

Performance Measure Audit Report

I. PO-16 – Timely Release Notifications

A. Introduction and Background

Performance measure PO-16 reports the percentage of release notifications for changes to specified OSS interfaces sent by Qwest to CLECs within specified intervals. Qwest developed this measure after Liberty had completed its audit of performance measures, and the ROC TAG requested that Liberty audit PO-16. The latest PID for PO-16 is labeled “16 Apr 02 Proposed Revision.” The first month for which Qwest reported PO-16 results was October 2001. [AT&T Question: What version of the PO-16 PID did Liberty Consulting use to perform its audit?]

PO-16 reports the number of specific types of release notifications sent within intervals provided in Qwest’s Change Management Process (CMP) divided by the total number of release notifications that were or should have been sent during the month. The PID describes what constitutes release notifications, which, in summary, are initial and final requirements and release notes for several, specific OSS interfaces that are listed in the PID. Qwest reports the measure monthly on a region-wide basis. The notifications that are excluded from the measure but which would otherwise qualify are those for which Qwest and the CLECs agree that timely notification is not necessary, such as changes implemented on an expedited basis.

B. Overall Summary

Qwest has satisfactorily developed and reported PO-16. It is a new measure that Qwest initially reported inaccurately. However, the number of items qualifying for the measure each month is small, and Qwest has improved its process and clarified the PID.

C. Analysis

Qwest responded to Liberty’s initial data request and participated in an interview regarding PO-16. As a result of these discussions, Qwest indicated that it needed to perform some additional work related to this performance measure and revise its response to Liberty’s data request.

On April 19, 2002, Qwest provided a revised response to Liberty’s request, and on April 24, 2002, Liberty and Qwest discussed that response and other matters associated with the performance measure. Qwest indicated that it had performed its own review of the results reporting and found that there were errors in determining whether notifications had been timely and in judging whether a particular document should have been included in the measurement. The table below provides the initial and revised performance results.

Month	Initial Reporting		Revised Reporting	
	Numerator	Denominator	Numerator	Denominator
Nov	0	1	1	1
Dec	3	3	0	0
Jan	1	1	1	3
Feb	1	1	0	1

Some of the errors were caused by a misinterpretation of the PID language as to exactly what type of notifications qualified for reporting [AT&T Questions and Comment: What was the original interpretation that Liberty had? What means did Liberty employ to raise the question of interpretation? What is the current interpretation? Given that the PO-16 PID is currently being refined, it would be quite helpful to understand some of the specific misinterpretation(s) of PID language. Please identify the PID misinterpretations that Liberty discovered.]. Liberty agrees that the PID language was not precise and was the very reason that prompted many of Liberty's initial questions. [AT&T Comment: The PO-16 PID revision discussions would greatly benefit if Liberty were to identify what it believes are imprecision in the PID language.] Qwest has taken two steps to prevent this type of error: revised the PID [AT&T Questions: What are the revisions? When were they proposed to the TAG? When were they authorized by the TAG?] and embedded a designator ("RN") in the identity of notices that are to be included in PO-16 [AT&T Questions: What does the embedded ("RN") designator mean? How did Liberty use it in its audit?].

In another case, Qwest's Release Calendar on its web site did not include a particular scheduled system release, and although a notice had been sent to CLECs, it did not get picked up in the measure. [AT&T Questions and Comment: Which "miss" is this in the above chart? A failure to identify the complete scope of releases that are subject to PO-16 should have resulted in the generation of an Exception. Why was no Exception created?] Qwest has taken several steps to give better responsibility for and visibility to its Release Calendar. [AT&T Questions and Comment: Given that there is no Observation or Exception documentation trail that can be followed, please identify the steps that Qwest took to give better responsibility for and visibility to its release Calendar and how Liberty Consulting determined that those steps were effective in ensuring that Qwest has all of the release notifications captured in the PO-16 measure.]

Liberty reviewed all of the notices reported under PO-16 regardless of whether they were reported accurately or inaccurately [AT&T Question: Please identify the notices that Qwest inaccurately reported.], copies of the e-mails that time-stamped the notifications, and the CMP document ("Master Redlined CLEC-Qwest CMP Redesign Framework") that specifies the required notification interval and verified that Qwest's revised performance reporting was correct. [AT&T Questions: Over what period of time were the Release Notifications dated, with which Liberty performed its audit? How many Release Notifications were reviewed? Please provide a list of the Release Notifications Liberty reviewed including the Release Notification Number, the Release Notification Date, and the Release Notification Subject Line. Please explain how Liberty was able to conclude that Qwest's revised performance reporting was correct in the face of admittedly inaccurate reporting.]

The ROC-TAG considered the revised PO-16 definition on May 2, 2002. However, it was not approved because of discussions between CLECs and Qwest concerning additional changes. [AT&T Question: It appears that Liberty conducted its audit of PO-16 to an unapproved PID

definition. Please indicate if Liberty used an unapproved PID to conduct its audit.] It is Liberty's understanding that such changes involve clarification of the use of the "RN" designator mentioned above, and the addition of notices involving new and retired interfaces, not just the changes to existing interfaces currently mentioned in the PID. These changes would not affect the results of this audit, but could be items for future monitoring or auditing.

D. Findings and Conclusions

1. Performance Measure Release Date

PO-16 satisfactorily completed the audit on May 2, 2002.

2. Exceptions

There were no exceptions regarding this measure.

3. Observations

There were no observations regarding this measure.

4. Conclusions

PO-16 provides visibility to Qwest's timely notification of important interface release documents. Qwest's current reporting of PO-16 is accurate on the basis of the April 16, 2002, proposed revision to the PID. [AT&T Comment: Given that Liberty acknowledged that the April 16, 2002 proposed revision of the PID had not been approved, AT&T finds it quite surprising and premature that Liberty found compliance with a proposed, unapproved PID. Because Liberty apparently performed its audit against a proposed, unapproved version of PO-16, AT&T believes it premature and inappropriate for Liberty to have reached any conclusions on PO-16. At best, Liberty could have reached conclusions based upon version 4.0 (October 22, 2001) of the PIDs.]

E. Recommendations

There apparently will be changes to the PID for PO-16 that will require additional types of notices to be reported in the future. Moreover, and depending on the significance and use of this performance measure, as well as any feedback received from CLECs, PO-16 should be a candidate for future monitoring efforts because there is not a history of accurate reporting for the measure.