



Test Vendor ID: OBS 3089
Qwest Internal Tracking ID: TI 835
Observation/Exception Title: KPMG / Qwest Dataset Differences
Test Type/Domain: Test 14 - POP Provisioning
Date Qwest Received: 02/11/2002
Initial Response Date: 02/25/2002
Supplemental Response Date: 03/21/2002

Test Incident Summary:

An observation has been identified as a result of the data evaluation in Test 12 and Test 14 in the MTP.

Observation:

In Test 12 and Test 14 of the MTP, KPMG Consulting is required to compare the P-CLEC data KPMG Consulting produces to the P-CLEC data Qwest produces. KPMG Consulting has found several differences between the two datasets.

Background:

In accordance with the Qwest OSS Evaluation Project Master Test Plan, KPMG Consulting must “Compare KPMG Consulting-produced HP measures to Qwest-produced HP measures to ensure there is no problem with the data being collected for test reporting purposes.”¹ In order to do this comparison, KPMG Consulting selected several data fields for the months of November and December and compared KPMG Consulting data to Qwest data.

Issue:

For some orders, it appears that KPMG Consulting’s data does not match Qwest’s data. These data discrepancies will result in differences when comparing KPMG Consulting’s view of the P-CLEC’s PID performance to Qwest’s view of the P-CLECs PID performance. In particular, KPMG Consulting has found a number of instances where the original due date and/or service order completion date do not contain the same values on the KPMG produced database as they do on the Qwest produced database. These fields are critical in the calculation of OP-3, OP-4, and OP-6. These fields are also used in other PID calculations.

KPMG Consulting will supply a separate confidential attachment showing examples of the differences in these two fields.

Question:

It is unclear to KPMG Consulting why there are discrepancies in the data. Can Qwest please review the accompanying confidential material and attempt to explain the differences in the datasets?

¹ The Regional Oversight Committee (ROC) Third Party Test, Qwest OSS Evaluation Project Master Test Plan, Final Release; Version 4; p. 51.



Qwest Formal Response:

There were two basic observations, one dealing with differences in due dates and the other with completion dates. As noted in the analysis below, Qwest is using the correct data for due dates and completion dates in the calculation of P-CLEC performance results. Qwest believes the reason for the data discrepancies noted between KPMG and Qwest data is that KPMG is not using the official performance measurement data sources for capturing the due date and completion date data.

Due Date Observations

Qwest has reviewed the Confidential Documentation provided by KPMG. From this document, it appears KPMG is comparing the column...“KPMG Original Due Date” to “Qwest Original Due Date.” Further it appears the column “KPMG Original Due Date” is based on the Desired Due Date (DDD) in the original LSR. Additionally, Qwest is unclear what data source KPMG is using to populate the field “Qwest Original Due Date.”

If KPMG is basing their original due date from the LSR DDD, KPMG should not expect the DDD to match the due date returned in the FOC and recorded in Qwest’s reporting measures. The DDD in the LSR will often match the Due Date provided in the FOC, but may also fail to match for a variety of reasons. For instance, if the CLEC requests a desired due date that falls on a holiday, or a due date that is less than the standard interval, Qwest will return a different due date in the FOC based on Qwest’s published interval guidelines.

When comparing Due Dates for measurement purposes, KPMG should be comparing the latest FOC DD related to CLEC activity with the Applicable Due Date field, “INTREVDD.” The Applicable Due Date field, INTREVDD, can be found in the RSOR Ad Hoc File provided to KPMG on the monthly data request.

The FOC DD field and the “INTREVDD” field should match. In the limited instances where these two fields do not match, the mismatch is typically due to a Qwest caused delay such as a lack of available facilities. When Qwest caused delays occur, Qwest reporting mechanisms accurately capture and account for these delays by appropriately adjusting the Applicable Due Date field, “INTERVDD,” in the RSOR Ad HOC data file. Data input errors by Qwest typists can also lead to mismatches between the FOC DD and the Applicable Due Date field. For example, the Confidential Document provided by KPMG includes several examples where the LSR submitted by the P-CLEC requested a DDD that was a shorter-than-standard interval. The Qwest typist incorrectly returned the shorter-than-standard DDD in the FOC DD field. The Qwest typist should have adjusted the due date to comport with the standard interval and returned the adjusted due date in the FOC. As described in Observation 3086, Qwest has enhanced its service quality control process to address and minimize these types of errors.

Completion Date Observations

KPMG also provided orders where KPMG states that the completion date shown in KPMG’s data does not match the completion date reflected in Qwest’s Ad Hoc data. It appears, however, that KPMG may not have been able to match this data because it was comparing the wrong data points on both sides of this equation.

First, it appears that KPMG populated the “service order completion” entries in its confidential spreadsheet (column 3 in the table below) with the date that the IMA completion notice was sent to the CLEC (column 4 in the table below).

It is not the date that the IMA completion notice is sent (column 4 in the table below), but rather, the completion date reflected on the IMA completion notice (column 5 in the table below) that represents the order completion date. It is this data point—the completion date shown on the IMA Completion Notice—that should match the completion date shown in Qwest’s Ad Hoc data.



In addition, it also appears that KPMG was not using the correct data point from Qwest’s Ad Hoc report to compare against. Qwest is not certain what data point KPMG used to populate the “Qwest Completion Date” (column 6 in the table below) in its confidential information. The appropriate date point is the INTACTDD field from Qwest’s Ad Hoc report (column 7 in the table below). As stated in Qwest Technical Documentation, when computing OP-3, OP-4 and OP-6, Qwest uses the value in the INTACTDD field for completion dates. The INTACTDD field (column 7) and the Completion Date on the IMA Notice (column 5) match, as shown in the table below with one exception.

The table does show a single discrepancy in these two columns for **Redacted**, due to a data entry error on the completion notice. This data entry error did not impact the correct reporting of this order in OP-3, OP-4 and OP-6.

PON	Qwest Order Number	KPMG Completion Date	IMA Completion Notice Sent	Completion date on IMA Notice	KPMG Stated Qwest Completion Date	INTACTDD (Qwest completion date for PID calculation)
Redacted	Redacted	03-Jan-02	1/3/02 1:12pm	3 January 02	14-Dec-01	14-Dec-01
Redacted	Redacted	26-Dec-01	12/26/01 2:06pm	26-Dec-01	01-Jan-01	26-Dec-01
Redacted	Redacted	26-Dec-01	12/26/01 1:53pm	26-Dec-01	01-Jan-01	26-Dec-01
Redacted	Redacted	26-Dec-01	12/26/01 2:13pm	26-Dec-01	01-Jan-01	26-Dec-01
Redacted	Redacted	26-Dec-01	12/26/01 1:53pm	26-Dec-01	01-Jan-01	26-Dec-01
Redacted	Redacted	19-Nov-01	11/19/01 4:22pm	16-Nov-01	16-Nov-01	16-Nov-01
Redacted	Redacted	05-Dec-01	12/5/01 3:23pm	21-Nov-01	21-Nov-01	21-Nov-01

KPMG Comments (03/04/2002):

Contrary to Qwest’s assumption, KPMG Consulting is not using the Desired Due Date (DDD) data to populate the KPMG Original Due Date column. Instead, the original due date is extracted from the DD field in the FOC.

The data in the Qwest Original Due Date is populated from RSOR data using the field SODD, which is provided to KPMG Consulting by Qwest on a monthly basis. According to Qwest’s documentation in RRS, this is the original due date.

Qwest refers to fields called “INTREVDD” and “INTERVDD”. KPMG Consulting found no field called INTERVDD, and assumes this is a typo on Qwest’s part. The field INTREVDD was found in the most recent version of the RRS documentation, and it is labeled as the integrated revised due date. Is SODD no longer used? If so, when did Qwest begin using INTREVDD in lieu of SODD? Additionally, has Qwest updated its documentation to reflect this change in the data sets? RRS refers to an IRD process, but KPMG Consulting has not received any documentation of this process.

Qwest describes the following issue with respect to FOC DD: “Data input errors by Qwest typists can also lead to mismatches between the FOC DD and the Applicable Due Date field. For example, the Confidential Document provided by KPMG includes several examples where the LSR submitted by the P-CLEC requested a DDD that was a shorter-than-standard interval. The Qwest typist incorrectly returned the shorter-than-standard DDD in the FOC DD field.” This problem seems to be different from a simple typographical error. In this case the Qwest typist is confirming back to the P-CLEC the due date that the P-CLEC requested regardless of the fact that it may have been a date that is shorter than the standard interval. KPMG Consulting is concerned that this process is manual and is prone to these types of errors. Is there an effort to automate this process?



With respect to completions, KPMG Consulting uses the completion date reflected on the IMA completion notice to populate the completion date field. The date is extracted from the CD field in the SOC.

KPMG Consulting used the data in the SOCD field from the RSOR Ad HOC data to populate the Qwest Completion Date field. The most recent RRS documentation references an INTACTDD field as the integrated completion date. This is a change from the prior version, and is apparently part of the IDR process. Once again, KPMG Consulting has received no documentation concerning this new process, and thus we do not know how to correctly analyze the PIDs using this process. KPMG Consulting needs to know when Qwest began using the INTACTDD field instead of SOCD. Also, it appears there are still three remaining differences between KPMG Consulting and Qwest completion date data. Can Qwest help explain these?

Finally, Qwest has again indicated that the data discrepancies are sometimes caused by “data input errors by Qwest typists”. KPMG Consulting will conduct a retest analysis of the January PID retest data to determine if the enhanced service quality control process cited in observation 3086 is addressing these issues. Also, KPMG Consulting requests documentation relating to the IDR process and any other updates to the PID calculation that need to be considered when analyzing January 2002 data.

KPMG Consulting recommends that this observation remain open pending the clarification of the open issues mentioned in its response and pending the results of the January data comparison.

Qwest Response to KPMG Comments (03/21/2002):

There are 3 areas of inquiry in KPMG’s March 4th Response. Qwest will address each area specifically below:

IRD process and use of the “INTREVDD” and “INTACTDD” fields

KPMG posed several questions about use of different fields in the Qwest Ad HOC dataset for calculating performance as well as IRD process documentation. As Qwest communicated on a Focused O&E call, these processes were implemented with the adoption of PID 4.0. Qwest believes these issues were resolved on the O&E call.

3 remaining discrepancies on Completion Date

KPMG requested Qwest help explain 3 remaining discrepancies. However, Qwest does not believe there are 3 remaining discrepancies. Based on the clarification provided on the Focused O&E call and per our original response, the completion date sent on the IMA notice matched the completion date used in the Ad HOC with the exception of one date entry error on a completion notice. Qwest believes the clarification provided during the Focused O&E also resolves this question.

Discrepancies on FOC Due Date (DD)

KPMG expressed concern about discrepancies attributed to human error. In further research of root causes, Qwest has determined that there are 2 distinct categories of products that must be addressed when discussing the relationship between the FOC DD and the date used to calculate performance results. The first category includes digital loops and LIS trunks (for ease of reference, called “extended FOCs”). The second category includes all remaining products (referred to as “standard FOCs”). Each category is discussed separately below.

Extended FOCs

While it is appropriate to expect the FOC DD to be the measured date for Qwest’s performance on these products, there are circumstances that Qwest believes warrant different treatment. Specifically, as a result of the collaborative efforts of Qwest and CLECs to make the FOC more meaningful, Qwest performs certain provisioning tasks before issuing the FOC. The process



improvement has caused a slight inconsistency between the intent of the OP measures and the Due Date definition in the Definition of Terms contained within the PID.

If Qwest were to measure on time performance strictly based on the FOC DD, in scenarios where Qwest identifies a facility delay prior to issuing the FOC, that delay would not be captured in OP-6 nor would Qwest report a miss in OP-3. Qwest does not believe this was the intent of the due date definition; but rather an oversight when expanding the PID to accommodate the extended FOC process.

Qwest will propose a clarification to the definition of terms for ROC TAG consideration in order to resolve this conflict. Qwest will continue to report orders that fall into this scenario as misses and count the days delayed even though the FOC DD was met.

Standard FOCs

In the case of standard FOC products, the FOC is not delayed. Qwest determines the due date, based on CLEC DDD, standard interval and outside dispatch appointment scheduling, where appropriate. That due date is entered on the service order and the FOC without delay.

As a result of the process, there is an extremely high correlation between the due date placed on the service order and the due date reported on the FOC. However, human error can and will occur. Although Qwest is investigating possible enhancements to mechanization, Qwest believes the ongoing quality reviews performed by center coaches has resulted in increasing the level of accuracy and reducing human error to a reasonable rate.

Qwest has performed a 50% random sampling of December 2001 and January 2002 OP-3 records for standard FOC products. The sampling compared the service order due date to the FOC due date. The results for December, reflect a 94.9% match. For January the dates matched 97.6% of the time. Further, the service center's staff support organization recently conducted process reviews on orders processed the last 2 weeks in February (for products provisioned using the designed flow) as well as the first full week in March (for products provisioned using the non-designed flow). The results, albeit based on weeks of performance, reflect accuracy at levels consistent with the January study.

In conclusion, Qwest believes the occurrence of human error when reporting the FOC DD has continued to decrease and is within a zone of reasonableness when recognizing not all requests can be processed without human intervention. Therefore, Qwest requests KPMG re-analyze the results using the February data recently made available.

Attachment(s): None