

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

In the Matter of the Investigation into  
U S WEST Communications, Inc.'s  
Compliance with § 271 of the  
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST Communications,  
Inc.'s Statement of Generally Available Terms  
Pursuant to Section 252(f) of the  
Telecommunications Act of 1996

Docket No. UT-003040

**QWEST CORPORATION'S REPORT  
ON THE STATUS OF CHANGE  
MANAGEMENT PROCESS REDESIGN**

Qwest Corporation provides this status report regarding the meetings it has held with CLEC representatives regarding the redesign of Qwest's Change Management Process ("CMP"). As in the past, Qwest proposes that CLECs and other parties to this proceeding be given a reasonable amount of time to file comments on this report.

**I. BACKGROUND**

CLEC and Qwest representatives have met for more than 40 days over the past ten months to discuss every aspect of Qwest's CMP. As a result of this extensive collaboration, Qwest and the CLEC community have reached agreement on all substantive aspects of Qwest's CMP.<sup>1</sup> Qwest has implemented that process and posted the current version of the Qwest Wholesale Change Management Process document ("Wholesale CMP") describing it on the "What is CMP?" page of Qwest's wholesale web site.<sup>2</sup>

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<sup>1</sup> Qwest has established a web site where it has posted the redesign meeting minutes and other materials. The web site address is [www.qwest.com/wholesale/cmp/redesign.html](http://www.qwest.com/wholesale/cmp/redesign.html).

<sup>2</sup> Qwest's Wholesale Change Management Process Document, which is attached as Exhibit A, can also be found at the following URL:

In prior status reports, Qwest reported that the redesign team has reached agreement regarding the following:

- scope of CMP;
- escalation and dispute resolution processes for the CMP;
- processes for systems change requests ("CRs") submitted by CLECs;
- processes for product and process CRs submitted by CLECs;
- interim exception processing for OSS interfaces, product, and process changes;
- process for introduction of a new OSS interface;
- process for changes to existing OSS interfaces;
- process for retirement of an OSS interface;
- process for interface testing;
- process for CMP meetings;
- production support processes, including a technical escalation process;
- prioritization of systems CRs;
- special change request process (agreement in principle);
- interim Qwest-initiated product/process change process;
- process for changing the CMP;
- language to address conflicts between CMP changes and interconnection agreements;
- OSS interface release calendar;
- process for ranking late added CRs;
- list of defined terms; and
- exception process (agreement in principle).

## **II. THE REDESIGN TEAM HAS MADE SIGNIFICANT PROGRESS SINCE THE LAST STATUS REPORT.**

The redesign team has continued working on language to memorialize the agreements in principle reached regarding the Category 1 and 0 issues.<sup>3</sup> The parties have reached agreement regarding detailed provisions memorializing six of the twelve Category 1 issues. The team has

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<http://www.qwest.com/wholesale/cmp/whatiscmp.html> The agreements reached are interim draft agreements, subject to the CMP participants reviewing the agreements in the context of the entire final document.

<sup>3</sup> The current list of Category 1 and 0 issues is attached as Exhibit B.

made substantial progress in crafting detailed provisions for four of the remaining six issues. The team agreed that it may not be necessary to address rate changes and rate validation (Issue V.d.) by inserting language into the Wholesale CMP and that language is definitely not necessary to address the process for non-coding changes (Issue I.A.3). The team has also agreed to specific agreements addressing four of the ten Category 0 issues, and made substantial progress toward agreeing on language to address three additional issues. The team agreed that no language is required to address the remaining three issues, which refer to the process when a CLEC-impacting change occurs, but was not expected (Covad Issue #1), retail changes that may be CLEC-impacting (Covad Issue #3), and how Qwest will prove that it has implemented changes (WorldCom).

The agreements reached since the last status report are summarized below.<sup>4</sup>

**Qwest-Initiated Product/Process Change Process.** The parties have now reached agreement regarding a detailed Qwest-Initiated Product/Process Change Process, which has been incorporated in section 5.4 of Qwest's Wholesale CMP.<sup>5</sup> Section 5.4 contains five tiers of processes, called "levels," differentiated by the expected impact of changes on CLECs. Each level includes an exclusive list of the categories of changes to which the processes for that level apply. On April 16, 2002, the CMP redesign team agreed to refinements to the categories of

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<sup>4</sup> The minutes for the redesign meeting held on April 16, 2002, which are attached as Exhibit C, are currently in draft form and are posted on Qwest's redesign web site at the following URL: <http://www.qwest.com/wholesale/cmp/redesign/html> The minutes for the redesign meeting held on April 2-4, 2002, will be posted to Qwest's web site in draft form shortly.

<sup>5</sup> Qwest's Wholesale Change Management Process Document is attached as Exhibit A and can also be found on the "What is CMP?" page on Qwest's wholesale web site at the following URL: <http://www.qwest.com/wholesale/cmp/whatiscmp.html>

changes to which each process level applies. The language was baselined and inserted in the Wholesale CMP.

**Withdrawal of Prioritized CRs.** The team reached agreement regarding the process for a CLEC or Qwest to withdraw a CR that has been prioritized for inclusion in an OSS release. This process is set forth in Section 10.2.5 and may be invoked at any time between the prioritization process and the commitment for the release. Qwest will determine its ability to work additional candidates for the release based upon the timing of the withdrawal request. After commitment, a CLEC or Qwest could request the CR be withdrawn, however, the withdrawal of the candidate may not be feasible based upon the development status at the time of the withdrawal request. The originating CLEC or Qwest will submit a written request to the Qwest Systems CMP Manager indicating its desire to withdraw the CR. This notification must be sent no later than 21 calendar days prior to the monthly Systems CMP meeting at which the request will be discussed and must contain specified information.

If a CLEC or Qwest disagrees with the withdrawal of the CR from the release, it can assume sponsorship of that CR by notifying the Systems CMP Manager in writing of their intent to assume sponsorship of the CR within 5 business days after the Systems CMP Manager has sent the intent to withdraw e-mail. If the Systems CMP Manager receives no response within 5 business days, then the CR will be withdrawn. The new status will be reviewed in the next monthly Systems CMP meeting.

**Reasons for Qwest Denial of CRs.** If Qwest denies a CR, it must include in its response the basis for the denial, including reference to substantiating material. The team

reached agreement on the reasons for which Qwest may deny a CLEC-initiated OSS Interfaces change, which are set forth in Section 5.1.3 of the Wholesale CMP. The reasons for denial are:

- Technologically not feasible—a technical solution is not available
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- Regulatory ruling/Legal implications—regulatory or legal reasons prohibit the change as requested, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions)
- Outside the Scope of the Change Management Process—the request is not within the scope of the Change Management Process (as defined in this CMP), seeks adherence to existing procedures, or requests for information
- Economically not feasible—low demand, cost prohibitive to implement the request, or both.
- The requested change does not result in a reasonably demonstrable business benefit (to Qwest or the requesting CLEC) or customer service improvement .

Qwest will not deny a CR solely on the basis that the CR involves a change to back-end systems. Qwest will apply these same concepts to CRs that Qwest initiates. The SCRCP may be invoked if a CR was denied due to economically not feasible—refer to Section 10.3 SCRCP.

**Special Change Request Process.** The team agreed on language describing the Special Change Request Process ("SCRCP"), which allows a CLEC or Qwest to fund the cost to develop and implement a systems CR that would not otherwise be included in a release because it was ranked low during prioritization or was denied because it was not economically feasible. The process sets forth the method for invoking the process, provides for preliminary and firm quotes regarding the work to be accomplished, as well as payment provisions, and specifies how the SCRCP can be changed or canceled at various points in the process. The SCRCP is set forth in Section 10.3 of the Wholesale CMP.

**Crossover CRs.** The team reached agreement regarding the process for handling systems CRs that require for product/process discussion or solutions, and product/process CRs

that require systems solutions. The process is set forth in Section 5.5 of the Wholesale CMP and applies in three basic situations. First, if a product/process CR is discovered to require a mechanized solution, a new systems CR will be opened with a reference to the product/process CR, and the product/process CR will be closed with reference to the new systems CR. Second, if a systems CR is discovered to require a manual solution, Qwest will open a product/process CR with a reference to the systems CR, and close the systems CR with a reference to the new product/process CR. Third, if a systems CR requires an interim manual solution, the CR will be tracked as a systems CR for the length of the CR lifecycle including the development and implementation of both the interim manual and final mechanized solutions.

If a CR becomes a crossover CR, Qwest may request an ad hoc clarification meeting with the CR submitter or request that a portion of the appropriate CMP monthly meeting be devoted to discussing the CR. If a CR is closed in one CMP arena and opened in the other, the new CR will retain the status, where feasible, and the date submitted of the old, “closed” CR. Under no circumstances will the CR be restarted.

All Regulatory and Industry Guideline CRs will be submitted as systems CRs and maintained in the systems database until closure, or until they are deemed to require a manual process solution, at which point they will become product/process CRs.

**Training.** The team agreed to add a new Section 13 to the Wholesale CMP to address training. The new section reads as follows:

Qwest will incorporate all substantive changes to existing Graphical User Interfaces (GUI), including the introduction of new GUI, into CLEC training programs. Qwest will execute CLEC training for pre-order, ordering, billing, and maintenance and repair GUI.

**13.1 Introduction of a New GUI**

Qwest will include a CLEC training schedule with the Introduction of a New GUI Release Notification issued no less than forty-five (45) calendar days prior to the Release Production date. Qwest will make available CLEC training beginning no less than twenty-one (21) calendar days prior to the Release Production Date. Web based training will remain available for the life of the release.

**13.2 Changes to an Existing GUI**

Qwest will include a CLEC training schedule with the Draft Release Notes issued no less than twenty-eight (28) calendar days prior to the Release Production date. Qwest will make available CLEC training beginning no less than twenty-one (21) calendar days prior to the Release Production date. Web based training will remain available for the life of the release. CEMR training will not be available before the release but will be conducted for 90 days in the live environment after the Release Production date.

13.3

Product and Process Introductions and Changes Qwest may offer CLEC training for product and process introductions and changes based on the complexity of the introduction or change. This training is offered in many forms, but is most commonly offered in the following delivery methods: web-based, instructor-led, job aids, or conference calls.

**Implementation of Regulatory CRs.** The team reached agreement regarding the process by which Regulatory CRs are implemented. The process is set forth in Section 5.1.2 of the Wholesale CMP. All Regulatory CRs must initially be submitted as systems CRs. For each Regulatory CR, Qwest will provide a cost analysis for both a manual and a mechanized solution. The CR originator may request that the CR be treated as a Regulatory CR. If Qwest or any CLEC does not agree to treat the CR as a Regulatory Change, it will be treated as a Qwest or CLEC initiated change.

As a general rule, a Regulatory Change will be implemented by mechanization unless all parties agree otherwise or one of the following exceptions to the general rule is established: (1) the mechanized solution is not technically feasible, or (2) there is a significant difference in the costs for the manual and mechanized solutions. The decision regarding whether an exception is

established is determined by a majority vote of the parties present at the monthly CMP meeting when the CR is discussed.

The vote regarding an exception or variance can be postponed until the next monthly CMP meeting upon a majority vote of the parties present at the monthly meeting when the CR was discussed. Once the parties agree to implement a Regulatory CR by a manual solution, the CR will be, from that point forward, tracked as a Product/Process CR through the monthly CMP Product/Process meetings.

If Qwest is unable to fully implement a mechanized solution in the first release that occurs after the CMP participants agree that a change has been mandated, Qwest's implementation plan for the mechanized solution may include the short-term implementation of a manual work-around until the mechanized solution can be implemented. In that situation, a single systems Regulatory CR will be used for the implementation of both the manual and mechanized changes. Qwest will continue to work that Regulatory CR until the mechanized solution is implemented.

If a regulatory CR is implemented by a manual process and later it is determined that a change in circumstance warrants a mechanized solution, Qwest or any CLEC may submit a new systems CR which must include evidence of the change in circumstance, such as an estimated volume increase or changes in technical feasibility, and the number of the CR that was implemented using a manual process.

**Other Progress.** In addition to the agreements summarized above, the parties made substantial progress in developing detailed provisions for the exception process, the process for postponing the implementation of a product/process change, and SGAT section 12.2.6.

Qwest will continue holding the redesign sessions until the parties have finalized the detailed provisions to describe their agreements and include them in the Wholesale CMP Agreement, and to address any other unresolved issues. The schedule of redesign meetings is attached as Exhibit D.

**III. CONCLUSION**

Qwest appreciates the time and effort the CLECs have devoted to participating in the redesign of Qwest's CMP. Qwest is confident that the collaborative redesign process has produced an effective CMP that meets CLEC needs and exceeds industry standards.

Dated this 16<sup>th</sup> day of May, 2002.

Qwest Corporation

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