

EXCEPTION 3077 – DISPOSITION REPORT

Qwest OSS Evaluation

Initial Release Date: November 7, 2001
First Response Date: January 8, 2002
Second Response Date: January 24, 2002
Third Response Date: April 3, 2002
Disposition Report Date: April 15, 2002

EXCEPTION DISPOSITION REPORT

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

Exception:

Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs sufficient testing capabilities.

Summary of Exception:

KPMG Consulting observed, through interviews and documentation reviews, that the IMA EDI SATE does not provide sufficient testing capabilities for CLECs prior to connecting to Qwest's production systems. Certain limitations in the IMA EDI SATE were identified, including the following:

- SATE does not generate post-order responses in the same manner as they are created in the production environment.
- Flow-through orders are not supported in SATE, even though these types of orders will be processed in the production environment.
- The volume of order responses supported in SATE is restricted due to manual response handling.
- The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

A limited or insufficient testing environment could delay the timely implementation of a CLEC's IMA EDI release. Also, problems could arise in the production environment that may have otherwise been avoided if SATE more closely mirrored the production environment. These factors could increase a CLEC's operating expenses as a result of additional time required to ensure the functionality of the systems, and could inhibit revenues if testing delays hinder a CLEC's ability to service its customers.

Summary of Qwest's Initial and Supplementary Responses:

Throughout the course of the testing and in response to this Exception, Qwest addressed each of the identified issues as follows:

- (1) SATE does not generate post-order responses in the same manner as they are created in the production environment.*

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Qwest implemented an enhancement to SATE called the Virtual Interconnect Center Knowledge Initiator (VICKI) on January 28, 2002. VICKI was created to provide a method for CLECs to receive automated post-order responses in the test environment based on the request of the CLEC.

Qwest responded to the following issues related to VICKI:

- *VICKI response times may not match production response times*
- *VICKI response detail may not match production response detail*
- *VICKI does not support “real world scenario testing”*

Qwest addressed the first two issues by stating that it would modify the VICKI supporting documentation on April 15, 2002 to clarify the language that caused KPMG Consulting to raise the issues. For the remaining “real world scenario testing” issue, Qwest stated that VICKI is purposefully dissimilar from the production environment and is designed to allow CLECs to certify IMA EDI capabilities by making paths available to trigger the all of the necessary post order responses.

(2) Flow through orders are not supported in SATE

Qwest committed to implementing a test flow through system and test Service Order Processors (SOPs) in SATE. At the time that this Disposition Report was filed, Qwest was scheduled to implement the remainder of test flow through capabilities by May 20, 2002. Qwest implemented the test flow through capability for two types of orders, POTS and UNE-P POTS orders, in the Western region on February 22, 2002.

In response to a concern raised that flow through enhancements would not include all types of post order transactions, Qwest stated that the order completion or jeopardy is independent of whether an order was created by a service center representative or automatically with flow through. Qwest indicated that it could manually provide other responses, such as an order completion or jeopardy, for a flow through LSR if desired by the CLEC. Qwest believes that there is no limitation for a CLEC to test all desired responses with a potential flow through LSR.

(3) The volume of order responses supported in SATE is restricted due to manual response handling.

As part of the EDI Implementation Guide updates for 9.0 published on January 22, 2002, Qwest removed all references to the FOC limit in SATE. Qwest believes that these actions resolved the perceived post-order capacity restraint in SATE, as referenced by KPMG Consulting.

(4) The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

In response to KPMG Consulting’s examples of Qwest documentation and sample CLEC EDI test transactions that indicated that the SATE transaction responses were not consistent with those found in the production environment, Qwest asserted that SATE order responses are consistent with production responses even though the specific data within the responses may be different. SATE contains facilities, addresses, CSRs, and other data instances that do not exist in production. The type of data in SATE mirrors production data, but the SATE data instance is not

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identical to production data instances. For the specific examples provided, Qwest stated that three of the four examples differed from production because they were handled manually. With the implementation of VICKI, this was not expected to occur again.

Qwest further stated that all known differences between the IMA production environment and SATE are included in the Overview section of the IMA EDI SATE Data Document. Any case where SATE had to differ from production due to a functional requirement for SATE, the case was noted for inclusion in the Data Document. For future implementations in SATE, if a new functionality causes the system behavior to differ from production, this information will be added to the Overview section of the IMA EDI SATE Data Document.

Qwest also noted that the SATE PID (PO-19) helps to ensure that Qwest has a complete and accurate Data Document. On a monthly basis, the PID tests that the data in the Data Document reflects the data in the system. This helps CLECs to feel confident that a successful test in SATE will mean a successful move to production.

In its April 8, 2002 response, Qwest respectfully requested that KPMG close this Exception and categorize it as “Closed/Unresolved”.

KPMG Consulting’s Disposition Report (04/15/02):

Summary of KPMG Consulting’s Retest Activities and Results:

KPMG Consulting’s response for each of the issues identified is below.

(1) SATE does not generate post-order responses in the same manner as they are created in the production environment.

With the implementation of VICKI, KPMG Consulting acknowledged that Qwest provided CLECs with a method for receiving automated responses, but noted that VICKI had certain limitations. One of the identified issues was that VICKI does not support “real world scenario testing.” Without this capability, KPMG Consulting does not believe that VICKI provides CLECs an understanding of how different types of transactions will react in the production environment. Although VICKI helps CLECs to understand the EDI mapping structure and to determine if their systems can accept certain types of responses for the orders submitted, by design, it does not support complete interface testing capabilities. KPMG Consulting considers the real world scenario testing an essential element to a complete EDI testing environment.

(2) Flow through orders are not supported in SATE

Based on the proposed flow through enhancements, KPMG Consulting acknowledged that Qwest plans to address the issue of flow through capabilities within SATE. However, until the proposed enhancements are fully implemented, KPMG Consulting does not believe that the current test environment provides a CLEC with an accurate representation of the production environment’s flow through capabilities. Based on its review and the timeline for implementation, KPMG Consulting was unable to assess this proposed SATE enhancement.

(3) The volume of order responses supported in SATE is restricted due to manual response handling.

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KPMG Consulting acknowledged that the VICKI and flow through enhancements would diminish Qwest's use of human resources to support the test environment. By minimizing reliance on manual handling, Qwest could release the restrictions on the number of post order transactions that a CLEC could receive. KPMG also noted that Qwest had revised the documentation to remove any references to response generation limits and considers this issue to be resolved.

(4) The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

KPMG Consulting provided Qwest documentation and EDI transaction responses that indicated that post order response data may not be consistent with production. Qwest stated that manual handling caused many of the discrepancies and that the proposed SATE enhancements should rectify that issue. Qwest also affirmed that known differences are documented in the SATE Data Document. KPMG Consulting believes that documentation of known differences does not substitute for a test environment that mirrors the transactional behavior of the production environment.

KPMG Consulting was only able to observe limited commercial activity for SATE and only prior to the implementation of the VICKI and flow through enhancements. KPMG Consulting was unable to determine whether or not SATE produced consistent post order responses that accurately reflected the behavior and content expected for the same transactions in the production environment.

KPMG Consulting recommends that Exception 3077 be closed unresolved.