TI 499
EXCEPTION 3029—DISPOSITION REPORT
Qwest OSS Evaluation

Initial Release Date: August 31, 2001
First Response Date: September 28, 2001
Second Response Date: November 2, 2001
Third Response Date: January 8, 2002
Fourth Response Date: February 4, 2002
Disposition Report Date: March 14, 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) Interoperability Testing Environment does not offer Co-Providers with sufficient testing capabilities.

Summary of Exception:
In the course of interviews and documentation reviews, KPMG Consulting noted that the IMA EDI Interoperability test environment does not provide the testing capabilities for a CLEC to sufficiently test the IMA EDI interface prior to connecting to Qwest's production systems. The following limitations were specifically identified:

- The Interoperability testing environment, does not offer true end-to-end testing capabilities through to Qwest's provisioning and billing systems.

- Flow-through orders are not supported in the Interoperability testing environment, even though these types of orders will be processed in the production environment. A CLEC is unable to predict the performance of flow-through orders in production. This limits the ability of a CLEC and Qwest to test completion of orders in a timely manner.

- In order to test transactions in the IMA/EDI Interoperability Testing Environment, CLECs must use valid production data, because the customer information is validated against data that resides in the production databases. The use of valid customer data could adversely impact CLEC customers.

KPMG Consulting stated that these limitations could hinder a CLEC's ability to effectively test its EDI interface capabilities. The inability to conduct effective testing could increase a CLEC's operating expenses as a result of additional time required to ensure the functionality of the systems, and could also decrease revenues if delays prevent a CLEC from servicing clients. KPMG Consulting issued Exception 3029 on August 31, 2001 based on these identified issues.

Summary of Qwest's Initial and Supplementary Responses:

Qwest initially responded on September 13, 2001, stating that the EDI Certification process involves a multi-step testing process that was agreed to by CLECs in workshops, and is described in Section 12.2.9.3 of the SGAT. Qwest further stated that the multi-step testing process has resulted in over 25 successful CLEC implementation and migrations (Release 4.0, 5.0, 6.0, 7.0 and 8.0) over the last 2 years.

In Qwest's response dated October 19, 2001, Qwest attempted to address the concerns that KPMG Consulting had outlined in its previous response. The concerns were outlined as follows:

1. Interop does not generate post-order responses in the same manner they are created in production,
2. Interop does not provide flow through,
3. Production data must be used in Interop.

In addressing the concerns of the Interoperability environment, Qwest specifically stated the following:

"Although these findings are focused on the Interop test environment, Qwest has no plans to continue to enhance the Interop environment; Qwest will continue to enhance SATE."

Within the context that Qwest would only devote resources to further developing the Stand Alone Test Environment (SATE), Qwest responded to each concern. For the first two items, Qwest stated that it would develop mechanisms to automate certain post order responses and to support flow through testing in future versions of SATE. The post order responses that would not be automated would continue to be manually generated by System Test Engineers. For the third point, Qwest stated that SATE provides the ability to use test accounts and scenarios, which can be readily reused, and that the CLECs can request new test scenarios as needed.

In Qwest's supplemental response dated December 21, 2001, Qwest provided further clarification regarding the implementation timeframes for the proposed SATE functionality enhancements (automated post order responses and flow through capabilities). Qwest also outlined proposed updates to the EDI Implementation Guide, including procedures for a CLEC to use both SATE and the Interoperability environment for a single implementation of EDI.

Qwest updated the EDI Implementation Guide on January 22, 2002, to include language that described how a CLEC could utilize both the SATE and Interoperability environment for a single EDI implementation. Qwest also issued a notification to make the CLEC community aware of the new EDI documentation. Subsequently, Qwest updated the EDI Implementation Guide and released another version of the documentation on February 18, 2002. The revisions included further clarification regarding the dual use of SATE and Interop for an EDI implementation. In

Qwest's February 19, 2002 response, Qwest detailed the enhancements that it had made to the EDI Implementation Guide to adequately describe the process for using both SATE and Interop for testing and implementing EDI. The enhancements specifically addressed documentation concerns that KPMG Consulting had outlined in its February 4, 2002 response.

KPMG Consulting's Disposition Report (03/14/02)

Summary of KPMG Consulting's Retest Activities:

Qwest indicated in its December 21, 2001 response that it would begin allowing CLECs to use a combination of Interop and SATE to test EDI transactions during an implementation of IMA. By asserting that CLECs may use a combination of the environments for EDI implementation, KPMG Consulting believes that each of the issues raised in this Exception is addressed by SATE functionality and its proposed enhancements. The issues of manual handling of post order responses and lack of flow through capabilities in SATE are further documented and addressed in Exception 3077.

Since the process of utilizing both testing environments for an implementation is a new process, Qwest modified the EDI Implementation Guide to describe the process and its ramifications. The EDI Implementation Guide was initially updated and released to CLECs on January 22, 2002. KPMG Consulting reviewed that version of the documentation and determined that it did not adequately and thoroughly describe the combined test environment process. In its February 4, 2002 response, KPMG Consulting specifically outlined the minimum documentation expected to support the combined test environment process. KPMG Consulting stated that such documentation should include, at a minimum, the following subjects:

- Full description of all steps in the new process, highlighting deviations from the normal progression testing process;
- Detailed description of how a CLEC can seamlessly transition between the two environments during testing;
- Requirements for using both environments;
- Limitations when using both environments;
- Pros and cons for choosing each of the testing options.

Qwest updated the EDI Implementation Guide as of February 18, 2002 and made it publicly available on the Qwest Wholesale website. KPMG Consulting reviewed the documentation, as well as Qwest's February 19, 2002 response, to determine if Qwest had adequately enhanced the EDI Implementation Guide per the minimum guidelines set forth by KPMG Consulting.

Summary of KPMG Consulting's Retest Results:

Based upon its review of the updated *EDI Implementation Guide* released on February 18, 2002, as well as Qwest's February 19, 2002 response, KPMG Consulting believes that Qwest has satisfactorily addressed the minimum documentation requirements to help CLECs understand the process for utilizing the combined test environment option. Therefore, KPMG Consulting is satisfied that the issues raised in this Exception are resolved.

KPMG Consulting recommends that Exception 3029 be closed.