults the miss to Qwest. Thus, all of the LIS trunk orders showing two-digit miss codes were being reported as Qwest misses, even though not all of them were.

In its response to the exception, Qwest stated that it had already identified the problem and that the programming code had been corrected in the August 2001 release of performance results. Qwest also stated that the problem affected all results produced for OP-15A and OP-15B on all designed service products for the period of January through July 2001.

Liberty issued data requests for the old and new programming code for OP-15, as well as for Qwest's documentation of how it identified the problem, developed revised business requirements, and solved the problem. Liberty reviewed the revised code for OP-15, conducted a telephone interview, and concluded that the code was no longer truncating the missed function code. Liberty also reviewed the PEND data files for the months of September through December 2001, the period after the fix was reportedly in place. Liberty confirmed that these files contained all three characters of the missed function code, *i.e.*, there was no truncation. Liberty then used the files to determine how many orders should have been included in the OP-15 measure results for these months and confirmed that the published performance reports included the same number of orders. Liberty considers this exception to be closed.

Observation 1026

Observation 1026 identified retail orders that were being included in performance reports as wholesale orders. Qwest indicated that the process of provisioning a line-sharing order involves Qwest issuing a separate retail and wholesale order. The wholesale order was being correctly included in the RRS calculations. However, because there was no retail line sharing, the second order was being defaulted into the wholesale category, resulting in a double count. Qwest implemented a code change to look for orders that contain billing USOCs with retail activity and then exclude such orders from the measure. Qwest indicated that this action prevents the reporting of retail orders as line-sharing activity. The code changes were implemented effective with the November 2001 release of performance results. Qwest indicated that the December 2001 release corrected the results for all months in 2001.

Qwest provided data files that contained the orders identified by Liberty that were affected by this observation. Liberty has reviewed these files and found that the appropriate changes had been made for orders affecting July measures onward. Also, during its re-audit of the PID 4.0 OP measures, Liberty reviewed the code that is used to identify orders with retail activity. Liberty conducted an interview with Qwest on this matter and received responses to related data requests.

Liberty found that for months before July 2001, Qwest's revised code could not correct the problem. Qwest acknowledged this in a supplemental data request response. Liberty considers this observation to be closed. To ensure that the record is clear, Qwest should supplement its observation response to clarify that only results from July 2001 and forward are free of this problem.

Observation 1027

Observation 1027 identified various orders that were included and counted in more than one month. Qwest acknowledged the problem and indicated that it occurred when an order was completed in one month and then passed through completions again in a second month. If an order was passed through with a completed status (CP) in one month and goes through a second completion as a billing post (PP) in another month then it was double counted. Qwest implemented new code that reviews the record for the previous seven months and, if the record has been previously counted, it is omitted from the current month's calculations.

AT&T filed comments on this observation noting that measures other than OP-3 and OP-4 could be affected. AT&T also questioned why this problem was apparent when earlier, in a response to the problem identified in Arizona, Qwest indicated that prior results would be re-generated with the fix in place. Qwest stated that corrected data could not be made available for the reconciliation because the problem was not yet resolved at the time Liberty was given the reconciliation data. Qwest also stated that the problem affected OP-3, OP-4, OP-5, OP-6, OP-15, PO-8 and PO-9, and all disaggregated products. Qwest provided documentation showing that the same issue that had been identified in the Arizona test had been closed.

Liberty conducted an interview with Qwest on this matter and received responses to related data requests. Liberty reviewed the data files and the revised code provided by Qwest to confirm that the problem has been resolved. Liberty considers this observation to be closed.

Observation 1028

Observation 1028 reported that there was a significant error rate (about 15 percent) in the mean-time-to-repair (MTTR), or repair duration, used by Qwest in calculating its MR-6 measure for AT&T in Nebraska. In its earlier reconciliation work, Liberty found that Qwest's overall error rate of about 3 percent in Arizona, when viewed alone, was within the range of a reasonable human error rate. However, when Arizona and Nebraska results were combined, the error rate was 6.5 percent, which in Liberty's opinion could be problematic. Liberty has therefore begun an analysis of AT&T trouble tickets in Oregon to obtain additional data on the nature and frequency of errors. Liberty has also requested information on Qwest's compliance review and coaching programs to ascertain whether such programs should be effective. This observation cannot be closed until Qwest provides the required information and Liberty has completed its analysis.

Observation 1029

Observation 1029 noted the exclusion of certain CLEC line-sharing orders because the CLEC was unknown. Qwest acknowledged that it was unable to report the majority of line-sharing orders in the months of July and going forward for certain CLECs. Qwest indicated that its order writing process did not capture the data used to identify CLECs, and thus Qwest was not able to report line-sharing results for the majority of the orders at the CLEC-specific level for this time period. Beginning with the December 2001 data and going forward, a new detail field was added to PANS that addressed this problem. Qwest indicated for the period from July through November 2001, a "work around" solution had been implemented.

AT&T filed comments on this observation noting that measures other than OP-4 could be affected. AT&T also requested that Qwest identify the specific performance measures for which CLEC-specific reporting was not available as a result of the problem identified in this observation. Qwest stated that measures OP-3, OP-4, OP-5, OP-6, OP-15, PO-8 and PO-9 were affected, but for line sharing results only. Qwest also indicated that the problem did not affect the M&R measures because the relevant information was retrieved from other sources.

Liberty has conducted an interview with Qwest on this matter and received responses to its data requests. The data responses included revised computer code, updated July RSOR data files with the "work around" solution in place, identification of other measures affected by this problem, and information on the development of the new data field. Liberty compared the original test July RSOR file sample with the corrected July RSOR data file sample and was able to confirm that the improperly excluded orders were included in the new July RSOR data set. Liberty considers this observation to be closed.

Observation 1030

Observation 1030 noted that Qwest failed to report a number of Covad Firm Order Commitment (FOC) records because the state code was not automatically logged for those transactions. Qwest acknowledged that there was a problem. However, Qwest stated that only a small percentage of the transactions were not recorded. Qwest indicated that the issue was caused by a code break in EDI 6.0 related to unbundled loop processing. Qwest indicated that customers were moved off EDI 6.0 in August and September and EDI 6.0 was retired in December 2001, so the problem for the most part had been addressed with the new technology. For those records that are not auto-logged with the new technology, Qwest will run an ad hoc report to identify them and will manually populate the state code.

AT&T commented that, since PO-2, PO-3A-1, PO-3B-1, PO-3C, and PO-4C all require state codes, it was highly likely that these results were inaccurate. AT&T also expressed concern with when the "break" occurred and whether, in months prior to July, the CLECs using EDI 6.0 had inaccurate performance results for PO-5 because of this problem. Finally, AT&T requested that Qwest's process ensure that all transactions affected by the omission of the state code were recorded.

Liberty had concerns with Qwest's *de minimus* argument because a significant percentage of Covad orders sampled were affected by having no state code, while Qwest claims that the problem affects less than 1 percent of orders. Qwest also indicated that the problem affects PO-2, PO-3, PO-4, and PO-5, and that it primarily affects unbundled loops, but also affects line sharing.

Liberty has requested additional information on the number and percentage of other performance measures affected by the code problem and the percentage of EDI 6.0 transactions. Liberty expects to be able to close this observation after reviewing that information.

Observation 1031

Observation 1031 reported that the Service Order Miss Code *(SOMC)* in the RSOR data for some orders was incorrect, leading to errors in performance measurement reporting. Liberty noted several different types of anomalies regarding the information in WFAC, the SOMC, and how they are used in performance measure reporting.

Qwest responded to this observation on January 24, 2002. Qwest stated that it had re-evaluated every AT&T LIS trunk and unbundled loop order for the reconciliation period from the states of Arizona and Nebraska and found that no LIS trunk orders evaluated by Liberty in Arizona were miscoded as customer caused misses and that only one of many unbundled loop orders evaluated by Liberty in Arizona were miscoded as customer caused misses. Qwest also stated that, in evaluating the data from the three states collectively (Arizona, Colorado and Nebraska), it found that 0.11 percent of the unbundled loop orders, and 6.12 percent of the interconnection trunk orders were miscoded as customer-caused misses. Qwest stated that it had clarified the MFC coding process documentation, conducted a review with the Network Organization to ensure that employees correctly complete the MFC field, and individually reviewed SOMC coding with each ISC representatives responsible for the coding errors identified.

Liberty discovered that it had mis-categorized one order and thus overstated the effect of this problem in the Colorado report. The correction is described in detail at the end of this report.

Liberty has not completed its review of Qwest's response to Observation 1031. Liberty has reviewed the attachments Qwest provided with its observation response and evaluated the manner in which Qwest improved its procedures and retrained its ISC representatives. Liberty will also complete its own evaluation of the LIS trunk orders from Arizona to validate Qwest's statement that none of them had been miscoded. Liberty submitted follow-up data requests on January 29, 2002, and Liberty expects to be able to close this observation after receiving and reviewing that information.

Observation 1032

Observation 1032 noted that Qwest included some orders in OP-4 that should have been excluded because the requested provisioning interval was greater than the then-current standard installation interval. Qwest's response indicated that out of a very large number of orders, Liberty found only a few PONS for which this had occurred. In fact, however, Liberty performed an analysis on only a sample of the orders and found that this improper exclusion affected over 8 percent of the sample. Liberty is now beginning its analysis of data from the state of Washington and continues to observe this problem.

Qwest indicated that it had improved its documentation in an effort to prevent this problem from recurring. Liberty requested a copy of the improved documentation. Liberty also requested that Qwest address what measures, products, time frames, and which CLECs, were affected by this type of error. Qwest has not yet replied to Liberty's data requests, which asked for a detailed explanation of Qwest's solution to the problem and support for the error rate Qwest reported as resulting from this problem. This observation cannot be closed until Qwest provides the required information and Liberty has completed its analysis.

Observation 1033

Observation 1033 stated that there were instances where Qwest personnel determined the order application date/time incorrectly for OP-4 LIS trunk performance measurement reporting purposes. In some instances, Qwest failed to change the application day to the next day, even though the ASR was received after 3:00 p.m. MT. In other cases, it appears that Qwest used the wrong application date because of uncertainty as to whether or not the application was "complete and accurate" as is required in the definition section of the PID.

In addition, Liberty determined that several Covad UBL orders in Arizona received after 7 p.m. were dated the same day, rather than the next day in accordance with the PID. This resulted from Liberty's review of the data Covad provided too late for inclusion in the Arizona report.

In its response to the observation, Qwest stated that the net effect of its errors was minimal, *i.e.*, a one day difference during the period being reconciled. Liberty believes it is pure coincidence, and irrelevant, that Qwest's errors may net out to a small number for the period. The important fact is that Qwest committed human errors in a third of the LIS trunk orders for which the parties agreed on the denominator but not the numerator.

AT&T filed comments on this observation, questioning whether other performance measures and other products could be affected by the problem, whether there could be both systems errors and human errors involved, and whether prior results could be re-stated.

Liberty is waiting for the responses to several data requests to Qwest regarding this issue. This observation cannot be closed until Qwest provides the required information and Liberty has completed its analysis.

Observation 1034

Observation 1034 identified various line sharing orders that were incorrectly excluded as loops with non-standard intervals of 72 hours. Liberty identified the problem in the Covad's Colorado

May PO-5 performance report and did not find this problem occurring in the months of June and July. Qwest in its response concurred with Liberty that a number of line sharing orders for May had been excluded from the performance report because the orders had been assigned a non-standard FOC interval of 72 hours. Qwest indicated that the problem was human error and that the exclusions of the line sharing orders were improper. Qwest stated that their processes currently dictate that the 72 hours interval should be manually selected only on specific unbundled loop products where the CLEC has a special non-standard FOC agreement. Qwest contends that this process should and did address the concerns raised in the observation.

Qwest identified for Covad's May performance report 23 line sharing orders in Arizona, 29 line sharing orders in Colorado, and 91 line sharing orders in Washington excluded because of the assignment of a non-standard interval. Qwest provided ad hoc files for each month from May through December 2001. Liberty has reviewed each month and does agree that Qwest has identified the magnitude of the problem in Arizona, Colorado, and Washington. Furthermore, Liberty confirmed that the sharing non-standard interval assignment did not occur during the months from June through December 2001.

In an interview, Qwest gave a plausible explanation for why this problem only occurred during the month of May 2001. Since Liberty has confirmed that the problem has not appeared after that month, this observation is considered closed.

Observation 1035

Observation 1035 reported that there were errors in the OP-3 and OP-4 measures prior to June 2001 because Qwest included cancelled orders in the measures. According to Qwest, the problem affected only orders coming through the SOLAR system, which processed service orders for the five eastern states (Iowa, Minnesota, Nebraska, North Dakota, and South Dakota). Qwest has indicated that the problem was resolved as of May 12, 2001, but all results prior to June 2001 for the five states were affected. Although Liberty saw no evidence of the problem in Arizona or Colorado, Liberty has not yet concluded that the problem was limited to these five states.

Qwest recently provided a response that indicated only about 2 percent of the eastern region orders were affected by this problem and that the problem did not occur after May 12, 2001. Liberty is now reviewing the information provided by Qwest.

Other Issues

Lengthy Completion Intervals

To capture the data required for completed service orders, Qwest extracts information for the current and the prior seven months. Qwest performed a test showing that this method captured 99.9 percent of the completed orders. During the data reconciliation for Colorado, Liberty found two LIS trunk orders that were not reported because they were over eight months old. Liberty was concerned that Qwest's test may not have been valid for orders that are typically more complex than average, such as those for LIS trunks. Liberty requested that Qwest conduct another test limited to LIS trunk orders to determine the percentage captured during the eight-month interval. Qwest has not yet responded to Liberty's request.

Report Correction

Liberty recently discovered that it had mis-categorized one of the LIS trunk orders about which the parties disagreed in Colorado. Liberty had categorized it as a Qwest error in assigning jeopardy codes and customer-miss exclusions, but it should have been categorized as a Qwest error because Qwest did not support the due date it believed to be correct. After issuance of the Colorado report, Qwest did provide support for the due date, and the information about this order should now be considered inconclusive because AT&T provided support for a different due date. Accordingly, the beginning of the reconciliation section of the AT&T part of the Colorado report should read:

B. Reconciliation Results

For the measure OP-3, Qwest and AT&T agreed on 47 percent of the orders. For the orders that the companies disagreed on, Liberty found that:

- ***18** percent were likely caused by Qwest's errors in assigning jeopardy codes and customer-miss exclusions. In addition, another 9 percent of the orders contained a 01/01/01 completion date, which meant that Qwest's program properly excluded the orders but that there was likely human error in failing to enter a correct completion date. (Observation 1031.)*
- *6 percent were not counted by Qwest because the order took more than eight months to complete.*
- *For 61 percent, Qwest's treatment was correct, or Qwest followed its procedures for not counting orders with a customer miss. In a quarter of these cases, the discrepancy was caused by Qwest using the reference date to report order completion. In 40 percent of these cases, the discrepancy was caused by disagreement as to when a LIS trunk order completes.*
- ***15** percent of the discrepancies contained conflicting information that Liberty was unable to resolve.*