

EXCEPTION 3094 – DISPOSITION REPORT

Qwest OSS Evaluation

Initial Release Date: December 12, 2001
First Response Date: January 7, 2002
Second Response Date: February 12, 2002
Third Response Date: March 28, 2002
Disposition Report Date: April 4, 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 established change management process for notifying CLECs about a proposed change, and allowing input from all interested parties.

Summary of Exception:

The Qwest Product/Process Change Management Process (CMP) is the method used by both Qwest and CLECs to introduce and implement changes to Qwest wholesale products and business processes. The Qwest CMP managers are responsible for the administration of Change Requests (CRs) and Notifications, including changes to, and updates of, relevant Qwest documentation. The Qwest Subject Matter Experts (SMEs) are responsible for the products and processes associated with proposed changes.

KPMG Consulting observed an instance in which Qwest did not provide CLECs with complete information about, and a reasonable interval for, a CLEC-impacting CR. Qwest SMEs held meetings with CLECs but did not adequately address CLEC concerns. In addition, Qwest implemented the process change according to a pre-determined schedule despite CLEC objections. KPMG Consulting identified the following issues:

- Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;
- Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change;
- Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.
- Qwest, through the CMP, did not update CR status on a timely basis;
- Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.

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KPMG Consulting considered the fact that Qwest implemented CR PC100101-5 without taking into consideration CLEC objections, its failure to make available complete information sufficiently in advance of the scheduled change, as well as the subsequent impasse¹ about the process governing Qwest-initiated changes as indicative of lack of a defined and documented change management process.

Summary of Qwest's Initial and Supplemental Responses:

Qwest's initial position stated that Qwest and CLECs developed an *Interim Qwest Initiated Product/Process Change Request Initiation Process* during the early CMP Redesign Sessions. At the time Qwest issued the CR in question, Qwest believed that the interim process might apply to the testing process clarification and, therefore, in good faith, submitted a CR. CLECs later stated that the interim process was only intended for changes stemming from 271 testing efforts. Therefore, Qwest did not believe that it was necessary for it to submit a CR, as this change was not under the scope of the interim process.

During the course of OSS Testing, Qwest and CLECs have engaged in a collaborative process to change and enhance the Qwest Change Management Process (officially referred to as CMP Redesign). As the CMP Redesign continued, Qwest recognized the fact that Qwest and CLECs were at impasse over the process that governs Qwest-initiated Product/Process changes. Qwest implemented an *ad hoc* process (also referred to by Qwest as the *Interim Qwest-Initiated Product/Process Change Management Process*) on April 1, 2002 to manage Qwest-initiated Product/Process changes.

In addition, the redesign team agreed that Qwest and CLECs would continue to evaluate and modify that process. The redesign team has begun to review product/process notices issued over the last few months in order to make the list of categories in each of the four "Levels" of product/process changes more exhaustive. As of the time that this Disposition Report was filed, the redesign team was working to try to finalize this initial effort by April 16, 2002. After this review, CLECs and Qwest will baseline the interim process. Qwest will then insert it into the Qwest Wholesale Change Management Process Document and implement the process, as modified. Qwest's response from April 3, 2002 also indicates that CLECs and Qwest have agreed to implementation of this process with changes occurring on an 'as needed basis only' as Redesign discussions continue.

¹ KPMG Consulting observed that Qwest and CLECs were at impasse about Qwest-initiated Product/Process changes from December 2001 to March 2002.

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

Summary of KPMG Consulting’s Retest Activities and Results:

KPMG Consulting recognizes that Qwest and CLECs have yet to agree on key components of a comprehensive Product/Process CMP. Qwest implemented an *ad hoc* process to manage Qwest-initiated Product/Process changes as of April 1, 2002. Although CLECs and Qwest have reached an “agreement in principle” for this interim process, it is KPMG Consulting’s understanding that the referenced process remains subject to further development, modifications, and negotiations in CMP Redesign. KPMG Consulting is not able to conduct a thorough evaluation until the prescribed process is formalized, the Redesign sessions are complete, and the process is fully implemented and confirmed. However, the current schedule is for Redesign meetings to continue until June, 2002.

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.

KPMG Consulting recommends that Exception 3094 be closed unresolved.