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EXCEPTION 3095 – DISPOSITION REPORT
Qwest OSS Evaluation

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

EXCEPTION DISPOSITION 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.

Summary of Exception:

KPMG Consulting 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 wholesale products. SATE only supports a subset of the products and transactions that are available in the IMA production environment. Therefore, KPMG Consulting raised the specific issue that SATE does not accurately and comprehensively represent Qwest's production environment. This potentially prohibits CLECs from testing any desired product before migrating to the production environment.

Additionally, 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) issued through the Change Management Process (CMP). Once the CR is submitted, it needs to be discussed and prioritized within the parameters of the CMP. Given the current schedule for CMP and implementation of major releases, the requesting CLEC(s) may have to wait several months for a new release before the requested products can be included in SATE's functionality. Therefore, the CLEC(s) cannot test all of its products for the current IMA release.

By not providing for testing of all of Qwest's available products in SATE, and by not being able to quickly incorporate those products into the test environment, CLECs are not able to sufficiently test all of the products that they can sell to their customers.

Summary of Qwest's Initial and Supplementary Responses:

In its first response, Qwest stated that any product that a CLEC had implemented into production or was in the process of testing was included in the initial deployment of SATE. This ensured that when SATE was placed into production, it would support those products that the CLECs

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needed to be able to use SATE to migrate to the next release. Qwest also stated that CLECs had not expressed a desire to add new products in either the CMP forum or at the SATE User Group meetings that began in November 2001. Furthermore, as part of the CMP Redesign process, Qwest and the CLECs discussed the development of 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 implemented 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.

In its January 30, 2002 response, Qwest stated that CLECs wish to prioritize all SATE functionality, including the addition of new products, through the Change Management Process. In support of this position, Qwest created Change Requests (CRs) for the IMA products that SATE does not currently support. These changes were presented to the CLEC community for prioritization on March 21, 2002. In addition to putting into practice a separate SATE prioritization process, Qwest also asked CLECs to vote “Yes” or “No” on accepting each CR as a desired change and implementing the associated functionality. Qwest provided the results of the prioritization vote in its April 5, 2002 response. Based on those results, Qwest believes that CLECs have demonstrated that it is acceptable for SATE to support less than 100% of the products and transactions available in the production environment. Qwest plans to continue to separately prioritize SATE and to update the Master Red Lined CMP Document to reflect the separate SATE prioritization process.

Qwest stated that even without the availability of a product in SATE, a CLEC has the ability to implement the product in EDI using the Interoperability environment and the associated testing process. Through that mechanism, CLECs are able to test all of the products for the current IMA release.

In its April 5, 2002 response, Qwest respectfully requested that KPMG close this Exception and categorize it as “Closed/Unresolved”.

KPMG Consulting’s Disposition Report (04/11/02):

Summary of KPMG Consulting’s Retest Activities and Results:

KPMG Consulting acknowledged that Qwest had worked in collaboration with the CLEC community when initially developing SATE and setting up user group meetings to enhance SATE. Although Qwest committed to working with CLECs, KPMG Consulting noted that the test environment does not precisely and accurately reflect the offerings of either the production environment or of a new release of the production environment. Additionally, the process for adding new functionality to SATE is onerous and untimely for a CLEC expecting to test unsupported functionality during its EDI implementation. KPMG Consulting cited examples of new SATE functionality requests from CLECs to show that CLECs may need to test products that are not included in the current version of SATE. KPMG Consulting also indicated that the Bona Fide Request process proposed by Qwest through the Redesign process would not be finalized or available until the Redesign efforts had been completed.

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KPMG Consulting stated that the use of the Interoperability environment for testing products not currently supported in SATE did not sufficiently address the issues raised in this Exception. Several limitations had been identified regarding the Interoperability environment in Exception 3029. Additionally, Qwest had stated that it would only invest resources to further develop SATE, and that SATE would overcome the deficiencies of Interop as a testing environment. Based on these facts, KPMG Consulting did not believe that Interop provided CLECs with a suitable alternative for testing products not supported in SATE.

KPMG Consulting reviewed Qwest's April 5, 2002 supplemental response and data items, and acknowledges the request to close this Exception and categorize it as "Closed/Unresolved".

KPMG Consulting recommends that Exception 3095 be closed unresolved.