

Initial Release Date: December 11, 2001  
First Response Date: January 6, 2002  
Second Response Date: February 5, 2002  
Third Response Date: April 2, 2002

**EXCEPTION REPORT**

An exception has been identified as a result of the Qwest documentation review, and information gathered during interviews, for the OSS Interface Development Review, Test 24.6.

**Exception:**

**Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs testing capabilities for all Qwest products offered in production.**

**Background:**

Qwest employs a phased approach for CLECs that wish to develop an IMA/EDI application-to-application interface with Qwest's OSS systems. The steps of the current process are listed below:<sup>1</sup>

1. Initial Communications (includes Kick Off conference call)
2. Project Plan (proposed/negotiated)
3. Requirements Review (by the CLEC)
4. Firewall Rules and IA-to-IA Testing
5. Testing - Interoperability and/or SATE environment
6. Controlled Production
7. Production ("Turn-Up")

Qwest developed SATE in May 2001 to serve as an alternate testing environment to its Interoperability environment. By creating SATE, Qwest now offers CLECs the option of using either the Interoperability environment or SATE for testing their IMA EDI interfaces. The latest version, SATE 8.01, was implemented as of October 22, 2001.

**Issue:**

KPMG Consulting has observed, through interviews and documentation reviews, that the IMA EDI SATE does not offer testing capabilities to CLECs, prior to connecting to Qwest's production systems, for all Qwest resale products. The following IMA EDI SATE limitations have been identified:

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<sup>1</sup> EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 6.0, Released October 11, 2001, Section 2, Implementation Activities, p.6.

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- SATE does not allow for testing of all of the products that are supported in the IMA production environment. Currently, SATE only supports the following transactions<sup>2</sup>:

### **Pre-Order**

- Address Validation (Numbered Addresses only)
- Appointment Scheduling
- Cancel TN/Appointment
- Connecting Facility Assignment
- Facility Availability (Unbundled ADSL, Convert POTS to Unbundled Loop, POTS Facility Availability)
- Meet Point Query
- Raw Loop Data Query
- Retrieve CSRs
- Service Availability
- TN Reservation Query (with TNSR following)

### **Order**

- Centrex Plus
- Directory Listing Only
- Local Number Portability
- Loop with Number Portability (LNP only)
- POTS Resale
- Shared Loop
- Unbundled Loop
- UNE-P Centrex
- UNE-P POTS

### **PostOrder**

- FOC
- Completion
- Reject
- Jeopardy
- Status Updates

The transactions above represent only a subset of the total transactions that are supported in the IMA EDI environment. Certain products that CLECs may offer to their customers may not be supported in the test environment. Therefore, SATE does not accurately and comprehensively support all of the transactions that are available in Qwest's production environment. This, potentially, prohibits CLECs from testing all of their products before migrating to the production environment.

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<sup>2</sup> EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 7.0, Released November 9, 2001, Section 2, Implementation Activities – Progression Testing Phase, p.23.

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- If a CLEC desires to test a product that is not currently supported in SATE, the additional product(s) must be requested via a Change Request (CR), through the Change Management Process (CMP). The CR is then prioritized, in accordance with the CMP. As an example, Qwest announced at a SATE Enhancement User Group meeting on November 27, 2001, that it would submit two CRs for adding Line Splitting and Loop Splitting. Once these CRs are submitted, they will need to be discussed and prioritized within the parameters of the CMP. Given the current schedule for CMP, the requesting CLEC(s) may have to wait several months for a new release before the requested products are included in SATE's functionality. Therefore, the CLEC(s) cannot test all of its products for the current IMA release.

#### **Impact:**

A limited testing environment could prevent a CLEC from adequately preparing for its transition to a production environment. By not providing for testing of all of Qwest's available products in SATE, CLECs will not be able to sufficiently test all of the products that they can sell to their customers. This limitation, therefore, could negatively impact a CLEC's ability to offer products to its customers in the production environment. For products for which a testing capability is not offered, CLECs must venture blindly into the production environment, potentially jeopardizing their ability to offer those products to their customers, if the migration is unsuccessful.

#### ***Qwest Formal Response (12/19/02):***

When Qwest initially deployed SATE, any product that a CLEC had implemented into production or was in the process of testing was included in SATE<sup>3</sup>. This ensured that when SATE was placed into production, it would support those products that the CLECs needed to be able to use SATE to migrate to the next release. Additionally, on June 29, 2001, prior to SATE deployment, Qwest conducted a CLEC meeting where the list of proposed SATE products was discussed. The CLECs<sup>4</sup> expressed no concerns regarding the proposed product list. Qwest continues to support all products for which any CLEC has created a production EDI interface.

The current process for the addition of new products to SATE is for a CLEC to issue a CR through the change management process. The CR can then be processed by the CLEC community; this process ensures that Qwest is using its resources in the manner that is beneficial to the most CLECs.

Qwest has conducted five SATE Users' Group meetings. During these meetings, CLECs have an opportunity to suggest improvements to SATE. To date, no CLEC has requested the addition of products to SATE. However, Qwest continues to monitor the products that CLECs express interest in and has proactively added products or created CMP CRs to add products to SATE. Unbundled Distribution Loop and Unbundled Distribution Loop with Number Portability have recently been added to SATE, as Qwest anticipated future EDI implementations of these

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<sup>3</sup> The pseudo-CLEC was excluded when this analysis was performed.

<sup>4</sup> AT&T, WorldCom, Fairpoint, Sprint, and Allegiance

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products. Additionally, Qwest is creating a CR for FBDL to be added to SATE, as this will be implemented as an IMA product in 9.0.

In the next SATE Users' Group Meeting on January 8, 2001, Qwest will ask CLECs to voice any concerns regarding the prioritization of new product implementations.

Furthermore, as part of the CMP Redesign process, Qwest and the CLECs are currently discussing a Bona Fide Request process to allow a CLEC to pay for CRs to be implemented when a CR does not get prioritized high enough to get worked based upon the available Qwest resources. If agreed upon, this process would allow a CLEC to add a product to SATE even if it is not a priority for the CLEC community.

#### **KPMG Consulting's First Response (01/06/02):**

KPMG Consulting acknowledges that Qwest worked with the CLEC community when initially developing SATE, and through user group meetings for continually enhancing SATE. Although SATE currently supports all products that CLECs are currently running in production, it does not support all products that a CLEC *could* run in production. A CLEC that decides to add a new product to the suite of products that it offers to its customers, but for which that product is not currently supported in SATE, must submit a CR through CMP in order to be certified to provide that service/product in production. Several major releases of SATE may be required before the new product is then added to the test environment. This does not allow a CLEC sufficient flexibility to offer new products in a timely manner; nor does it appear to offer a test environment that adequately mirrors production environment capabilities.

Qwest stated in its response dated December 19, 2001, the following:

*"Qwest has conducted five SATE Users' Group meetings. During these meetings, CLECs have an opportunity to suggest improvements to SATE. To date, no CLEC has requested the addition of products to SATE."*

However, at the November 13, 2001 SATE User's Group Meeting, a participant requested that Line Splitting and Loop Splitting products and all associated activities be added to those supported by SATE.<sup>5</sup> Qwest then drafted a CR, on behalf of the participant, to present to the CMP forum.<sup>6</sup> The requesting participant may have to wait for several versions of SATE to be released before being able to test transactions associated with these products, thereby potentially placing the CLEC at a competitive disadvantage with its customers. Sudden, unexpected demand to test new products in SATE has occurred, and could occur at any point in the future, yet SATE does not support all of the products offered in production.

Qwest also stated the following in its response dated December 19, 2001:

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<sup>5</sup> SATE Users' Group Meeting Minutes, Dated November 13, 2001, "Interoperability and SATE" section, p.1.

<sup>6</sup> SATE Users' Group Meeting Minutes, Dated November 27, 2001, "Proposed CMP CRs" section, p.1; and SATE Users' Group Meeting Minutes, Dated December 4, 2001, "Proposed CMP CRs" section, p.1.

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*“Furthermore, as part of the CMP Redesign process, Qwest and the CLECs are currently discussing a Bona Fide Request process to allow a CLEC to pay for CRs to be implemented when a CR does not get prioritized high enough to get worked based upon the available Qwest resources. If agreed upon, this process would allow a CLEC to add a product to SATE even if it is not a priority for the CLEC community.”*

The Bone Fide Request process appears to present CLECs with an option to bypass the inherent constraints of the CMP process – specifically, the need for CR prioritization that will lead to implementation. However, this process will not be fully developed until the CMP redesign is completed. Additionally, although implementation of the Bone Fide Request process may allow CLECs to pay to implement a CR, regardless of its CMP-assigned priority level, it does not alter the fact that SATE does not currently support all of the products offered in production. KPMG Consulting believes that the functionality a fully functioning test environment should mirror that of the production environment.

**KPMG Consulting recommends that Exception 3095 remain open until SATE supports the products that are offered in Qwest’s production environment.**

#### ***Qwest Response to KPMG Comments (01/30/02):***

Qwest supports the CMP processes through which the CLECs must prioritize all new functionality, including SATE changes. The addition of a new product, either at the initiation of Qwest or a CLEC, constitutes an addition in functionality to SATE. Based upon feedback during the SATE CMP Users’ Group meetings and the last CMP meeting, it appears that the CLECs want to prioritize all SATE functionality, including the addition of new products. During the January 17<sup>th</sup> CMP meeting, Qwest took an action item to further discuss the implementation of SATE prioritization at the February CMP Redesign sessions. Based upon discussions to date, Qwest and the CLEC community appear to be in agreement on this issue.

Even without the availability of a product in SATE, a CLEC has the ability to implement the product in EDI using the Interoperability environment. Therefore, CLEC(s) can test all of the products for the current IMA release. Additionally, Qwest has not seen or been informed by CLECs of “sudden, unexpected demand to test new products” in SATE as stated in KPMG’s First Response. While CMP CRs exist for two products to be added to SATE, no CLEC has requested an implementation of either of the products in EDI. With the availability to test within the Interoperability Test Environment and the fact that CLECs are not requesting these products be added to SATE, the impact identified in the initial release of this exception<sup>7</sup> as noted below is an inaccurate statement.

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<sup>7</sup> KPMG original Impact statement: “For products for which a testing capability is not offered, CLECs must venture blindly into the production environment, potentially jeopardizing their ability to offer those products to their customers, if the migration is unsuccessful.”

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#### **KPMG Consulting's Second Response (02/05/02):**

KPMG Consulting acknowledges that Qwest has been working with the CLEC community through both the CMP Redesign sessions and the SATE Enhancement meetings. Part of the purpose of these discussions is to develop a sound, consistent process for supporting the CLECs with their EDI testing efforts. KPMG Consulting has attended all of these meetings, and has reviewed the meeting minutes from each. Based on those observations and reviews, KPMG Consulting has found no concrete evidence to support that CLECs have specifically agreed that it is acceptable for SATE to support less than 100% of the products available in the production environment. KPMG Consulting's expectation is that a fully functional test environment should support all of the functionality and products that are available in the production environment, unless the CLECs have officially agreed through CMP, or an equivalent forum, that specific functionality is not required in the test environment.

Even if the CLEC community were to agree that not all production products must be supported in SATE, Qwest should be able to accommodate testing for any product that a CLEC decides it needs to test for its implementation of EDI. As stated previously, under the current process, CLECs that want to add new products to SATE must create a CR, which must then be prioritized through CMP. As such, the potential exists for requested products to not be available for testing for at least two major releases of SATE. If CLECs wish to test a new release of Production, and that new release version offers an expanded array of new products, CLECs might not be able to test the new products until well after their implementation in Production.

This significantly impairs CLECs' ability to test products that they would like to implement and offer to their own customers. The fact that CLECs have not historically made unanticipated requests to test and implement products not currently supported in the test environment does not negate the fact that such an occurrence could happen, and that Qwest's testing process should account for the possibility of such an occurrence.

In an attempt to address this issue, Qwest's response, dated January 30, 2001, stated:

*"Even without the availability of a product in SATE, a CLEC has the ability to implement the product in EDI using the Interoperability environment. Therefore, CLEC(s) can test all of the products for the current IMA release."*

KPMG Consulting does not believe that the use of the Interoperability environment for testing products not currently supported in SATE can sufficiently address this concern. As KPMG Consulting previously outlined in Exception 3029, the Interoperability environment has the following limitations:

1. Interop does not generate post-order responses in the same manner as they are created in production,
2. Interop does not provide flow through,

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#### 3. Production data must be used in Interop.

In Exception 3029, Qwest sought to address each of these Interop concerns by stating that SATE has, or will eventually have, the features and functionality necessary to overcome the deficiencies of Interop. Qwest also states, in its October 19, 2001 response to Exception 3029, “*Qwest has no plans to continue to enhance the Interop environment; Qwest will continue to enhance SATE.*” Finally, as outlined in KPMG Consulting’s January 31, 2002 response to Exception 3029, Qwest has not yet adequately developed and documented a process for CLECs to seamlessly use both the Interop environment and SATE when testing for a single implementation of IMA EDI.

Based on the identified limitations of the Interop environment, and the assertions made in Exception 3029, KPMG Consulting believes that offering CLECs the Interop environment as an alternative for testing products that are not currently supported in SATE is insufficient.

KPMG Consulting recommends that Exception 3095 remain open until enhancements are made to the SATE testing process, so that SATE supports all of the functionality and products that are offered in Qwest’s production environment.

#### ***Qwest Response to KPMG Supplemental Recommendation (02/26/02):***

In the KPMG Second Response (02/05/02), KPMG noted several specific concerns regarding SATE supporting all functionality and products that are offered in Qwest’s production environment. Each of the bullet points below represents Qwest’s understanding of KPMG’s concerns followed by Qwest’s response.

1. “*...KPMG Consulting has found no concrete evidence to support that CLECs have specifically agreed that it is acceptable for SATE to support less than 100% of the products available in the production environment.*”

As of February 22, 2002, Qwest created 30 Change Requests (CRs) that identify adding to SATE those production products not currently supported in SATE (SCR021902-01 to SCR021902-30). This is in addition to the 2 CLEC sponsored CRs previously created for Loop Splitting and Line Sharing. These CMP CRs appear in the "CMP Change Requests -- Systems Interactive Report" on the Qwest CMP web site, and are eligible for presentation and CLEC voting at the Monthly Systems CMP Meeting to be held on March 21, 2002. An interactive report showing these requests may be accessed at: <http://www.qwest.com/wholesale/cmp/changerequest.html>.

Qwest believes that this formal CR presentation and voting will provide concrete evidence of CLEC support for SATE supporting less than 100% of products available in the production environment.

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2. “... Qwest should be able to accommodate testing for any product that a CLEC decides it needs to test for its implementation of EDI. As stated previously, under the current process, CLECs that want to add new products to SATE must create a CR, which must then be prioritized through CMP. As such, the potential exists for requested products to not be available for testing for at least two major releases of SATE.”

Qwest is investigating the general level of effort necessary for adding existing IMA products to SATE (depending upon product complexity) in order to address KPMG’s concern regarding the timing of product availability. However, as Qwest has stated in its January 30, 2002 response Qwest believes that the CLECs have clearly expressed their interest during the CMP Redesign meetings in prioritizing all additions of functionality and products to SATE independently of IMA CRs. This separate prioritization provides the CLEC community with the flexibility to implement SATE specific changes ahead of other IMA functionality (for example, implementing flow through before a new product that no CLEC is planning to use in production). Qwest supports this CLEC desired process and believes the process should be adhered to.

Qwest will supplement this response with further detail regarding both issues by March 26, 2002 following the Monthly Systems CMP meeting.

#### ***Qwest Supplemental Response to KPMG Supplemental Recommendation (03/26/02):***

In reference to item 3 above, the following discussion occurred around SATE ranking at the Systems CMP meeting held on March 21, 2002.

The prioritization process for SATE was discussed and the ballot and instructions will be sent out by 5 p.m. MST, March 25, 2002. Completed ballots (1 per CLEC) are due to Qwest by 5 p.m. MST, March 28, 2002. Qwest will then tally and tabulate the results with a prioritized list provided to CLECs by 5 p.m. MST, April 1, 2002. The prioritization form was reviewed and it was noted that Qwest has added CRs to add products in SATE. Qwest wants to gauge the level of interest on the CLECs part for adding specific products. As part of prioritizing each CR, Qwest asked that the CLECs additionally indicate yes or no if they are interested in adding these products in SATE. The prioritized list will include yes/no interest in product implementation.

In reference to item 4 above, the attached meeting minutes from the SATE Users Group on February 26, 2002 clearly indicates the CLECs desire to prioritize SATE CRs independently from IMA CRs. Additionally, the CLEC community has adopted this position, incorporating it into the CMP Master Redline document (see section 9.0 PRIORITIZATION). This process will be followed going forward.

Qwest will provide a supplemental response to this exception once the results of the CLEC vote for SATE CRs are available by April 3, 2002.



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**Attachment(s):** ROC\_TI765\_EXP3095\_SATE Users Group Meeting Minutes 022602.doc

#### **KPMG Consulting's Third Response (04/02/02):**

In its February 26, 2002 response, supplemented on March 26, 2002, Qwest focused on two issues regarding the current functionality of SATE, and the process for adding new functionality to SATE. Those issues are restated below with KPMG Consulting's respective responses.

1. *"...KPMG Consulting has found no concrete evidence to support that CLECs have specifically agreed that it is acceptable for SATE to support less than 100% of the products available in the production environment."*

KPMG Consulting reviewed the "CMP Change Requests -- Systems Interactive Report", noting the addition of the 30 SATE "production equivalent functionality" CRs (SCR021902-01 to SCR021902-30) that Qwest referenced in its February 26, 2002 response. Qwest stated that these CRs would be voted upon in the CMP meeting held on March 21, 2002. KPMG Consulting observed the prioritization and voting process for the SATE functionality CRs at the CMP meeting.

KPMG Consulting also received a copy of the SATE Prioritization Form and Instructions on March 25, 2002. KPMG reviewed the form, noting that it included 49 IMA CRs, including 22 of the 30 originally Qwest proposed SATE functionality additions. However, KPMG Consulting noted that the following CRs were removed from the list that Qwest originally proposed:

- SCR021902-9
- SCR021902-10
- SCR021902-11
- SCR021902-12
- SCR021902-15
- SCR021902-20
- SCR021902-23
- SCR021902-25
- SCR021902-28
- SCR021902-30

KPMG Consulting is not sure why certain CRs were removed from the voting and prioritization form. Based on this omission, it does not appear that CLECs were offered the opportunity to vote on all products that could be added to SATE. With the exception of the removed CRs, KPMG Consulting noted that the voting form allowed CLECs to indicate whether or not they want to have the stated product functionality added to SATE for each CR.

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Qwest stated in its March 26, 2002 response that it would provide a supplemental response to this Exception once the results of the CLEC vote for SATE CRs are available by April 3, 2002. Once Qwest clarifies the reasons for removing the ten SATE CRs listed above, and provides the results of the prioritization activity, KPMG Consulting will be able to assess CLECs desire to have the same products supported in SATE as what is available in IMA.

2. *“... Qwest should be able to accommodate testing for any product that a CLEC decides it needs to test for its implementation of EDI. As stated previously, under the current process, CLECs that want to add new products to SATE must create a CR, which must then be prioritized through CMP. As such, the potential exists for requested products to not be available for testing for at least two major releases of SATE.”*

In its February 26, 2002 response, Qwest stated the following:

*“Qwest is investigating the general level of effort necessary for adding existing IMA products to SATE (depending upon product complexity) in order to address KPMG’s concern regarding the timing of product availability. However, as Qwest has stated in its January 30, 2002 response Qwest believes that the CLECs have clearly expressed their interest during the CMP Redesign meetings in prioritizing all additions of functionality and products to SATE independently of IMA CRs. This separate prioritization provides the CLEC community with the flexibility to implement SATE specific changes ahead of other IMA functionality (for example, implementing flow through before a new product that no CLEC is planning to use in production). Qwest supports this CLEC desired process and believes the process should be adhered to.”*

In its March 26, 2002 response, Qwest further stated its position by stating:

*“The attached meeting minutes from the SATE Users Group on February 26, 2002 clearly indicates the CLECs desire to prioritize SATE CRs independently from IMA CRs. Additionally, the CLEC community has adopted this position, incorporating it into the CMP Master Redline document (see section 9.0 PRIORITIZATION). This process will be followed going forward.”*

KPMG Consulting observed the SATE User Group meeting on February 26, 2002, and reviewed the meeting minutes that were attached with Qwest’s March 26, 2002 response. KPMG Consulting recognized through its observation and review of the meeting minutes that SATE users had many questions regarding the separate prioritization of SATE CRs. Participants needed clarification about the process that would be employed to prioritize SATE and SATE impacting CRs. However, it is not clear from the minutes that CLECs have expressed the desire to have the SATE CRs prioritized separately but rather that this was how Qwest presented the SATE enhancement decision-making process. Additionally, since only two CLECs and one service provider have actively participated in the SATE User Group meetings, it is misleading to extrapolate the conclusions drawn in those meetings to the entire CLEC community.

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In its review of Section 9.0 of the *Master Redlined CLEC-Qwest CMP Redesign Framework* document updated on March 27, 2002, KPMG Consulting noted that the first sentence states, “*Each OSS Interface and Test Environment release is prioritized separately.*” Additionally, the document states in Section 9.2.1, “Prioritization Review”, that the prioritization objectives are to:

- Introduce newly initiated CLEC and Qwest OSS interface and test environment change requests.
- Allow CLECs and Qwest to prioritize eligible OSS Interface or test environment change requests by providing specific input as to the relative importance that CLECs, as a group, and Qwest assign to each such change request.

Beyond these generic references, there is no explicit, detailed documentation describing the process for separately voting and prioritizing SATE and SATE impacting CRs. Furthermore, KPMG Consulting would expect that prioritization results for features of upcoming IMA releases could have an impact on prioritization of SATE. Therefore, it is not definitively clear that the CLEC community has adopted this approach, and subsequently incorporated it into the CMP documentation.

KPMG Consulting believes that separate prioritization of SATE CRs does not address the fundamental issue that was raised in Point #2 of this Exception. If a product is not currently supported in SATE and a CLEC decides to offer the product to its customers, then the CLEC will not be able to test that product in SATE. Instead, the CLEC must submit a request to add the functionality to SATE through CMP. The proposed CR may not be implemented until several releases of SATE have been developed and deployed. Therefore, the CLEC is unable to test the product and offer it to its customers during its current EDI implementation. Without a process for rapidly including product functionality into SATE, Qwest is placing CLECs at a competitive disadvantage relative to EDI product testing capabilities.

**KPMG Consulting recommends that Exception 3095 remain open pending resolution of the identified issues.**

*Attachment(s):* None