

Initial Release Date: January 24, 2002  
First Response Date: March 13, 2002  
Second Response Date: March 27, 2002  
Disposition Report Date: April 2, 2002

**EXCEPTION DISPOSITION REPORT**

An exception has been identified as a result of the test activities associated with the Change Management Review, MTP Test 23.

**Exception:**

**Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.**

**Summary of Exception:**

Qwest utilizes the Mailout Notification System to distribute information that pertains to CLECs business operations. These notifications cover a wide range of topics including documentation updates, new product offerings, training availability, OSS planned outages, Qwest-CLEC meeting notices, Qwest's responses to CLEC-initiated change requests, and notices specifically concerning the Qwest Change Management Process (CMP). These distributions are critical to allow CLECs to make informed decisions about their business operations, as well as to maintain the Qwest-CLEC business relationship. CLEC representatives rely on accurate email headlines and timely notices to redistribute the emails within their respective organizations.

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:

- (1) Discrepancies between document dates and actual distribution dates indicated Qwest had not distributed some notifications in a timely manner;
- (2) Inaccurate description of notification in an email headline;
- (3) Late notice of system changes;
- (4) Inadequate interval for announcing planned outages;
- (5) Inadequate information about cost docket rate changes;
- (6) Lack of adequate tracking and verification of documentation intervals.

**Summary of Qwest's Initial and Supplemental Responses:**

Qwest's responses indicated that the following remedies were implemented to address issues identified in this Exception:

- (1) The Qwest Notification Department implemented a log-in process to ensure that all documents are distributed in a timely manner.
- (2) Qwest made corrections as soon as it had detected that an inaccurate description of notification had been applied – Qwest distributed a corrected notification with the appropriate headline shortly after the original email notification.

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- (3) Qwest implemented a notification process and corresponding set of intervals to provide CLECs with advance notice of bill rate validation activities. With respect to three other late notices of system changes, Qwest stated that it was unable to provide CLECs with advance notices prior to error resolution.
- (4) In accordance with results from CMP Redesign discussion, Qwest implemented the 48-hour interval for unplanned outages effective February 1, 2002.
- (5) Starting March 1, 2002, Qwest implemented a new notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes.
- (6) Qwest implemented a Web-based depository on January 31, 2002 so that CLECs could search and retrieve past notifications. Qwest also confirmed that although it does not employ a centralized database or other mechanism for tracking adherence to established CMP intervals, it does have documented procedures and project plans for tracking CMP deliverables.

### **KPMG Consulting's Disposition Report (04/02/2002):**

#### **Summary of KPMG Consulting's Retest Activities:**

Exception 3110 identified six issues with the notifications that Qwest distributes to the CLEC community. KPMG Consulting conducted retesting of Qwest notifications with respect to issues (1) and (4). KPMG Consulting reviewed Qwest's responses along with substantiating material, and confirmed that Qwest had taken steps to address issue (2) and (5). Issue (3) relates to advance intervals for notifying CLECs about unanticipated system fixes, patches, or unplanned outages. KPMG Consulting determined that this issue falls within the scope of another report, Exception 3112, and will address it accordingly. KPMG Consulting was unable to fully test for resolution of issue (6) since established intervals and milestones will occur outside of the scope of the Change Management Process test execution phase.

#### **Summary of KPMG Consulting's Retest Results:**

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.

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.

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

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inform CLECs at least 15 days in advance of the implementation of cost docket rate changes. KPMG Consulting subsequently closed issue (5).

## *Issue #6 Lack of Adequate Tracking and Verification*

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 *Master Redlined CLEC-Qwest CMP Redesign Framework*. 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.

**KPMG Consulting recommends that Exception 3110 be closed as inconclusive.**