

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of the
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST Communications,
Inc.'s Statement of Generally Available Terms
Pursuant to Section 252(f) of the
Telecommunications Act of 1996

Docket No. UT-003040

**QWEST CORPORATION'S REPORT ON THE
STATUS OF CHANGE MANAGEMENT
PROCESS REDESIGN**

Qwest Corporation provides this status report regarding the meetings it has held with CLEC representatives regarding the redesign of Qwest's Change Management Process ("CMP"). As in the past, Qwest proposes that CLECs and other parties to this proceeding be given a reasonable amount of time to file comments on this report, including comments regarding impasse issues identified in the report, if any. In addition, Qwest circulated a draft of this report to the CLECs that participate in the CMP redesign effort to allow them to comment on its content prior to filing. Qwest has incorporated many of the CLEC comments it received.

I. BACKGROUND

CLEC and Qwest representatives have met for more than 37 days over the past nine months to discuss every aspect of Qwest's CMP. As a result of this extensive collaboration, Qwest and the CLEC community have reached agreement on all substantive aspects of Qwest's CMP.¹

In prior status reports, Qwest reported that these issues included the following:

- scope of CMP;
- escalation and dispute resolution processes for the CMP;
- processes for systems change requests ("CRs") submitted by CLECs;

¹ Qwest has established a web site where it has posted the redesign meeting minutes and other materials. The web site address is www.qwest.com/wholesale/cmp/redesign.html. The minutes for the redesign meetings held on March 18-19, 2002, which are attached as Exhibit C, are currently in draft form. Once finalized, these minutes will be posted on the web site. The agreements reached are interim-draft agreements, subject to the CMP participants reviewing the final "Master Red-lined Document" and agreeing that the individual agreements on the various issues are consistent and appropriate when viewed in the context of the entire document.

- processes for product and process CRs submitted by CLECs;
- interim exception processing for OSS interfaces, product, and process changes;
- process for introduction of a new OSS interface;
- process for changes to existing OSS interfaces;
- process for retirement of an OSS interface;
- process for interface testing;
- process for CMP meetings;
- production support processes, including a technical escalation process;
- prioritization of systems CRs; and
- special change request process (agreement in principle).

At the March 5-7, 2002 redesign meeting, Qwest and the CLEC community agreed upon an approach for identifying and resolving the remainder of the significant CMP issues that relate to Qwest's application for Section 271 relief and the role of the CMP in connection therewith. The approach was designed to allow the parties to identify the most important issues and to then reach agreement in principle or impasse on those issues by April 4, 2002.²

The process the parties agreed to employ to identify and resolve the important issues allowed CLECs to raise any and all issues they believe are significant. The parties began with the list of the List of Priority CMP Issues submitted by AT&T. The parties assigned each of the AT&T issues to one of three categories, as follows: Category 1 denotes issues that required more discussion and may become an impasse issue; Category 0 denotes issues that required some discussion and most likely would not reach impasse; and Category X denotes issues that required no further discussion. Using this process, the parties determined that there were twelve Category 1 issues, ten Category 0 issues, and two Category X issues since the parties clearly were at impasse on the issue or were in full agreement. Both Covad and WorldCom concurred with the issues that were identified by AT&T and raised additional concerns relating to the addition of a provision in the CMP to allow for exceptions to the standard process, retail-wholesale parity, and the CMP improvement implementation matrix.

² Qwest has committed to continue holding the redesign sessions until the parties have finalized the detailed provisions to describe their agreements and include them in the Wholesale CMP Agreement, and to address any other unresolved issues. The schedule of redesign meetings, including proposed subjects, is attached as Exhibit D.

The parties agreed to first discuss the twelve issues in Category 1, which were relatively more important and might reach impasse. These issues were then prioritized. Each party ranked the issues in order of importance, and the rankings for each issue were averaged. This process produced a list of the twelve issues ranked in descending order of importance as voted on by all parties, including Qwest, at the redesign meetings. To efficiently identify any impasse issues, the parties agreed to attempt to reach agreement in principle regarding each issue and to defer crafting detailed language until all of the Category 1 issues had been discussed.

The redesign team was very successful in using this approach. All of the Category 1 and 0 issues were discussed and no impasse issues were identified. The parties reached agreement in principle regarding all twelve of the twelve Category 1 issues and eight of the ten Category 0 issues.³ The remaining two Category 0 issues, Covad Issue #3 and WorldCom, do not relate to language that will be incorporated in the CMP document. Covad Issue #3 relates to how Qwest identifies retail changes that may impact CLECs and the WorldCom issue relates to how Qwest will prove that it has implemented the changes it has agreed to make. The parties agreed that those Category 0 issues will not result in impasse.

The parties' agreements are summarized in the Qwest-CLEC Change Management Process Concepts Agreed Upon through the April 2-4, 2002 Redesign Session in Response to AT&T's, Covad's and WCom's Priority Lists ("Agreed Concepts Report"), which was prepared by the independent facilitator for the redesign sessions. The Agreed Concepts Report is attached as Exhibit B.

Thus, the redesign team successfully identified, discussed, and reached agreement in principle on virtually all of the issues that the CLECs identified as the most important. The parties also made substantial progress in agreeing to language that memorializes many of those agreements in principle. Most importantly, the redesign team agreed that none of the issues discussed will result in impasse.

II. THE REDESIGN TEAM HAS MADE SIGNIFICANT PROGRESS SINCE THE LAST STATUS REPORT

The agreements reached since the last status report are summarized below.

³ The list of Category 1 and 0 issues is attached as Exhibit E.

Qwest-Initiated Product/Process Change Process. The parties have now reached agreement regarding a detailed Interim Qwest-Initiated Product/Process Change Process.⁴ This process contains five tiers of processes, called "levels," differentiated by the expected impact of changes on CLECs. Each level includes an exclusive list of the categories of changes to which the processes for that level apply. As the introductory note in that document states, the parties agreed that Qwest would implement the interim process, which Qwest did for new changes that are initiated on or after April 1, 2002, but not for changes on which work was already in process before April 1, 2002. At the same time, the CMP redesign team agreed to continue to work to refine the categories of changes to which each process level applies. Qwest and the CLECs expect that this effort will be completed by April 16, 2002, after which CLECs and Qwest will baseline the process, and it will be incorporated into the Qwest's Wholesale Change Management Process Document ("Wholesale CMP Document").

The interim process classifies Qwest-initiated changes into five groups, labeled Levels 0-4, which are summarized below.

- Level 0 is defined as "changes that do not change the meaning of documentation and do not alter CLEC operating procedures" and includes changes such as font and typeface changes, punctuation, and grammatical corrections.
- Level 1 is defined as "changes that do not alter CLEC operating procedures or changes that are time critical corrections to a Qwest product or process," and includes changes such as time critical corrections to information that adversely impacts CLECs' ability to conduct business with Qwest and corrections/clarifications/additional information that does not change the product or process.
- Level 2 is defined as "changes that have minimal effect on CLEC operating procedures," and includes changes such as contact information updates and changes to a form that do not introduce changes to the underlying process.
- Level 3 is defined as "changes that have moderate effect on CLEC operating procedures and require more lead-time before implementation than Level 2 changes," and includes changes such as NC/NCI code changes and adding new features to an existing product.
- Level 4 changes are defined as "changes that have major effect on existing CLEC operating procedures or that require the development of new procedures," and include changes such as interval changes and new processes related to product enhancements.

⁴ This process is attached as Exhibit F and is also posted at the following URL:
<http://www.qwest.com/wholesale/cmp/whatiscmp.html>

Each level defines a different process for changes falling within that level. For Level 0 changes, Qwest does not provide notification or track the change on a history log; changes are made and immediately posted to the web site. For Level 1 changes, Qwest provides a notification to CLECs showing the text change by highlighting the language and a history log tracking the change; there is no comment cycle for such changes. For Level 2 changes, Qwest provides a notification to CLECs describing the change at least 21 calendar days in advance of the change. There is also a comment cycle, which provides for CLECs to submit comments and Qwest to reply to those comments prior to implementation of the change. For Level 3 changes, Qwest provides a notification to CLECs describing the change at least 31 calendar days in advance of the change. There is also a comment cycle, which provides for CLECs to submit comments and Qwest to reply to those comments prior to implementation of the change. Qwest will implement Level 3 changes no sooner than 15 calendar days after providing its response to CLEC comments. Thus, the implementation date for Level 3 changes is 31 to 45 days from the initial notification, depending upon when Qwest responds to CLEC comments.

Level 4 changes, which have the most impact on CLECs, require Qwest to submit a CR describing the proposed change. The CR is then presented at the monthly product/process CMP meeting for discussion with CLECs. Together, CLECs and Qwest will develop a process for Qwest to obtain CLEC input regarding the proposed change, which may include conferences or written comment cycles. After obtaining CLEC input in accordance with the process agreed at the monthly product/process CMP meeting, Qwest will modify the CR, if necessary, and design a solution. Qwest will then provide notification to CLECs of the planned change at least 31 calendar days prior to implementation. It is important to note that this notification is not issued until after Qwest and CLECs have discussed Qwest's CR, CLECs have provided input pursuant to the agreed process, and the CR is modified, if necessary. At this point, the process provides for a comments cycle similar to that for Level 3 changes, which results in an implementation date of 31-45 days from the date of the notification.

For Levels 2 through 4, where Qwest provides responses to CLEC comments, any CLEC that does not accept Qwest's response may elect to escalate the issue or pursue dispute resolution in

accordance with the CMP escalation and dispute resolution provisions.

The description for each of the Levels 1-4 sets forth a list of the categories of changes that fall under that level. If a particular category of change is not listed under Level 0-4, Qwest will issue a Level 3 notification. As described above, Level 3 notifications provide for a comment cycle and 31 to 45 calendar days of notice prior to implementation of the change. Qwest and CLECs will discuss any requests to change the level under which a noticed change falls or to establish new change categories under Levels 0 through 4 at the monthly CMP meeting. If the parties do not reach agreement regarding such a request, the issue will be determined by a majority vote.

Changing the CMP (Section 7.1). The parties reached agreement in principle regarding the process for making changes to the change management process itself. The parties agreed that the initiator of the request for a change will propose redlined language and provide the reasons for the request at least 14 days in advance of the monthly product/process CMP meeting. At that monthly meeting, the initiator will present the proposal to the CMP participants and those parties will develop a process for providing input into the proposed change. Changes to the CMP will be made only upon unanimous agreement. A requested change to the CMP will be voted on no earlier than the monthly CMP meeting following the meeting at which it was presented.

Conflicts between CMP changes and interconnection agreements. The parties reached agreement on language to clarify that a CLEC's interconnection agreement prevails over changes made through CMP. The parties agreed to add the following language to the Introduction and Scope (Section 1):

In cases of conflict between the changes implemented through the CMP and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement. In addition, if changes implemented through the CMP do not necessarily present a direct conflict with a CLEC interconnection agreement, but would abridge or expand the rights of a party to such agreement, the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such agreement.

OSS Interface Release Calendar. The parties agreed to add the following language as a new

Section 6 to address Qwest's rolling 12 month OSS Interface release calendar:

Qwest will provide a rolling 12 month OSS Interface release calendar in the distribution package of the first scheduled CMP Systems Meeting of each quarter. The calendar will show release schedules, for all OSS Interfaces within the scope of CMP starting in that quarter and for a total of 12 months in the future. The schedule entries will be made when applicable for application to application interfaces:

- Name of OSS Interface
- Date for CMP CR Submission Cutoff
- Date for issuing Draft Release Notes
- Date when Initial Notice for New Interfaces and Interface Retirements will be issued; date when comparable functionality will be available.
- Date for issuing Initial or Draft Technical Specifications
- Comment cycle timeline
- Prioritization, packaging and commitment timeline
- Date for issuing Final Technical Specifications
- Testing period
- Date for issuing Final Release Notes
- Planned Implementation Date
- Release sunset dates

The release calendar will be posted on the CMP web site as a stand-alone document.

Ranking of Late Added CRs. The parties agreed to add the following language as Section 10.2.4 addressing the ranking of late added CRs:

For those late added CRs that are eligible for inclusion, as a candidate, in the most recently prioritized release (Section 10.2.4), the prioritization process will be as follows.

- Within three (3) business days following the CMP Meeting that resulted in the decision to include the late added CR as a candidate in the recently prioritized release, Qwest will distribute the late added CR for ranking, along with the initial prioritization.
- Each CLEC and Qwest may submit a suggested rank for the late added CR. The suggested rank will be the number, from 1-n, corresponding to the position on the Initial Prioritization List that the CLEC or Qwest believes the late added CR should be inserted.
- CLECs and Qwest who choose to vote must return their suggested rank for the late added CR via e-mail within three (3) business days following Qwest's distribution of the late added CR for ranking.

Within two business days following the return of the suggested rank, Qwest will tabulate the results by averaging the returned suggested ranks for the late added CR. Qwest will insert the late added CR into the Initial Prioritization List at the resulting point on the list and will renumber the remaining candidates on the list based on this insertion. Qwest will e-mail

the newly resulting Initial Prioritization List to the CLECs. The results will be announced at the next scheduled CMP Monthly Meeting.

Definition of Terms. The parties agreed to a list of defined terms that was incorporated at the end of the Wholesale CMP Document.

Exception Process. The parties reached agreement in principle regarding the exception process to be included in the Wholesale CMP Document. Exception processing addresses situations in which a CLEC or Qwest wishes to deviate from the agreed process in any respect. For example, exception processing would apply to requests to deviate from the CMP's notice or comment intervals, to shorten the life cycle of a particular CR, or for an emergency software fix. A request for exception processing must be submitted in writing with substantiation of the reason the issue should be handled on an exception basis. The request must be based on good cause and must describe the targeted implementation date and any expected milestones the requestor would like to be met. With at least two business days notice, Qwest will hold an exception call/meeting to discuss the request. If there is sufficient time, the meeting will be held during the monthly CMP meeting. The decision regarding the exception will be made by majority vote.

II. THE AGREED PROCESS IS SET FORTH IN THE QWEST WHOLESALE CHANGE MANAGEMENT PROCESS DOCUMENT AND POSTED ON QWEST'S WEB SITE

Qwest and the CLEC community have now reached agreement on all major aspects of the change management process. Qwest has implemented that process and posted a document describing it on Qwest's wholesale web site.⁵ A matrix reflecting Qwest's implementation of the redesigned process is attached as Exhibit G. The parties have identified only one impasse issue, which was presented to the Colorado Commission on February 8, 2002. The Commission orally ruled against adding the OBF language to the definition of Regulatory Changes that would treat changes required to meet performance measures as Regulatory Changes. Qwest and the CLECs have agreed that this resolution will apply in all of Qwest's states.

Qwest's CMP addresses changes to systems, products, and processes. The redesign

⁵ Qwest's Wholesale Change Management Process Document, which is attached as Exhibit A, can be found at the following URL: www.qwest.com/wholesale/cmp/whatiscmp.html.

participants have attempted to define procedures to support all of these areas, but some work remains. Although some issues may remain relating to the change management process, all of the major issues that impact Qwest's application for Section 271 relief have been resolved. As noted above, Qwest remains committed holding redesign sessions after it receives section 271 approval for as long as necessary to resolve and/or close out any remaining issues. All parties understand that the CMP is a living process that will be subject to ongoing improvements.

The formal redesign process should end once the collaborative body has established a viable change management process. After the redesign process ends, the intent is to have developed processes that will address any future changes that are consistent with industry standards and allows substantial CLEC input on changes to Qwest's OSS, products, and processes.

III. CONCLUSION

Qwest appreciates the time and effort the CLECs have devoted to participating in the redesign of Qwest's CMP. Qwest is confident that the collaborative redesign process has produced an effective CMP that meets CLEC needs.

Dated this 16th day of April, 2002.

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