

Qwest Change Management Process Issues

Note: The Qwest Change Management Process (CMP) is undergoing redesign through discussions with CLECs. This commenced in July 2001 and continues. Meetings are scheduled through June 2002 and may continue past that date. Many of the issues described below are part of the redesign discussions.

There are four major issues that have been raised through the Arizona and ROC 3rd Party OSS Tests:

- a) The CMP is deficient (generally, these findings pre-date Qwest's re-design process.) Nevertheless, these findings ratify the position of the CLECs that the process requires significant revamping to afford CLECs access to a fair and viable CMP.
- b) Qwest fails to adhere to the practices and procedures documented in its CMP
- c) CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed
- d) The CMP does not address issues reasonably defined as CMP issues

These issues are grouped in the tables below (to keep this relatively brief, in several cases the statements of the Testing Issue or Qwest Response were summarized. For their full statements, please refer to the IWO, Exception or Observation identified):

- IWO** -- Incident Work Orders identified in the Arizona test
E -- Exceptions identified in the ROC test
O -- Observations identified in the ROC test

- A.** The CMP is deficient (generally, these findings pre-date Qwest's re-design process.) Nevertheless, these findings ratify the position of the CLECs that the process requires significant revamping to afford CLECs access to a fair and viable CMP.
 IWO1076
 IWO1078
- B.** Qwest fails to adhere to the practices and procedures documented in its CMP
 Exception 2003 Exception 3110
 Exception 3094 Observation 3066
- C.** CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed
 Exception 3093 Exception 3111 (previously tracked as Observation3067)
 Exception 3102
- D.** The CMP does not address issues reasonably defined as CMP issues
 IWO 1075
 Exception 3112 Observation 3052

	a). The CMP is deficient		
IWO1076	The CMP is inefficient as too much time elapses between initiation and implementation of CLEC Change Requests		
4/8/02 status update	ACC Staff required CGE&Y to conduct an evaluation of the Qwest Change Management Process Redesign. The CGE&Y evaluation report is the subject of workshops scheduled for April 17-19, 2002.		
	Testing Issue:	Qwest Response	AT&T Comments
	<p>The Change Request (CR) process used in the CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion.</p> <p>Despite the application of fairly conservative time intervals to individual steps of the CR process, the length of time it takes an average CR to make it through the process, not even taking into account making it into a release, is simply too long. If the length of time it takes a CR to actually make it into a release is taken into account, the length of time can double or even triple.</p>	<p>10/25/01 - The Change Request (CR) Processes used in the Change Management Process (CMP) have been reviewed, re-designed, and implemented.</p> <p>Qwest implemented the following measures to improve the timeliness and accuracy of the CR Process:</p> <p>Project Managers were added to Qwest's CMP Staff to ensure the timely resolution of CRs and action items.</p> <p>Qwest Subject Matter Experts (SMEs) now conduct a Clarification Meeting with the CLEC originator of a CR prior to the first CMP Monthly Meeting following receipt of a CR.</p> <p>*****</p> <p>A database was developed to track CR status. A report that captures all of this information is provided on the web for the CLECs.</p>	<p>AT&T remains concerned about the overall time it takes for CRs to go through the process to implementation. CLECs requested that Qwest provide and overall timeline to discuss this issue. That discussion has not taken place yet.</p> <p>CMP Redesign is far from complete. The parties have a twenty page open issues list and meetings currently scheduled through April 2002 for redesign.</p> <p>Qwest states that the Interim Qwest Product and Process Change Request Initiation Process was agreed to and that Qwest implemented this process by November 15, 2001. Qwest has <i>not</i> implemented this process as agreed to with CLECs. CLECs continue to wait for Qwest to full and properly implement this process.</p> <p>Improving the timely flow of Change Requests from initiation to implementation is critical.</p>
IWO1078	CLECs do not receive Qwest specifications in time to conduct analysis, perform programming, conduct testing, and implement system changes. The CMP needs to provide orderly flow of information for timely implementation.		
4/8/02 status	ACC Staff required CGE&Y to conduct an evaluation of the Qwest Change Management Process Redesign. The CGE&Y evaluation report is the subject of workshops scheduled for April 17-19, 2002.		

a). The CMP is deficient

update			
	Testing Issue:	Qwest Response	AT&T Comments
	<p>“Final” EDI design documents are only released to the CLECs three weeks prior to a new EDI release. This issue has been repeatedly brought up at CICMP meetings by both the CLECs and third party EDI software vendors.</p> <p>The existence of stable, unchanging requirements is an absolute pre-requisite to CLECs being able to code their own systems to match Qwest’s. The lack of a true “requirements freeze” a sufficient time prior to production release, coupled with the lack of a true EDI testing environment, make it difficult for CLECs to successfully code their systems and do true user acceptance testing.</p>	<p>10/25/01 - As part of the Change Management Process (CMP) re-design, Qwest has proposed to implement the following schedule effective with the IMA 10.0 Release. This schedule meets or exceeds the national industry standards as prescribed in OBF Issue 2233.</p> <p>Qwest will provide a 12-month view of its OSS Interface Development Schedule.</p> <p>Qwest will provide draft technical specifications at least 73 calendar days prior to implementing the release unless the Exception Process has been invoked. Technical specifications are documents that provide information the CLECs need to code the interface.</p> <p>CLECs have 15 calendar days from the initial publication of the draft technical specifications to provide written comments/questions regarding the documentation.</p> <p>Qwest will sponsor a walkthrough for the CLECs beginning 68 calendar days prior to implementation.</p>	<p>While CLECs and Qwest have agreed to language for the process to make changes to interfaces, we have not seen this process implemented. IMA 10.0 will not go into production until June 2002. As a result, we are still six months out and there are steps in this process that need to be completed to insure that Qwest implements it as agreed and meets the expectations of the parties.</p> <p>For example, one problem has been the time by which Qwest provides CLECs with sufficient information (specifications, EDI mapping, etc.) to enable CLECs to code. Qwest has agreed to provide such draft information 73 days in advance of the production date and final technical specifications 45 days in advance of the production date. Until Qwest actually goes through these steps, we cannot be certain about what Qwest will provide and whether it actually addresses the concerns previously raised.</p>

b). Qwest fails to adhere to the practices and procedures documented in its CMP			
E 2003	Release notification procedures are not followed; complete and accurate notifications are required		
	Testing Issue:	Qwest Response	AT&T Comments
	<p>Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases.</p> <p>5/14/01 – The P-CLEC outlined many problems it had with the release of IMA 6.0.</p> <p>12/21/01 – HP (the P-CLEC) recommends keeping the exception open pending the successful implementation of the changed CICMP process.</p>	<p>June 28, 2001 – Qwest proposes to address this issue in the redesign of CMP and outlines its proposal to change its CMP to meet evolving industry directions.</p> <p>12/21/01 Qwest points to the CMP Redesign (document and ongoing negotiations) to respond to HP questions about:</p> <ul style="list-style-type: none"> (i) the impact that changes to published target release dates have on CLECs’ ability to plan for a new release on a shortened timeframe; (ii) requirements for re-certification notice to co-providers that re-certification and migration plans need to be developed, including timeframe and content; (iii) issues with regard to the multiple releases of disclosure document addenda and release notification release; (iv) deficiencies in Qwest’s release change management process related to Qwest’s release of addenda to its documentation. 	<p>Topics relating to this issue have been discussed in CMP redesign between Qwest and CLECs. More have yet to be discussed.</p> <p>However, the core of this issue is about Qwest performing in a manner that is inconsistent with the written process it has agree to follow.</p> <p>The redesign of CMP will not resolve this problem. By this exception, it is clear that Qwest has not followed the process it had in place prior to CMP Redesign.</p> <p>The only way to know if Qwest adheres to the redesign process is to continue to have the kind of review HP and KPMG have been conducting to observe Qwest’s implementation of the redesigned process.</p>
4/8/02 Status Update	HP accepted Qwest’s explanation regarding its commitments for CMP and for actively engaging the co-provider community in the process. HP also found that the discussions held in the CMP redesign meetings show that Qwest has actively engaged the CLEC community in addressing the issues raised in the Exception.		
E 3094	Qwest did not provide notification about a proposed change; failed to provide adequate opportunity for CLEC input; ignored CLEC input; and did not update CR documentation.		
	Testing Issue:	Qwest Response	AT&T Comments
	Qwest did not adhere to its established change management process for notifying CLECs about a proposed change, and allowing input from all	12/21/01 - This Exception is premised on KPMG's statement that "Qwest did not adhere to its established change management process for notifying CLECs about proposed changes" in processing the CR at issue. KPMG appears to assume that the process that applies to this CR is the <i>Interim</i>	This Exception demonstrates that there has been confusion in the implementation of some of the changes resulting from the CMP Redesign. If it is difficult for Qwest to know which process applies to a

b). Qwest fails to adhere to the practices and procedures documented in its CMP

<p>interested parties.</p> <p>Qwest did not adhere to its established change management process for notifying CLECs about proposed changes, and allowing input from all interested parties. In this instance, Qwest's failure to conduct thorough research prior to CR initiation necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for proposed changes. Any changes that are implemented without close examination by all interested parties may override Qwest's prior agreed upon service obligations to CLECs.</p>	<p>Qwest Initiated Product/Process Change Request Initiation Process that was developed in the CMP Redesign Sessions.</p> <p>At the time Qwest issued this CR, Qwest believed that this interim process might apply to the testing process clarification and, therefore, in good faith, submitted a CR. However, there was confusion between Qwest and the CLECs regarding the applicability of that interim process. The CLECs subsequently clarified at the December 10-11, 2001 redesign session that they never intended for that interim process to only apply to anything except changes that arose from 271 workshops or OSS testing. The interim process, as clarified by the CLECs and agreed to by Qwest, currently calls for Qwest to initiate CRs <i>only</i> for changes that alter CLEC operating procedures (as determined by Qwest), and that are made as a result of third party test or a 271 Workshop.</p> <p>Qwest then responded to each of the points raised by KPMG. By way of summary, these responses state that Qwest submitted a CR in good faith, that it conducted several meetings with CLECs, that the CR is being escalated by CLECs, that Qwest updates its CMP database statuses on an "every third day basis" and that the CR did not include a rate change.</p>	<p>given situation, imagine how difficult it is with multiple CLECs trying to use the process. By stating that the interim process does not apply, Qwest concedes that it is applying the old process. This points to the problems that arise with CMP moving from an existing process to a redesigned process.</p> <p>This exception illustrates a serious problem that currently exists in CMP.</p> <ul style="list-style-type: none"> • When Qwest initiates a CR, it goes through to implementation over the objections of CLECs. • CLECs' only recourse is escalation or dispute resolution. • However, if a CLEC initiates a CR, it will not get implemented unless Qwest agrees. <p>If Qwest does not agree, CLECs need to escalate or pursue dispute resolution. CLEC CRs do not have the same opportunity to succeed through CMP as Qwest CRs. CLECs should have an equal right to deny/reject Qwest CRs and let Qwest go through the dispute resolution process (since escalation is all within Qwest, one would expect escalation to yield the result Qwest wants).</p> <p>The CR that is the subject of this exception is being escalated by certain CLECs.</p>
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	b). Qwest fails to adhere to the practices and procedures documented in its CMP		
4/8/02 status update	Qwest has requested that KPMG Consulting conduct no further testing. Since the ad hoc process is not final and third party testing is concluding, KPMG was unable to conduct retesting to ensure that a complete and functioning Product/Process CMP was in place.		
E3110	Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.		
	Testing Issue:	Qwest Response	AT&T Comments
	Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System. KPMG Consulting reviewed a total of 115 CLEC notifications that Qwest distributed through the Mailout Notification System in December 2001, and identified the following six issues: <ol style="list-style-type: none"> 1. Delayed distribution 2. Erroneous topic 3. Late notice of system changes 4. Inadequate interval for planned outage notices 5. Inadequate information 6. Lack of adequate tracking and verification 	Qwest's response is due 2/14/02 (not received.)	AT&T's experience in receiving timely and accurate notifications from Qwest regarding all manner of system events corresponds to those observed by KPMG. KPMG notes in the Exception the magnitude of the mailouts CLECs receive: "KPMG Consulting received a total of 119 Qwest mailout notifications in December 2001." When these are issued with incorrect titles, are issued late or with such short notice that AT&T cannot make alternate plans for use of the systems and interfaces, the notifications are extremely disruptive.
4/8/02	Summary of KPMG Consulting's Retest Results:		

b). Qwest fails to adhere to the practices and procedures documented in its CMP

<p>status update</p>	<p>KPMG Consulting reviewed a total of 278 notifications that Qwest distributed between February 1, 2002 and March 22, 2002 and identified one incident in which Qwest experienced a delay of two days between the time the document was prepared and actual distribution. Among the reviewed notifications, KPMG Consulting identified three planned outage notices, all of which met the advanced notice interval requirement. KPMG Consulting was satisfied with retest results and considered issues (1) and (4) resolved.</p> <p>KPMG Consulting received a corrected notification shortly after Qwest had distributed the inaccurately titled notification in issue (2). KPMG Consulting recognizes that Qwest employed an ad hoc process to address such anticipated errors, and considers issue (2) resolved.</p> <p>KPMG Consulting observed that Qwest notified CLECs on March 1, 2002 about restructured rates for Washington State. It appeared that Qwest had implemented a notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes. KPMG Consulting subsequently closed issue (5).</p> <p><i>Issue #6 Lack of Adequate Tracking and Verification</i></p> <p>During the O/E Focus Call on March 21, 2002, Qwest confirmed that CMP managers do not employ a centralized mechanism to track and ensure that documentation release intervals are being followed for all upcoming software releases. KPMG Consulting reviewed Qwest internal process documents and verified that software and product/process documentation teams have procedures to prepare documents and distribute them in accordance with the intervals specified in the <i>Master Redlined CLEC-Qwest CMP Redesign Framework</i>. Due to the recent implementation of these process changes, KPMG Consulting has not been able to observe adherence to the documented process for notification interval management. Since Qwest has requested that KPMG Consulting conduct no further testing, KPMG Consulting will not be able to determine if Qwest's documented processes provide the ability to perform adequate tracking or verification for adherence to the documentation release intervals.</p> <p>KPMG Consulting recommends that Exception 3110 be closed as inconclusive.</p>		
<p>O 3066</p>	<p>Minor changes that do not impact CLEC operations can be made without notice through the CMP; all others must be implemented through CMP</p>		
	<p>Testing Issue:</p> <p>Qwest does not consistently employ the defined Change Management Process (CMP) to exclude CLEC-impacting system changes from point release versions of the Interconnect Mediated Access</p>	<p>Qwest Response</p> <p>12/20/01 - Qwest and the CLECs have already reached interim agreements on numerous processes associated with CLEC-impacting systems changes including those related to point releases. These agreements are documented and include:</p> <ul style="list-style-type: none"> • CR origination processes for Qwest and CLEC OSS Interface CRs 	<p>AT&T Comments</p> <p>The problem arises when Qwest initiates a change that does not go through the CR process but has an impact on CLECs. This has happened many times and it is not clear that Qwest has a handle on what changes will have an impact on a CLEC's ability to conduct business.</p>

b). Qwest fails to adhere to the practices and procedures documented in its CMP

<p>(IMA) interface.</p> <p>The absence of a defined process for identifying CLEC-impacting changes, combined with inconsistent use of the documented CMP process, makes it difficult for CLECs to prepare for and respond to Qwest point releases.</p> <p>This exposes CLECs to unnecessary risks from changes that could impact their business operations and service to end-use customers.</p>	<p>Interface CRs</p> <ul style="list-style-type: none"> • Introduction of a New OSS Interface • Changes to an Existing OSS Interface • Retirement of an OSS Interface. <p>Qwest and the CLECs have agreed to implement these processes coincidentally with the implementation of the IMA 10.0 release in June 2002. Qwest and the CLECs will continue to collaboratively monitor and refine these processes through CMP.</p> <p>To ensure that these agreed to processes are implemented quickly and effectively, Qwest is developing internal CMP training that is mandatory for Qwest IT personnel who work with systems that impact the CLECs.</p>	<p>A good example is when Qwest makes changes to its back-end systems. Qwest often does this with only notice to CLECs and no CR. CLECs then encounter problems and have to go through, what has to date been, a difficult process to get the issue addressed.</p> <p>Another problem with CRs is Qwest's ability to reject them and a CLEC's only recourse is to escalate and pursue dispute resolution. At this point Qwest has not agreed that CLECs should have the ability to reject Qwest CRs and make Qwest go through the dispute resolution process. This is an important issue to CLECs that will be discussed further in the CMP Redesign process.</p>
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b). Qwest fails to adhere to the practices and procedures documented in its CMP

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update

KPMG Consulting's response to each of the remaining issues identified in this Observation is listed below.

(1) *Qwest's OSS Release Calendar does not include dates for point release notes;*

Qwest updated the OSS Release Calendar on March 18, 2002 (available at <http://www.qwest.com/wholesale/cmp/osscalendar.html>). KPMG Consulting reviewed the updated document, noting that dates for IMA 9.01 and IMA 10.01 Release Notes were posted. KPMG Consulting considers this issue resolved.

(2) *Mailout Notifications were not found for the release notes for the two most recent point releases: IMA 8.01 (deployed November 19, 2001) and IMA 9.01 (March 25, 2002);*

KPMG Consulting received and reviewed the referenced Qwest Communicator for IMA 8.01, which was distributed on October 29, 2001. Qwest stated in its March 15, 2002 response that no separate notifier was sent to CLECs when the release notes were posted since there were no CLEC code impacts identified to IMA Release 9.01. KPMG Consulting considers consistency in the flow and distribution of information as a key element to managing the Qwest-CLEC business relationship, and would expect Qwest to notify CLECs of the existence of Release Notes even if Qwest had not identified CLEC-impacting changes in IMA 9.01. Release Notes for IMA 10.01 are currently scheduled for availability on July 29, 2002.¹ Due to the limited duration of this test, KPMG Consulting will be unable to observe the distribution of Release Notes for IMA 10.01. Therefore, KPMG Consulting considers this issue resolved.

(3) *CMP documentation does not specify the 30-day interval for distribution of point release notes.*

Qwest's March 15, 2002 response indicated that Qwest had mistakenly stated that Release Notes would be supplied to the CLEC community 30 days prior to the implementation date. Instead, Qwest clarified that, in accordance with Section 5.2 of the *Master Redlined CLEC Qwest Redesign Framework – Revised 03-07-02*, Qwest would post Release Notes to the Wholesale Web site 21 days prior to the scheduled release date. KPMG Consulting reviewed the referenced document and confirms that it includes the 21-day interval. Based on the above document review, KPMG Consulting considers this issue resolved.

KPMG Consulting recommends that Observation 3066 be closed.

¹ Based on the current OSS Release Calendar located at: http://www.qwest.com/wholesale/downloads/2002/020315/Qwest_OSS_Calendar_Version_06.doc

c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed			
E 3093	Qwest's document management practices are not reliable		
Testing Issue:	Qwest Response	AT&T Comments	
<p>Qwest lacks uniform standards and processes for document management. Qwest has provided, to CLECs, documents in which one or more fundamental items of reference, such as the author, business unit, release date, page numbers, version control, assumptions, and change logs, is absent.</p> <p>The absence of consistent document management makes it difficult for the CLEC to identify changes, implement training, update systems, and comply with Qwest practices.</p>	<p>12/19/01 - Based upon CLEC-Qwest processes agreed to in CMP Redesign for managing PCAT and Tech Pub documentation, Qwest is in the process of developing documentation control methodologies that can be implemented for all CLEC documentation. All documentation applicable to CLECs will follow these processes as soon as they are implemented. These processes will be in place and communicated to the CLECs no later than January 31, 2002.</p>	<p>This issue has been a source of concern raised by CLECs in the CMP redesign. As a result of these concerns, Qwest and CLECs developed a process called the interim Qwest Product and Process Change Request Initiation Process.</p> <p>To date, Qwest has not implemented that process as written. CLECs anxiously await implementation that is consistent with the agreed upon process.</p> <p>Qwest's response to this exception mentions Technical Publication and the PCAT (Qwest Product Catalog) only. This is not the full scope of documents identified by KPMG as being deficient with regard to document management. Qwest will need to insure that all its documents meet adequate document management standards.</p>	

c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

4/8/02
status
update

Summary of KPMG Consulting’s Retest Results:

Based on the documentation review, the overall retest results by document category are as follows:

Document Category	Reviewed	Satisfied	Not Satisfied
Business Process	43	42	1
Technical Publications	2	2	0
Release Documentation	13	13	0
Training	14	10	4
Overall	72	67	5

KPMG Consulting noted that less than seven percent of the tested Qwest documents failed to completely follow the document management standards set forth in the *Change Management Process: Documentation Management Process* and that Qwest’s performance for using the new documentation standards has significantly improved since the introduction of this issue in E3093 (i.e., the number of different errors occurring in the same document were minimal). KPMG Consulting is satisfied with the above retest results, and considers the identified issue to be resolved.

KPMG Consulting recommends that Exception 3094 be closed.

E 3102

Qwest’s inconsistent internal documentation will impede and impair successful operation of its CMP

Testing Issue:	Qwest Response	AT&T Comments
<p>Qwest’s internal OSS interface change management documentation is inconsistent and unclear. KPMG identified four Qwest documents in making this observation.</p> <p>While the documents contain large portions of similar information, inconsistencies such as important definitions for CR types, categories, and database fields exist</p> <p>12/17/01 - KPMG still had concerns after receiving Qwest’s 11/15/01 and 12/4/01 responses. The Qwest documentation still does not contain all necessary information. In addition, KPMG could not validate</p>	<p>11/15/01 – Qwest states that it is modifying its internal documents to reflect the change management process.</p> <p>12/4/01 – Qwest informed KPMG that two Qwest documents were retired on 12/1/01 and that it would provide two additional documents to KPMG.</p> <p>12/28/01 – Qwest has provided the IMA Change Management Plan and the IMA EDI Developer’s Handbook. These documents define processes and procedures internal to the Interconnect Mediated Access (IMA) system.</p> <p>All interaction between Qwest and CLECs, including CLEC initiated Change Requests (CRs) and trouble tickets, prioritization of CRs, communication of status, etc., is defined and managed through the Qwest Wholesale CMP and is beyond the scope of the IMA</p>	<p>Qwest’s internal documentation is very important because that is what Qwest personnel use to perform their duties. (NB. These documents do not appear to be available to CLECs generally, just to the P-CLEC under confidential treatment.) If those documents do not accurately reflect the processes agreed upon between Qwest and CLECs, there will be problems (i.e., Qwest will not be able to consistently adhere to its CMP).</p> <p>In CMP Redesign, there was a least one occasion when CLECs asked if they could see Qwest’s internal documents for a particular process to aid in development of the redesigned CMP. Qwest was not willing to provide such documents,</p>

<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<p>that changes made in the CMP redesign with CLECs are reflected in Qwest internal documents.</p> <p>It is critical that the internal OSS change management process be clearly documented and well formed for the management and implementation of changes requested by CLECs</p> <p>This started as Observation 3044, however, KPMG escalated it to an exception on 12/17/01.</p>	<p>documents in question</p> <p>As part of its more detailed response, Qwest directs KPMG to other documents that Qwest believes are responsive to the concerns raised by KPMG.</p>	<p>stating they are confidential.</p> <p>Qwest points to the CMP document that CLECs and Qwest are negotiating in the CMP Redesign. While CLECs have tried to include sufficient detail in that document to understand what CLECs can expect, AT&T believes that all the processes in the redesigned CMP document would be written into internal Qwest documents, such as methods and procedures, in greater detail so that the Qwest staff personnel have a very detailed understanding of the steps they need to take to satisfy the process.</p> <p>Qwest states that it will “complete a Wholesale CMP Methods and Procedures document approximately 30 days after the completed wholesale CMP redesign.” While AT&T believes that this is important, it begs the question of what Qwest personnel will use to implement the redesigned process in the meantime. The CMP redesign is currently schedule through April, 2002. If it actually ends at that time, such a methods and procedures document would not be ready before sometime in May, if Qwest could actually complete such a document in 30 days.</p>
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c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

4/8/02
status
update

The retest results for each of the identified issues are outlined below:

(1) Issue: Qwest documents lacked essential document management elements, including author and version control for determining the source and applicability of each document;

Qwest undertook several iterations of revision and updates to include the following changes in *IMA CMP*:

- Addition of document change log;
- Correction of the Table of Contents; and
- Correction of the Table of Figures.

KPMG Consulting reviewed the current version of *IMA CMP* and confirmed that the above improvements were applied. This issue is resolved.

(2) Issue: Internal OSS documents contained large portions of similar, but inconsistent information;

Qwest updated *IMA CMP* to absorb and integrate information from the following documents which it retired on December 1, 2001:

- *IMA Basic Classifications of Distributed Defect Tracking System (DDTS) CRs;*
- *IMA Process Description & Specification, CR Process.*

In addition, Qwest updated *EDI Developer's Handbook* to include the previously standalone document *EDI Development CR Process*.

KPMG Consulting reviewed revised documents and confirms the elimination of previously repetitive and inconsistent information. This issue is resolved.

(3) Issue: Documents included codes and abbreviations without definition;

KPMG Consulting confirms that the current version of *IMA CMP* includes definitions of all referenced codes and abbreviations. This issue is resolved.

(4) Issue: Certain process descriptions and process flows were either missing or unclear;

c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

KPMG Consulting confirms that the current version of *IMA CMP* includes entry and exit criteria for relevant processes. KPMG Consulting reviewed the document and verified information about CR life cycle, which includes initiation, scheduling, preliminary evaluation, solution design, system analysis, approval, software development, and closure. This issue is resolved.

In addition, Qwest provided KPMG Consulting with *Cross Release CCB Process*, which details the internal process for implementing emergency CRs. Qwest clarified, through the formal data request process, that its internal Change Control Board does not have the authority to deny or defer a CR that has been prioritized and packaged in CMP.

(5) **Issue: Documents lacked information about handling Change Requests (CRs) and communicating prioritization changes to stakeholders (i.e., internal systems development groups and the Wholesale CMP) appeared to be incomplete.**

KPMG Consulting received *PCRM Description* and *ClearDDTS User's Guide*, which contain information about the Qwest internal tools used to track trouble tickets and software development changes. In addition, Qwest updated *IMA CMP* to include references to production support and test environment. The revised document also specifies that, in accordance with CMP, Qwest will communicate to CLECs the status of CRs after release deployment. At the time of this Disposition Report, Qwest continuously updated the *Integration Document* to reflect CLEC-touch-point activities resulting from ongoing Qwest-CLEC negotiations in CMP Redesign. This issue is resolved.

Based on the above retest results, KPMG Consulting believes that the identified issues have been resolved.

KPMG Consulting recommends that Exception 3102 be closed.

**E 3111
(previously
O 3067)**

Qwest's internal processes do not provide for the CMP to be a part of its regularly performed systems development management process, including CR analysis, prioritization, resource allocation and packaging of CRs for implementation

	Testing Issue:	Qwest Response	AT&T Comments
	<p>Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs).</p> <p>In the absence of guidelines for the</p>	<p>12/20/01 - Qwest responses to the 5 KPMG stated issues.</p> <p>1. "Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs."</p>	<p>In the CMP Redesign, CLECs have sought information from Qwest on the process it uses to determine the resources required to complete a systems CR. CLECs have also sought to understand the other steps in the Qwest process, including "packaging"</p>

c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

system CR Prioritization Process, there is no assurance that all CRs receive a thorough assessment from the Qwest software development team. In addition, it is unclear how Qwest allocates resources for the wholesale OSS to accommodate CLEC business needs, and how Qwest estimates the resources required to complete individual CLEC-initiated CRs. Failure on the part of Qwest to attend to CRs that CLECs deem critical to CLEC business operations in a timely manner may result in lengthy delays in implementing these changes. In fact, the limited capacity that Qwest allows for each release may categorically prevent the implementation of some CRs.

Once approved by the Re-design Team, the **Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01**, located at <http://www.qwest.com/wholesale/cmp/redesign.html>, will further illuminate the process, roles and responsibilities of Qwest personnel during the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs.

2. *“Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release.”*

Qwest and the CLECs are currently negotiating the extent to which Qwest will disclose this business information to the CLECs. This issue will be resolved and included in the Qwest Proposed Prioritization Language when it is accepted by the Re-design Team.

3. *“Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs.”*

Detailed business and systems requirement development occurs after the CLECs and Qwest prioritize the list of CLEC initiated CRs pursuant to the Co-Provider Industry Change Management Process document, Section IV. Additionally, the Qwest Proposed Prioritization Language, collaboratively written by Qwest and the CLECs, but not yet adopted by the Re-design Team, details the following:

- There is insufficient space to include all CLEC initiated CRs in the upcoming release. The prioritization process channels the business and system requirements development effort.

(where CRs with “affinities” are grouped together) and business and systems requirements. These **discussions have been cut short and never completed**. Understanding this is important to CLECs because Qwest tells us that there is a limited pool of resources to complete work on a systems release. This has meant that only some of the CRs get worked for a given release. The ones that are not worked in this process need to compete for resources again in the next release and may never get completed.

Qwest’s response to item 1 suggests that the redesign discussion has addressed the “roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs.” **In fact there has been no discussion beyond identifying steps in the process. CLECs have sought to understand this, but the information has not been forthcoming from Qwest.**

(Item 4) While the language relating to sizing is in the redline document, as Qwest points out **CLECs have requested further discussion and explanation of this step**, to include the man hours necessary for the different levels of effort. This work still needs to be done.

KPMG’s observation with item 5 is accurate. **The packaging step remains vague**. Hopefully, the discussions

c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

- The business and system requirement development effort begins with CRs at the top of the prioritization list and continues down the list until all available development resources are exhausted.
 - Business and systems requirements are developed for more CRs than can ultimately be included in the release.
4. “Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as “T-shirt size”) assignment for individual CRs.”
- The Co-Provider Industry Change Management Process document does not have specific definitions for Level of Effort. However, in the Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 11-29-01 the following language has been agreed to in the CLEC-Qwest OSS Interface Change Request Initiation Process section:
- “Identification of the preliminary level of effort (S, M, L, XL) required to implement the CR.
- Small – requires changes to only one subsystem of a single system
 - Medium – requires changes to 2 or more subsystems of a single system
 - Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
 - Extra Large – requires extensive redesign of at least one system.”

referenced will bring light to this step and further modification to the master redline CMP document, if appropriate.

<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<p>5. <i>Qwest documents lacked information on how Qwest identified CR package options “for a software release that it recommended to CLECs, following the CR Prioritization Process.”</i></p> <p>The <i>CLEC-Qwest OSS Interface Change Request Initiation Process</i> section of the <i>Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01</i> provides the following language which has been agreed to by the CLECs and Qwest:</p> <p>“At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release.”</p>	
<p>4/8/02 status update</p>	<p>KPMG Consulting reviewed various internal documents, verifying that Qwest had adequately addressed each of the five issues raised in this Exception through documentation modifications and enhancements to the process. However, KPMG Consulting observed that Qwest and CLECs had not finalized the prioritization and packaging processes before prioritization for IMA Release 10.0 took place. Therefore, adherence to the new process was unable to be confirmed for at least two of the original issues raised in Exception 3111 - issue reference numbers (2) and (5).</p> <p>Exception 3111 was the subject of the Focus Call on March 21, 2002. Qwest requested that KPMG Consulting review IMA Release 10.0 to test its applicability to the current processes since packaging for IMA Release 11.0 is not scheduled to occur until after the conclusion of OSS 271 Third Party Testing. KPMG Consulting stated in its March 27, 2002 response that there are several areas where the new prioritization and packaging process was either not established, or not followed, for IMA 10.0. Since the process was not completely established and followed for IMA Release 10.0, and packaging and prioritization for Release 11.0 is scheduled to occur beyond the completion of this Test, KPMG Consulting was unable to test adherence to the complete prioritization and packaging process for a new IMA Release.</p>	

c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

Given the significance of prioritization and packaging processes in allocating IT resources and managing overall changes applied to Qwest Wholesale OSS interfaces, KPMG Consulting cannot reach a definitive conclusion regarding current processes without verifying the participants' adherence. Qwest requested on April 3, 2002, that KPMG Consulting conduct no further testing related to this Exception. Qwest recognized that this will not allow KPMG to observe Qwest's adherence to the complete end-to-end prioritization and packaging processes for a single major system release.

KPMG Consulting recommends that Exception 3111 be closed inconclusive.

	d). The CMP does not address issues reasonably defined as CMP issues		
IWO1075	CICMP is not collaborative; prioritization process excludes CLECs		
4/8/02 status update	ACC Staff required CGE&Y to conduct an evaluation of the Qwest Change Management Process Redesign. The CGE&Y evaluation report is the subject of workshops scheduled for April 17-19, 2002.		
	Testing Issue:	Qwest Response	Analysis
	<p>The current CICMP process is not a true collaborative effort for making changes to the CLEC-specific pre-order, order, and repair interfaces.</p> <p>The process, as it exists today, only addresses roughly a third of the changes that are made to these interfaces. Since these are interfaces that were created and exist solely for the purpose of exchanging information with Co-Providers, all changes to them should be discussed and voted on by the systems' primary users – the CLECs – in a collaborative effort with Qwest.</p>	<p>10/25/01 - The re-designed Change Management Process (CMP) provides a collaborative process for making changes to CLEC-specific pre-order, order, and repair interfaces. The re-designed CMP defines four OSS Interface Change Request (CR) types. CLEC Originated and Qwest Originated OSS Interface CR types are prioritized exclusively by the CLECs.</p> <p>Regulatory and Industry Guideline OSS Interface CR types, which can be initiated by either a CLEC or Qwest are not subject to prioritization regardless of the source of origination.</p>	<p>CLECs have proposed that regulatory CRs should be subject to prioritization along with all other types of Change Requests, with the condition that for any mandated Regulatory Changes that have mandatory implementation dates, prioritization would not interfere with Qwest's ability to meet those dates.</p> <p>Industry Guideline changes are rarely mandatory so there would generally be no basis for putting these changes ahead of other change requests and they should be prioritized.</p> <p>The standard for determining into which category a given change requests falls requires agreement between Qwest and CLECs. There is recent experience that shows the significance of the needs for clear guidelines on defining the appropriate CR category.</p>
E 3112	Qwest has not implemented a comprehensive and fully documented production support process to address changes that correct failures in the production version(s) of OSS interfaces.		
	Testing Issue:	Qwest Response	AT&T Comments
	KPMG Consulting has observed that Qwest does not have a documented	Qwest provided an "integration document" to KPMG via the data request process. The Integration Document addresses criteria A and	AT&T finds that the criteria cited by KPMG for the competency of the production support process are

d). The CMP does not address issues reasonably defined as CMP issues

<p>production support process in place to resolve time-sensitive production support issues and changes. KPMG Consulting formally identified this issue in Observation 3052. In response, Qwest provided KPMG Consulting with documents that specify OSS contingency plans. KPMG Consulting reviewed Qwest documentation, and determined that Qwest does not have a distinct, consolidated process document to address the issue in question.</p>	<p>criteria C – G of this exception.</p> <p>Criteria B refers to evaluation, categorization, and prioritization procedures. The Wholesale CMP prioritization document has not been finalized, pending the completion of CMP Redesign. This portion of the redesign effort is anticipated to be completed by February 19, 2002. Qwest will provide an update on the status of this item by February 22, 2002.</p> <p>Qwest is in the process of making revisions to the Integration Document that address documentation management procedures and training procedures identified in criteria H & I above. Qwest will provide an updated version of the Integration Document by February 22, 2002 that will address criteria H and I.</p>	<p>reasonable. These are:</p> <ul style="list-style-type: none"> A. Identification and verification procedures; B. Evaluation, categorization, and prioritization procedures; C. Internal and external communication procedures; D. Status tracking and reporting procedures; E. Escalation procedures; F. Restoration and closure procedures; G. Testing procedures, including support for defects observed in test environments; H. Documentation management procedures; and I. Training procedures.
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d). The CMP does not address issues reasonably defined as CMP issues

4/8/02
status
update

KPMG Consulting reviewed the updated documentation, as well as Qwest's various responses to this Exception to determine if Qwest had enhanced the documents and addressed the remaining issues raised by KPMG Consulting.

The re-test results for each of the identified issues are outlined below:

1. *Applicability of Qwest response intervals to both Ticket Notifications and System Event Notifications*

KPMG Consulting's review found that the updates and clarifications to the documentation and references define the response intervals for both Ticket Notifications and System Event Notifications. **KPMG Consulting would expect future updates to this Production Support documentation to include clear references to intervals associated with each of the respective ticket types.**

2. *Definition of Qwest response intervals for Production Support notifications*

KPMG Consulting's review found that the updates and clarifications to the documentation and references define the response intervals for production support during normal and after hours of operations of the WSHD. KPMG Consulting noted that Qwest stated that it may work directly with a CLEC or various CLECs to resolve an issue, and may communicate with them informally during the problem solving activity. **However, KPMG Consulting expects that Qwest would still issue proper notification to CLECs regardless of potentially unique trouble situations.**

3. *Treatment of Severity 3 and 4 troubles through the Change Management Process*

KPMG Consulting's review found that the updates and clarifications to the documentation and references define the expectations regarding Severity Level 3 and 4 issues. KPMG Consulting recognizes Qwest has limited resources to devote to Severity Level 3 and 4 issues, and that those issues do not necessarily warrant the same level of attention. However, **KPMG Consulting believes that a more formal process could be established in the future by Qwest to ensure that such changes are handled in a procedural manner.**

4. *Varying level of detail and consistency on the roles and responsibilities for Tier 2 and 3 Production Support*

KPMG Consulting's review found that the updates and clarifications to the documentation and references define the roles and responsibilities of the Tier 2 and Tier 3 production support personnel. Qwest noted in its March 27, 2002 response that Tier 3 roles may not be documented in all product support documentation based on the purpose and scope of such documentation. **KPMG Consulting recommends that Qwest consistently document the**

d). The CMP does not address issues reasonably defined as CMP issues

various product support functions in future updates, so that the process is uniformly understood and applied.

5. **Qwest notification to CLECs regarding known defects and target fix dates**

KPMG Consulting reviewed the *Unplanned Notification Process*, noting that the scope had been clarified to include that notifications will be sent to CLECs for back-end system changes that Qwest has identified. Qwest provided an example of an Event Notification in which Qwest discovered an issue, but for which the CLECs did not detect the fault. Qwest internal personnel identified and followed the process according to the Unplanned Notification Process. However, **KPMG Consulting noted that the CLEC community is discussing this topic during CMP meetings. The outcome of the discussions in the CMP meetings may affect the outcome of future documentation updates and potential changes to the Production Support process.**

O 3052

Contingency plans do not provide for a process to address problems encountered in production systems

Testing Issue:	Qwest Response	Analysis
<p>Qwest's Change Management Process (CMP) does not have documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces. KPMG Consulting observed that Qwest CMP does not have a documented process to address production support changes.</p> <p>KPMG further indicated that through its review of Qwest OSS contingency documents, it found no specific references to, and consideration of, Qwest interactions with CLECs</p> <p>These contingency plans</p>	<p>11/15/01: Qwest confirmed that contingency plans exist and described its internal process.</p> <p>11/28/01: Qwest provides KPMG with contingency plans and/or processes that exist to correct potential failures in the production versions of OSS interfaces via the usual data request process (DR no. TI-676S1) for the following systems: CPPD (CPS), CRIS, EXACT, IABS, IMA, and MEDIACC/CEMR. Still outstanding are documents for two other systems: HEET and TELIS.</p> <p>12/5/01: Qwest provides KPMG with the documents for HEET, but not TELIS stating that those documents are proprietary to a vendor.</p> <p>12/28/01: Qwest states that it has negotiated a production support document with CLECs for the CMP process. Qwest further states that he Qwest Wholesale Systems Help Desk will update its methods</p>	<p>Qwest and CLECs did discuss and tentatively agree upon production support language for the redesigned CMP. One significant part of that process that has not yet been addressed is a technical escalation process to address problems that are not being worked to resolution in a timely manner.</p> <p>The CMP language for production support was completed (except for the technical escalation process) at the CMP Redesign meeting held on December 10 – 11, 2001. At that meeting, the Qwest SME stated that the production support process would not be implemented before February 2002 (this is reflected in the draft minutes from the meeting). Qwest's response to KPMG that it would be implemented by January 3, 2002 should be</p>

d). The CMP does not address issues reasonably defined as CMP issues			
	illustrate fragments of a production support framework, but do not constitute a comprehensive process that defines how this change category is integrated into the overall CMP.	and procedures and conduct training by January 3, 2002 to ensure that Help Desk personnel follow the procedures outlined in the CMP Production Support document	questioned.
4/8/02 status update	<p>The original purpose of Observation 3052 was to address the lack of documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces. From the review of the existing documentation and the subsequent Qwest responses, KPMG Consulting determined that Qwest does not appear to have a well formed process for addressing failures in the production version(s) of OSS interfaces. Therefore, KPMG Consulting issued Exception 3112 to specifically address inadequacies in the Production Support process. Observation 3052 remained open to focus on the clarity, accuracy, and consistency of relevant process documentation. However, KPMG Consulting believes that one of the essential criteria that constitutes a well formed process is clear and comprehensive documentation that describes the process and all of its related components. Once Qwest has developed a clearly defined and consistently deployed production support process to address failures in the production version(s) of OSS interfaces, there is an inherent expectation that the process will be clearly documented for internal and external parties, as appropriate. Therefore, KPMG Consulting believes that the issues identified under Observation 3052 can and will be addressed completely within the context of Exception 3112.</p> <p>KPMG Consulting recommends that Observation 3052 be closed, and that all Production Support process documentation issues be addressed within the context of Exception 3112.</p>		