

**TI 818**  
**EXCEPTION 3109 – DISPOSITION REPORT**  
Qwest OSS Evaluation

---

Initial Release Date: January 22, 2002  
First Response Date: February 21, 2002  
Disposition Report Date: March 19, 2002

**EXCEPTION DISPOSITION REPORT**

**Exception:**

**Qwest's Mediated Access Electronic Bonding and Trouble Administration (MEDIACC-EBTA) End-to-End testing lacks a complete testing environment.**

**Summary of Exception:**

Qwest provides CLECs with the opportunity to implement a trouble reporting system called Mediated Access Electronic Bonding Trouble Administration (MEDIACC-EBTA). A detailed System Test plan, provided by Qwest, outlines the following framework for a CLEC to test its EBTA interface:

1. Gateway-to-Gateway testing
2. Stack-to-Stack testing
3. End-to-End testing (System Testing)
4. Operational Readiness Test (Production Environment)

During the End-to-End testing phase, as described in the System Test Plan, test scenarios for non-designed services, such as Plain Old Telephone Service (POTS) circuits, are processed by the LMOS production mainframe. Limitations in testing non-designed services during End-to-End testing include:

1. Qwest utilizes the LMOS production mainframe for End-to-End testing of any non-designed services. By using the LMOS production mainframe for CLEC testing purposes, Qwest does not provide CLECs with a test environment that is completely separate from the production environment.
2. The dependency to use Qwest's LMOS production mainframe for testing limits certain test scenarios, as there are particular circumstances in which Qwest is not be able to prevent services from being dispatched. As a result, if erroneous test scenarios are submitted during End-to-End testing, and are processed by LMOS, live production accounts will be affected in a negative way. These limitations for testing the full range of non-designed services, without impacting live accounts, are neither documented nor made publicly known to CLECs.

Based on the identified limitations, the Qwest EBTA testing environment does not provide CLECs with a true representation of how transactions will function and respond in Qwest's EBTA production environment.

**TI 818**  
**EXCEPTION 3109 – DISPOSITION REPORT**  
Qwest OSS Evaluation

---

**Summary of Qwest’s Initial and Supplementary Responses:**

Qwest initially responded on February 4, 2002. Qwest acknowledged that for non-Designed ETE (End-to-End) testing, trouble reports and MLT tests are processed using the LMOS production applications. However, Qwest stated that it does not believe the use of the production environment limits the interface testing capabilities of CLECs. Qwest described the specific process steps that CLECs follow to conduct end-to-end testing for EBTA. The steps include developing a Joint Implementation Agreement (JIA), creating a System Test Plan, formulating a Project Plan, negotiating test scenarios, and submitting transactions. Qwest also described the manual and automatic safeguards employed to facilitate testing while preventing negative impacts to the production environment.

Qwest reiterated its position in its March 13, 2002 response. Qwest stated that it has successfully demonstrated its ability to mitigate any risk associated with using the LMOS production system within its EBTA test environment. Furthermore, Qwest believes that the structure and processes used for EBTA testing are more than sufficient to allow a CLEC to perform interoperability testing without negatively impacting production accounts or systems. Qwest also maintained that the EBTA testing environment provides CLECs with a true representation of how transactions will function and respond in Qwest’s EBTA production environment, regardless of the manual interventions.

Additionally, Qwest referenced a regulatory position that the *“FCC has in the past held that the provision of an integrated, computer-to-computer maintenance and repair interface is not required to satisfy the “substantial same time and manner” test, provided that the BOC otherwise demonstrates that it provides equivalent access to its maintenance and repair functions.”* Qwest believes that the EBTA interface and its test environment more than satisfy the requirements set forth by the FCC.

Based on the facts set forth in its response, Qwest respectfully requested that KPMG Consulting close this exception and categorize it as “closed/unresolved”.

**Summary of KPMG Consulting’s Initial and Supplementary Responses:**

In KPMG Consulting’s February 21, 2002 response, it maintained that that segregation of testing environments from production environments is an important aspect of interface development for a variety of reasons, and that it is inherently risky to test transactions within a production environment.

KPMG Consulting further investigated the commercial experience of CLECs to assess the impact of the production component on their testing efforts. KPMG Consulting

**TI 818**  
**EXCEPTION 3109 – DISPOSITION REPORT**  
Qwest OSS Evaluation

---

discovered that, although CLECs were able to test all of the agreed upon scenarios, they found the process of testing non-designed services cumbersome, due to the necessary manual intervention of the Qwest Tester. KPMG also cited commercial activity where a CLEC had two of its non-designed services test trouble reports pass by the Qwest Tester through to the Qwest Production Screeners. The Screeners proceeded to call the CLEC's production operation center to obtain additional information and/or dispatch permission. Although the production environment was not ultimately impacted, KPMG Consulting maintained that this example proves the potential pitfalls of not completely separating test environments from production systems.

Additionally, KPMG Consulting stated that Qwest has not adequately documented the architecture of the EBTA test environment. Based on the documentation provided, KPMG Consulting determined that Qwest has not sufficiently described how the LMOS production system is used during end-to-end testing or what the known limitations are of using a test environment with a production component.

**KPMG Consulting's Disposition Report (03/19/02):**

KPMG Consulting reviewed Qwest's March 13, 2002 supplemental response, and acknowledges the request to close this Exception as unresolved.

**Attachments:** *None*