
**Hewlett-Packard's Comments on Qwest
Response to Recommendations for**

Qwest IMA-EDI SATE Evaluation

Arizona Corporation Commission - Qwest



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Recommendation Response

External Draft Release
Version 1.0
Date Prepared: February 14, 2002

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Document Information

Project Name:	Qwest IMA-EDI SATE Evaluation	Draft Status:	External Release
Project Manager:	Curt Carland	Document Version No:	1.0
		Document Version Date:	2/14/02
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Distribution List

From	Date	Phone/Fax	
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To	Action*	Due Date	Phone/Fax
ACC Staff	Review, Action Required		
Qwest	Review, Action Required		

* Action Types: Approve, Review, Inform, File, Action Required, Attend Meeting, Other (please specify)

Version History

Ver. No.	Ver. Date	Revised By	Description
1.0	2/14/02	Bill Koerner	External Draft

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1. Overview

1.1. Summary

In connection with the Arizona 271 testing effort, the Arizona Corporation Commission (ACC) and Qwest commissioned Hewlett-Packard (HP) to evaluate its IMA-EDI Stand Alone Test Environment (SATE). HP issued a report that found the SATE was adequate to support CLEC testing. However, the report contained nine recommendations aimed at ensuring that the SATE would remain adequate. Without complete and full implementation of these recommendations, continued adequacy of the SATE cannot be assured. Therefore, HP will undertake an evaluation of Qwest's implementation of the nine recommendations. This document provides a preliminary review of Qwest's response to the recommendations and details the steps HP will take to ensure that the recommendations are properly implemented and that the SATE remains adequate in the future.

1.2. Background

As an extension to the Arizona 271 testing effort, the Arizona Corporation Commission (ACC) and Qwest commissioned Hewlett-Packard (HP) to evaluate its IMA-EDI Stand Alone Test Environment (SATE). HP's primary objective was to provide the ACC, Qwest and the CLEC community with an evaluation of SATE that was unbiased, factual and representative of the experience that a CLEC would face in using SATE for EDI Certification testing to establish an IMA-EDI interface with Qwest. In addition, HP's objective was to determine whether the SATE provides an adequate means of testing and support to CLECs seeking to compete in the Arizona marketplace.

HP developed a Summary Evaluation Report of that evaluation, including nine recommendations to Qwest, and presented it to the ACC, Qwest and the CLEC members of the Technical Advisory Group (TAG) on December 21, 2001. In accomplishing its objective and developing that report, HP performed the following general steps:

- Met with ACC personnel to understand the regulatory objectives of this engagement
- Solicited feedback of both Qwest and CLEC personnel regarding their experience and opinions of the SATE for EDI development and interoperability testing. This was accomplished utilizing a CLEC Input Questionnaire.
- Reviewed formal comments filed by parties in connection with the SATE.
- Examined Qwest CLEC documentation for adequacy, and used this documentation to establish and test the appropriate EDI interconnection.
- Used Qwest CLEC documentation to develop a suite of transactions to test in the SATE environment.
- Conducted SATE functionality testing using the documentation and processes that would be available to CLECs.
- Communicated issues and questions to Qwest, the ACC and CLECs.
- Conducted re-testing of corrective actions implemented by Qwest in response to issues and questions.

Based on that report, Qwest and the CLEC members of the TAG provided comments. Qwest, as directed in that report, provided responses to HP's nine recommendation for improving the effectiveness of SATE. This document reviews the responses provided by Qwest, and addresses the effectiveness and impact of those responses to the initial recommendations.

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1.3. Purpose of the Document

The purpose of the SATE Recommendation Response document is to provide a review of the responses provided by Qwest to HP's nine recommendations described in the SATE Summary Evaluation Report. For each response, HP will provide its opinion of the completeness and applicability to the recommendations proposed by HP. This review will also be used as input to the scope of effort to be executed by HP in the New Release Test for SATE 9.0.

1.4. Scope

The scope of this document includes only the responses to HP's nine recommendations in its Summary Evaluation Report, and HP's opinion as to the completeness and applicability of those responses.

1.5. Audience

This document is intended for use by the ACC, Qwest, and the CLEC members of the TAG to understand HP's evaluation and opinion of the responses provided by Qwest.

1.6. References

The following Qwest documents are referenced throughout this document:

- EDI Implementation Guide - v 9.0 released 1/21/02
- EDI Data Document
 - IMA EDI Data Document version 9.04 – for the Stand Alone Test Environment (SATE), Monday, February 4, 2002 effective in SATE now
 - IMA EDI Data Document version 9.05 – for the Stand Alone Test Environment (SATE), Monday, January 28, 2002 effective in SATE on 2/25/2002
- EDI BPL Edits List - IMA EDI 9.0 Errors List (9.0 Errors List V2.doc) released 1/30/02
- EDI Legacy System Edits List - SATE Legacy System Errors V2 - SATE90ERRORLIST Ver2 released 02/04/02
- Change Management Process (CMP) website: www.qwest.com/wholesale/cmp

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2. Review of Responses

The following table summarizes the responses provided by Qwest to HP's nine recommendations in its Summary Evaluation Report for SATE.

Rec. #	HP Recommendation ¹	Qwest Response ²	HP Comments
1	<p>HP recommends that Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.</p>	<p>Qwest currently has forums and processes in place to address this recommendation. As a starting point, SATE was implemented supporting all products and associated transactions for which CLECs are currently certified to use in Qwest IMA EDI.</p> <p>To address CLEC's future needs, Qwest implemented a process by which CLECs can request the addition of products to SATE. This process states "...additional functionality can be agreed upon and added in later releases. Requests for transactions not currently supported may be requested via CMP". Currently, two CMP CRs are open based on CLEC product requests: Line Splitting and Loop Splitting. Based on the process described above, Qwest will utilize the CMP CR prioritization process to add the new products to SATE.</p> <p>In addition to the CLEC process, 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. Qwest agreed to add Unbundled Distribution Loop and Unbundled Distribution Loop with Number Portability as the products to be added to SATE for HP's new product evaluation, as Qwest anticipated future EDI implementations of these products. Also, Facility Based Directory Listings will be added as</p>	<p>HP examined the Qwest CMP website (www.qwest.com/wholesale/cmp/changerequest/html) to determine if a CLEC could request a change to SATE. Currently, there is no formal process in place for SATE as part of the existing CMP. The CMP location on the Qwest Web site does reference SATE as a part of the CMP Change Request Form, but as an Interface impacted by the change, not the focus of the change itself. The Change Request Form also does not describe how the SATE requests will be cared for under the CMP organization. It is unclear how Qwest makes the decisions as to what is scheduled to be part of SATE and there is allowance for a CLEC to "ASK" for a product update, however, the process steps are not specifically laid out for a SATE Change Request.</p> <p>Qwest also does not clarify what or how they decide what new release updates are made or will be made to the SATE. These updates may include the IMA EDI capability of New Products; however, it is unclear how these updates are</p>

¹HP SATE Summary Evaluation Report For Qwest IMA-EDI SATE, Arizona Corporation Commission ; Final Release, Version 3.0, Release Date: 12/20/01

²IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996, Docket No. T-00000A-97-0238, Qwest's RESPONSE TO HP's SATE RECOMMENDATIONS

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		<p>an IMA product with the 9.0 release. As a result, Qwest is creating a CR to add Facility Based Directory Listings to SATE.</p> <p>Qwest believes that its published process meets the needs of the CLEC community and through CLEC input Qwest is committed to continue meeting CLECs' needs.</p>	<p>carried over to SATE.</p> <p>HP recommends that these processes have to be clearly defined and identified in both the SATE as well as CMP documentation to ensure a satisfactory testing environment.</p> <p>HP further recommends that Qwest continue to develop the process documentation, based upon standardized process methodology (Qwest standard, if available), which should include:</p> <ul style="list-style-type: none"> • A stated objective, such as implementation of new products or technologies into the SATE environment, • a description of the inputs/deliverables required by CLECs, • the outputs/deliverables produced by Qwest, • the tasks and activities executed in that process, • the resources (people, technology, documentation) required to support that process, • the constraints, dependencies and trigger points to completing the process. • and the measurements used to ensure the process is meeting the stated objectives. <p>This approach more clearly identifies what is required of CLECs in interacting with Qwest's SATE, what it can expect Qwest to do, and a way to validate that both parties are meeting the objective and results of the process.</p>

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			<p>Additionally, HP recommends that Qwest pursue an independent evaluation of that process to ensure an unbiased assessment of its compliance to process standards and effectiveness.</p>
2	<p>HP recommends that Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation.</p>	<p>Qwest follows documentation quality and versioning control processes for all externally published documentation, including SATE. During HP's SATE evaluation, Qwest chose to go outside the standard documentation-publishing schedule and processes in an effort to be responsive to HP's issues. Qwest believes this observation is a result of HP's evaluation requests and not indicative of Qwest's standard processes.</p> <p>However, Qwest will externally publish the guidelines that detail the release management, version control, and quality assurance processes that Qwest employs for the issuance of SATE documents. These guidelines will be published in the SATE Data Document by January 15, 2002, which will be available on the Qwest Wholesale web site at URL: http://www.uswest.com/wholesale/ima/edi/document.html.</p> <p>Qwest current documentation processes support the production of documents that enable CLECs to properly utilize SATE.</p>	<p>HP supports Qwest's decision to externally publish the guidelines that detail the release management, version control, and quality assurance processes that Qwest employs for the issuance of SATE documents.</p> <p>HP did an initial review of the updated SATE Data Documents. The Release Management Process and Quality Assurance Plan, as published, consists of two paragraphs of text found in the latest version of the SATE Data Document. These two paragraphs appear to address guidelines, but inadequately address both process definition and quality assurance, as described in Recommendation 1. Recommendation 2 was made to ensure that Qwest has Release Management and Quality Assurance for all IMA-EDI documents that affect the use of SATE such as the Data Document, the IMA-EDI Implementation Guide, Disclosure Documentation, etc. HP did not review Qwest's standard process for document quality, thus can not state whether it has one, or that it was or is followed to produce SATE documentation.</p> <p>HP recommends that the updated documentation and processes be formally evaluated for adequacy and compliance (as specifically</p>

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			described in the comments for recommendation 1).
3	<p>To ensure continued adequacy of the SATE, HP recommends:</p> <ul style="list-style-type: none"> • That Qwest clearly and specifically identify the roles and responsibilities of each individual and organization involved in the SATE. This definition of roles and responsibilities should include goals and objectives and mission statements for each organization and for all personnel. In addition, the job description for each employee should be clearly defined • That Qwest develop a system of internal controls to ensure accountability for organizations and individuals involved in the SATE process. These controls should use clearly defined goals and objectives and should tie specifically to functional responsibility, such as quality of documentation, accuracy of test account data, mirror image of production, etc. Employees involved in the 	<p>In response to the first two bullet points of this recommendation, Qwest is developing a staffing plan which details Qwest's CLEC testing organizational structure and the roles and responsibilities of all resources that directly support the organization. Additionally, this documentation will include objectives of the organization and the processes in place to ensure accountability. This plan will be maintained as part of Qwest's IMA EDI Implementation Guidelines, and will be published with version 9.0 of the guide, scheduled for release on January 21, 2002.</p> <p>For the third bullet point of this recommendation, Qwest is developing the process flow documentation as recommended by HP. This information will be maintained as part of Qwest's IMA EDI Implementation Guidelines document, and will be published with version 9.0 of the guide, scheduled for release on January 21, 2002.</p> <p>These documentation process measures will ensure the continued sufficiency of SATE in meeting the stated goals of the test environment.</p>	<p>This recommendation focused on the fact that Qwest relies heavily on resources to support CLECs in using SATE documentation to establish connectivity to and use SATE. Thus, HP must ensure that Qwest has a way to continue to staff at that level going forward. HP has reviewed the updated IMA-EDI Disclosure Document, and it is HP's opinion that Qwest has only partially implemented the recommendations related to process and documentation gaps and exceptions. As Qwest was informed, the recommendations were based on the SATE processes and documentation meeting MINIMUM STANDARDS for business processes and related documentation.</p> <p>HP acknowledges that in attempting to implement the recommendations, Qwest made some progress at developing the content needed to meet the requirements of the recommendations. HP, however, cannot give Qwest an adequate rating for documentation and process unless the recommendations are implemented to the criteria presented with the recommendations (the criteria is representative of CMM, American Society for Quality and Baldrige process criteria). Qwest does not have to embrace a particular criterion, however, HP believes it does need to meet the basic process and documentation standards that are common to ALL accepted criteria (all standard business</p>

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Rec. #	HP Recommendation ¹	Qwest Response ²	HP Comments
	<p>SATE should be encouraged to accomplish these goals and objectives</p> <ul style="list-style-type: none"> • That Qwest develop process flow documentation that accurately reflects actual SATE processes and is a reliable guide to CLECs using the SATE 		<p>process criteria addresses the same basic attributes and includes the same standards).</p> <p>Therefore, HP will conduct an analysis to ensure the accuracy, completeness and effectiveness of the SATE processes and documentation related to:</p> <ul style="list-style-type: none"> • Organization and Role definitions • Goals and Objectives • Mission statements • Job descriptions • System of internal controls • Process flowcharts and related documentation <p>HP suggests that instead of a separate process and documentation evaluation, HP will address these two aspects of SATE simultaneously. HP is currently developing a plan for this analysis, and currently does not have an anticipated completion date.</p> <p>Additionally, business process evaluation guidelines dictate that when new process documentation is introduced or an existing process is significantly changed, an evaluation should be performed to prevent the introduction of problems that previously did not exist. HP recommends that the updated processes be formally evaluated.</p>
4	HP recommends that Qwest publish a list of variances between SATE and production	Qwest believes this recommendation is specific to the Errors List process for SATE. The Qwest IMA EDI Errors List contains all errors generated by the IMA system. The Business Processing	To clarify, HP's recommendation is aimed at concluding that SATE mirrors the IMA-EDI production environment. To the extent that

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	<p>business edits to ensure that CLECs are fully aware of any such discrepancies so that a CLEC may effectively develop their business processes in this 'simulated' environment. This list should become a permanent part of the SATE documentation library.</p>	<p>Layer (BPL) used by SATE is the same as the BPL used by IMA. Thus, the IMA Errors List for SATE is the same as the IMA Errors List for IMA. However, this list does not contain errors generated by Qwest's legacy systems. When an error message is produced by a legacy system, the IMA BPL simply passes the error message to the CLEC, which requires no processing to be performed by IMA. SATE includes all errors possibly generated by IMA, as well as commonly triggered legacy system errors.</p> <p>As only the common legacy system errors are found in SATE, Qwest will create a list of all legacy system error messages coded into SATE. This will allow a CLEC to understand which error messages are available through SATE. A note will be included on this document to explain that additional legacy system errors can be coded into SATE if requested. This request can be made using the data request process.</p> <p>Additionally, Qwest will provide a list of errors from those legacy systems whose errors were returned through Qwest's 8.0 production EDI interface during a 6-month period. Qwest will compare this list to the errors currently contained in SATE and will publish that list and discuss in the CMP forum.</p> <p>Before putting a process in place to maintain this list ongoing, Qwest will gain input from CLECs through the CMP process and jointly assess the value of maintaining this list ongoing. Based on that joint assessment, a decision will be made on whether to implement an ongoing process. Since the IMA EDI Errors list is generated from a system query, errors from sections of code that are no longer executable are included in the list. Beginning with the 9.1 release, Qwest will ensure that these error messages are removed from the code. As a result, these non-executable errors will no longer appear on the IMA EDI Errors list. With IMA EDI</p>	<p>SATE is not a replica of the IMA-EDI production environment, Qwest must indicate to the CLECs and third parties developing to the Qwest IMA-EDI interface the differences between the two systems. These potential differences consist of not only Legacy System Error Codes, but also correct Business Process Layer (BPL) Error Codes (excluding errors from non-executable code) and a list of the differences in processing an Local Service Request (LSR) in IMA-EDI production compared to an LSR processed in the SATE.</p> <p>HP' s recommendation is geared towards Qwest publishing a single document that is maintained throughout the life of SATE as the IMA-EDI production and SATE environments are updated. HP recommends that this single document be inclusive of SATE Legacy and BPL Error Codes and Production vs. SATE differences. This document will provide a CLEC with a single location to review the details regarding all error codes and variances that exist between SATE and Production. This list should be published according to the schedule suggested by Qwest of twice per EDI Release at a minimum.</p> <p>HP has identified that Qwest addresses many of the issues HP intended for Qwest to address. However, HP recommends that there should be a clear commitment by Qwest to maintain a Legacy System Errors List going forward. Rather than delaying and defining the process until the</p>

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		<p>release 9.0, the IMA EDI Errors List will be generated twice per IMA EDI release. The first generation will be coincident with the availability of the new release in SATE, which will occur on January 27, 2002. The second generation will be distributed when the release deploys in production on February 25, 2002. These documents will be published to the CLEC community through the Qwest Release Notification process.</p>	<p>CMP meeting, HP recommends that Qwest define the process for publishing this updated list with each new release of SATE.</p> <p>HP did a preliminary check of the three documents referenced in this recommendation, and has the following opinions:</p> <ul style="list-style-type: none"> • The Legacy System Edit list is a new for SATE Release 9.0. HP is recommending that this document be formally evaluated, and transactions be submitted to ensure the list accurately represents the edits found in SATE. • Qwest has provided a list of the SATE and Production variances within the EDI Data Document for SATE Release 9.0. This list has not been evaluated for accuracy or completeness. HP recommends that this list be formally evaluated and that transactions be submitted to ensure the list accurately represents the variances between SATE and Production. • The BPL List for SATE 9.0 includes system edits for code that has been removed from IMA and SATE and therefore, the list currently does not accurately represent the edits actually found in IMA and SATE. HP recommends that when Qwest updates this list, it is formally evaluated through EDI transactions to ensure the list accurately represent the edits found in IMA and SATE.

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5	<p>HP recommends that Qwest formally incorporate the SATE into the CMP process, and future changes and modifications should be subject to that process and that Qwest develop a permanent, formalized method of obtaining CLEC input and identifying current and future SATE requirements in connection with the CMP process. This process should proactively seek CLEC evaluation of the SATE process, suggestions for improvement, and forecasts for testing requirements. HP also recommends that Qwest obtain input from the CLECS to determine the full suite of products that shall be included in the SATE.</p>	<ol style="list-style-type: none"> 1. SATE is formally incorporated into the CMP process. Qwest began the CLEC SATE Users Group in early November 2001, as part of the CMP process. Its Mission Statement best defines the purpose of the Users Group: Give Qwest the opportunity to communicate current plans for it's testing environments. 2. Give the CLECs the opportunity to communicate their current and future testing needs. 3. Jointly present a list of CRs to CMP to ensure that future enhancements of Qwest environments meet those stated CLECs' needs. <p>This user group has met five times thus far, beginning with the November 6, 2001, kickoff meeting. Meetings for January, February, and March have been scheduled.</p> <p>The SATE Users Group is part of the overall CMP process where inputs and recommendations are taken and incorporated into the CMP processes. To date, Qwest has recorded seven SATE Change Requests (CRs) based on CLEC requirements. These CRs will be taken to the CMP forum for prioritization in the January 17, 2002, CMP meeting. SATE CRs will be managed by CMP just as IMA CRs are managed today.</p> <p>To further incorporate SATE into CMP, Qwest will ensure that the monthly CMP agenda includes a standing entry for SATE discussion. This agenda entry will include discussions on the status of SATE enhancements, SATE CRs, and CLEC feedback. This agenda addition will begin with the January 17, 2002, CMP meeting.</p>	<p>•</p> <p>HP supports Qwest's initial approach to incorporating the SATE into the CMP. HP has not evaluated the SATE Users Group, or its relationship to CMP. HP recommends that the relationship between the SATE and CMP should be more formally documented as a part of the SATE and CMP (as described in Recommendation 1) so that the prioritization, scheduling, and completion of SATE specific CRs are clearly communicated to the community. Qwest should continue to accept feedback on SATE and CMP to ensure the needs of the community are addressed.</p> <p>HP recommends that Qwest develop and publish this process, with input from the CMP/SATE Users Group. HP recommends that when Qwest publishes this process, it is formally evaluated against the criteria defined in Recommendation 1.</p>

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		<p>The proactive incorporation of SATE into the CMP process is consistent with the support of IMA, which will ensure that SATE remains adequate to meet the needs of Arizona CLECs and their future testing requirements.</p>	
6	<p>HP recommends that Qwest develop a formal process by which the SATE will be available for new release testing on an ongoing basis.</p>	<p>Qwest has a formal process by which the SATE will be available for new release testing on an ongoing basis. This process states "Beginning with release 9.0, new releases of IMA are planned for release on the IMA EDI Stand-Alone Test Environment approximately thirty calendar days prior to their release in production unless that release is deemed to be in 'red testing status'. Red Testing Status indicates that the IMA release's system testing effort has discovered significant issues that place the release in jeopardy".</p> <p>Based on the process stated above, IMA EDI Release 9.0 will be implemented in SATE on January 27, 2002, and in production on February 25, 2002. Qwest also notes that on October 22, 2001, IMA EDI Release 8.01 was released in SATE 27 days prior to the associated IMA production release. With the deployment of a new release into SATE approximately 30 days prior to production, Qwest has demonstrated that it has an existing formal process by which SATE is available to CLECs for new release testing on an ongoing basis</p>	<p>HP supports Qwest's proposal for a formal New Release process, if documented appropriately. HP would prefer that Qwest made the SATE available 'at least' 30 days prior to the production release, rather than 'approximately' 30 days prior as suggested by Qwest. Also see HP Recommendation 7.</p> <p>HP recommends that the formal process documented by Qwest for New Release Testing be formally evaluated against the documentation standards as identified in the HP Comments for Recommendation #1.</p>
7	<p>To ensure that the SATE is adequate for full release testing, HP recommends that 9.0 be tested. This release is expected to take place February 2002.</p>	<p>Qwest does not believe that an additional 3rd party evaluation of SATE 9.0 is necessary to determine that SATE is adequate for full release testing. HP has already conducted the full breadth of regression and progression testing for the entire suite of products in SATE 7.0 and 8.0. Furthermore, HP has evaluated a significant point release, 8.01. Therefore, a complete test of 9.0 by HP is not necessary. However, in order to address HP's recommendation, Qwest is willing to file performance information that demonstrates an adequate implementation of 9.0 in the SATE.</p>	<p>HP supports Qwest's proposal for the self-testing of SATE. HP recommends, however, that a third party conduct the same breadth of test against 9.0 to ensure that the community receives a fair representation of the SATE self-testing going forward. This test should also include transactions to validate the correct implementation of new business rules into SATE, validate that the Qwest defined processes are adequate to support a CLEC in executing tests</p>

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		<p>Specifically, in order to calculate the recently developed SATE Accuracy PID each month, Qwest exercises every transaction available in SATE. Accordingly, upon the availability of SATE release 9.0, Qwest will execute all of the SATE transactions, capturing the output to perform the PID calculations. Qwest suggests that it submit the inputs (list of transactions submitted), outputs (results from EDI), results, and conclusions from this exercise to the ACC for review. These results should assure the ACC that the successful regression and progression testing experienced by HP during its evaluation have carried forward to release 9.0 and will continue into the future.</p> <p>Qwest will perform this exercise over a five-day period after the implementation of SATE Release 9.0 on January 27, 2002. Subsequently, Qwest will collate the necessary resulting data and file with the ACC on February 1, 2002.</p>	<p>with a new SATE release, and to validate that the scenarios tested successfully in SATE will also be successful in Qwest's production environment.</p> <p>It is HP's opinion that the results provided by Qwest should be validated against those results found by third-party test as a result of a SATE 9.0 New Release test. The final resulting comparison should provide the community with assurances that Qwest's self-test provides a fair evaluation going forward.</p> <p>It is also HP's opinion that subsequent new releases of SATE should be formally evaluated for quality and accuracy against Qwest's published processes, documentation and performance benchmarks (such as PO-19).</p> <p>Based on HP's interpretation of PO-19, HP recommends, and is currently planning on the following testing activities for New Release Testing on SATE 9.0. Details on HP's approach and association with PO-19 will be included in its New Release Test Approach Document, anticipated to be available by 2/14/02:</p> <ol style="list-style-type: none"> 1. PID Test: This test will execute each scenario listed in the most currently available 9.0 SATE Data Document. The results received by HP will be compared to the expected Result in the SATE 9.0 Data Document. The deliverable will report the overall accuracy of the transactions executed

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			<p>in SATE when compared to the documented expected results. Additionally the test scenario summary worksheets and daily comment/activity logs will be provided. This test is currently under way.</p> <p>2. Business Rules Test: This test will evaluate those business rules that have changed in SATE due to the new IMA-EDI Release 9.0. HP will derive a list of test scenarios based on the Appendix F – Release 9.0 Change Summary and Appendix E updated Additional IMA-EDI edits for 9.0. These scenarios will be executed in SATE to determine if the business rules documented in the most current IMA-EDI Network Disclosure documentation have been implemented successfully into the SATE test bed. The deliverable will report the list of scenarios, the expected outcome, the actual outcome and an overall percentage of accuracy. This test is anticipated to begin on 2/13/02 and conclude on 2/19/02.</p> <p>3. Re-Test of PID for determination of SATE Environment Stability: This test will be a re-test of all scenarios executed in Phase I. The deliverable will report the overall accuracy of the transactions executed in SATE when compared to the documented expected results in the most current 9.0 Data Document. Additionally the test scenario summary worksheets and daily comment/activity logs will be provided. This test is anticipated to begin on 2/20/02 and</p>

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			<p>conclude on 2/25/02.</p> <p>4. Production Mirror Testing: This will be a test of a selected sample of SATE test bed scenarios. This test will execute scenarios in IMA-EDI production that resemble the SATE test bed scenarios. This test will require production test bed be established by Qwest for the scenarios to be executed successfully in production. The expected result of the production transaction is the expected result of the same scenario in the SATE data document. This test is anticipated to begin no earlier than 2/26/02 pending the creation of Qwest Production test bed and HP Pseudo-CLEC certification of appropriate products.</p>
8	<p>HP recommends that a SATE performance standard be developed for Arizona that addresses the need for Qwest to demonstrate that the SATE remains an adequate mirror image of production as OSS systems evolve. In reviewing this standard, the ACC may wish to consider the nature and volume of transactions that are executed in production.</p>	<p>Qwest has already proposed a measurement that is being discussed by the Arizona TAG. The agreement of the parties, once reached, should be used to satisfy this recommendation.</p> <p>Qwest has developed a SATE performance measure, PO-19 – Stand-Alone Test Environment (SATE) Accuracy. The language of this measure has been agreed and its purpose is to “evaluate Qwest’s ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the SATE environment”.</p> <p>The AZ SATE PID was developed through consensus with the CLEC’s. However, the standard for this measure has not yet been agreed. Discussions are ongoing with the Arizona TAG. Regardless, Qwest will begin reporting on this measure with November 2001 results in the December 2001 reports.</p>	<p>PO-19 is currently under discussion by the parties. HP will provide further input if requested by the ACC.</p>
9	<p>HP recommends that Qwest file</p>	<p>Qwest respectfully submits this document as the response to this</p>	<p>Qwest filed the Implementation Plan with the</p>

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	with the ACC an implementation plan for the above recommendations, which includes specific deliverables, milestones, and dates, no later than December 31, 2001.	recommendation for filing an implementation plan as presented by HP. As the above responses to the recommendations indicate, Qwest has addressed many of the recommendations already and is committed to ensuring that the remaining recommendations are fully implemented by the end of February 2002.	ACC on December 28,2001. This document reflects HP's evaluation of that implementation plan.