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ROC OSS 271 VENDOR TECHNICAL CONFERENCE #3

Hotel Teatro

1100 Fourteenth Street

Denver Colorado

Tuesday, May 14, 2002

1 APPEARANCES :

2 AT&T

3 JOHN FINNEGAN
4 MARY TRIBBY
5 TIM CONNOLLY

6 HPC

7 CHERIE MONTEFERRANTE
8 DON PETRY
9 ERIC BIGGERSTAFF
10 FRANKIE BUENO
11 GEOFF MAY
12 JEANMARIE STURM
13 JEFF CROCKETT
14 KYLE KIRVES
15 LEE TRUDEAU
16 LIZ GRAGERT
17 MARY CEGELSKI
18 TERRI JOHNSON
19 TRICIA PARKER

20 KPMG

21 MIKE WEEKS
22 JOE DELLA TORRE
23 BEN HEMPHILL
24 CARRIE THIELEMANN
25 JOE GORALSKI
JOHN DEAHL
LIZ FUCCILLO
NOLAN DINSMORE
RUSS GUZDAR
ALAN SALZBERG
YLONDA CHESTNEY
TERRY TRUDGIAN
ANN LAWRENCE
BOB FALCONE
BRIAN RUTTER
CHRIS BLACK
FELICIA KENDRICK
FRED ARMSTRONG
GEORGE CORYELL
JASON CUMBERLAND
JULIANA BARTRA
MARCOS DaCRUZ
MICHAEL BUJAN
MICHELLE TULIEN
RICH WOODHOUSE
RYAN SHURTER
SAM YEUNG

1 APPEARANCES (CONTINUED):

2 KPMG cont'd
3 STEVE CORECO
4 TOBY SCHWARTZ
5 VAN HOWARD

6 MTG
7 DENISE ANDERSON
8 BOB CENTER
9 MARIE BAKUNAS

10 QWEST
11 ANDY CRAIN
12 BARB BROHL
13 BARRY ORREL
14 BRAD HOFFNER
15 CECELIA ORTEGA
16 CHARLIS MILLER
17 CHRIS VIVEROS
18 DAN POOLE
19 DEBBIE PATTERSON
20 FRED AESQUIVEL
21 GARY WOODSIDE
22 JACKIE DONALDSON
23 JENNIFER CALDWELL
24 KRISTIN PROVOST
25 LUCY HIGLEY
26 LYNN NOTARIANNI
27 MIKE WILLIAMS
28 NANCY LUBAMERSKY
29 NITA TAYLOR
30 PAT HALBACH
31 RON TRULLINGER
32 SCOTT SIMANSON

33 WORLDCOM
34 BECKY OLIVER
35 TOM DIXON

36 NEW MEXICO
37 MIKE RIPPENGER

38 OREGON
39 IRV EMMONS

40 WASHINGTON
41 DAVE GRIFFITH
42 TOM SPINKS

1 APPEARANCES (CONTINUED):

2 NEBRASKA

BUSTER GRIFFING

3 DICK PALAZZOLO

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1 P R O C E E D I N G S

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3 MS. ANDERSON: Welcome to VTC
4 Number 3, hopefully the last vendor technical
5 conference of the ROC OSS Test.

6 We are going to start right in this
7 morning. We have the facilities, the restrooms
8 are out that door and to the left. You also,
9 because we have kind of tight quarters here,
10 you can go out this way and come around through
11 the hallway to get over there.

12 We have coffee and continental
13 breakfast out that door, and we will be taking
14 a break later this morning. Folks are on their
15 own for lunch. And a break in the afternoon.

16 And I was just informed by Joe that
17 if any day is a day we might break a little
18 early, it will be today. So we will maybe be
19 moving, of course, John Finnegan of AT&T is
20 laughing heartily about that, folks on the
21 bridge. If that happens, we will take the
22 opportunity to move the follow-up questions
23 from VTC 1 and 2 up to fill any gaps.

24 Any questions before we get started?
25 We are going to do, go around the room and do

1 introductions and then go also around the
2 bridge and then dive in.

3 Any questions before we get started?

4 Okay. Let's go to the bridge, first.

5 (INTRODUCTIONS OF PERSONS IN
6 THE ROOM AND ON THE BRIDGE)

7 MS. ANDERSON: Okay, folks. One
8 cautionary statement before we get going. As
9 you all recall, the purpose of these sessions
10 is to elaborate on the facts, the testing
11 results and the process, not to take advocacy
12 positions.

13 And we have been pretty good at
14 doing that except for the occasional whine from
15 a CLEC and the occasional whine from a Qwest
16 person. But, for the most part we have
17 succeeded -- so, and I am very confident that
18 we will succeed again this time.

19 With that I would like to turn it
20 over to Joe and Mike. Take it away.

21 MR. DELLA TORRE: Good morning,
22 all. I think we will just jump straight into
23 it today.

24 We will start with the Montana
25 questions for Test 19. And there are two.

1 The first asked for clarification of
2 long distance telephone call versus toll call.
3 And the toll calls are -- represent intraLATA,
4 I-N-T-R-A, calls, whereas long distance calls
5 represent interLATA, I-N-T-E-R.

6 The second question is, does the use
7 of the term "automatically" mean that there is
8 an automated system in place to send
9 appropriate personnel pages?

10 The answer to that is yes.

11 We will jump right into the AT&T
12 questions. I will try to summarize, where
13 appropriate, but give at least the spirit of
14 the question.

15 MS. ANDERSON: Joe, I will just jump
16 in here. I should have said this. Excuse me
17 for interrupting. Please remember that we are
18 being transcribed and we need to have folks
19 when they speak mention their name and company
20 and we will go from there.

21 You will stop us I know if you can't
22 hear. So please feel free to do that or if you
23 need any clarification. Thanks. He's getting
24 used to us now.

25 Sorry, Joe, go ahead.

1 MR. DELLA TORRE: Okay, so let's go
2 forward with the AT&T questions and I will
3 attempt to move fairly quickly, so please don't
4 be shy about interrupting to get a question in.

5 AT&T question number 1 points out a
6 mistake, an omission KPMG made in the report.
7 We will correct this in the issuance of the
8 final report.

9 Question number 2. The question is,
10 "Other than to CLECs, what other external
11 delivery is made of the records in EMI format?

12 And we are not aware of any other
13 distribution of the DUF records.

14 MR. CONNOLLY: Is there an internal
15 distribution of the EMI format to accommodate
16 the -- sorry.

17 MR. DELLA TORRE: Not that we are
18 aware of. We did not assess that, either.

19 MR. CONNOLLY: So the records are
20 not reformatted for internal use --

21 MR. MAY: We don't know.

22 MR. CONNOLLY: Thanks.

23 MR. DELLA TORRE: Okay. Question
24 number 3. Please confirm that the "guide file"
25 criteria for determining which CLEC should

1 receive which DUF records include effective
2 date and working telephone number/billing
3 telephone number.

4 And we have not reviewed the
5 specific guide file layout.

6 We certainly would expect that the
7 guide file entries would minimally contain
8 working and billing TNN. But we did not assess
9 that.

10 MR. CONNOLLY: Our question was on
11 the criteria for determining where or to which
12 CLEC usage is routed or provided. Does it
13 consider these criteria we have listed.

14 MR. WEEKS: The answer to your
15 question is the nature of this test was an
16 external kind of black box test. We didn't go
17 inside the walls at Qwest and look at the
18 details of how they set these files up. All we
19 did was look to see if it appeared the usage we
20 had created got correctly routed to us. We
21 don't know Qwest's internals on this.

22 MR. CONNOLLY: When you set your
23 expectations for which usage records you were
24 to receive --

25 MR. DELLA TORRE: In fact, I am

1 sorry to interrupt but we did receive,
2 inappropriately receive, DUF files that didn't
3 belong to us. And we did raise an exception
4 about that.

5 So in the spirit of the black box
6 test we were receiving DUF files, we reviewed
7 if we should have received them and, in some
8 cases, they were mistakenly sent to us, we
9 raised an exception and we did not note the
10 problem again in subsequent retesting.

11 MR. CONNOLLY: Right. When you set
12 your expectations for what you should receive,
13 were the criteria by which you based that these
14 that we have identified here.

15 MR. WEEKS: They were the calls we
16 had made which implied use of these. It was
17 who owned circuit at the time the call was made
18 is what set our expectation about which calls
19 should be in the DUF file.

20 MR. CONNOLLY: So date is an
21 important matter, the originating number, the
22 billing number, that is material.

23 MR. HOWARD: This is Van Howard with
24 KPMG Consulting. Qwest stated ownership rules
25 are usage will start to flow on the ordered

1 completion date plus 1.

2 MR. DELLA TORRE: Just as a check
3 for audio could folks on the bridge hear Van
4 just now with that answer?

5 A VOICE: No.

6 MR. HOWARD: Qwest stated ownership
7 rules are usage will migrate to the new owner
8 of the account the day after the service order
9 completes (inaudible).

10 MR. CONNOLLY: And does that same
11 criteria apply for a CLEC migration back to
12 Qwest, that the date, the trigger date for the
13 call is made, to go to Qwest, would be
14 completion date plus 1?

15 MR. HOWARD: I would assume so, we
16 don't have visibility on the retail side.
17 There really is no retail equivalent of a DUF
18 for us to look at. In our observation the
19 usage did cease coming to us. Whether it went
20 back to Qwest or not, I don't know. It stopped
21 coming to us.

22 MR. CONNOLLY: -- on the date that
23 was the same as the completion date and no more
24 than that?

25 MR. HOWARD: Correct.

1 MR. CONNOLLY: Thanks.

2 MR. DELLA TORRE: AT&T question
3 number 4: In the test scenarios, "Migrations
4 back to Qwest," are these order types also
5 known as "winbacks?"

6 The answer is yes.

7 Question 5: What ordering
8 system/interface was used by the P-CLECs to
9 place the orders "migrations back to Qwest"?

10 The P-CLEC did not place these
11 orders.

12 MR. FINNEGAN: Is that something you
13 would request Qwest to do?

14 MR. DELLA TORRE: Yes, right.

15 Question 6. Please explain the
16 reasons that "service orders that included a
17 specific due date" is a requirement of Test 19.

18 Test calls are placed during a
19 predetermined period of time. Those orders are
20 therefore issued with a specific due date. It
21 essentially enables us to have our folks out in
22 the field to generate pre-migration activities
23 and post-migration activities which is why we
24 require a specific due date and knowledge of
25 that due date.

1 MR. CONNOLLY: There were a variety
2 of specific due dates, were there not? There
3 was not a specific one --

4 MR. WEEKS: There was one for each
5 test.

6 MR. HOWARD: During a single -- I'm
7 sorry, Van Howard again.

8 During a single test calling period
9 we normally utilized one due date for
10 migrations to the CLEC. We used a second date
11 during the test calling period for winbacks,
12 suspends and disconnects during the test
13 calling period.

14 Question 7: Did KPMG make test
15 calls that included requests to a Qwest
16 operator to adjust the elapsed time of a call
17 due to poor transmission quality?

18 The answer is yes.

19 MR. CONNOLLY: Tim Connolly with a
20 clarifying question. Could you show us or
21 identify in Table 19-3 where that type of call
22 is reflected.

23 MR. DELLA TORRE: We mistakenly
24 omitted that from the report and will make a
25 correction to the final.

1 MR. HOWARD: Table 19-3 has two
2 broad categories in it, operator refund for
3 local telephone calls and operator refund for
4 toll telephone calls. All of our credit work
5 basically -- that is a broad category.
6 Anything we did for cutoff, poor transmission,
7 wrong number. But if -- we can clarify that.

8 MR. DELLA TORRE: Question 8: Did
9 KPMG Consulting make test calls that included
10 requests to a Qwest operator to give credit for
11 a call that was dialed correctly but that
12 yielded a connection to a wrong number?

13 Our testers did request wrong number
14 credits and verified that appropriate credits
15 were received.

16 However, we could not create an
17 operator mistake.

18 MR. WEEKS: We tried.

19 MR. CONNOLLY: The intent of the
20 question, or I wasn't looking for an operator
21 mistake, I was looking for a customer who made
22 a call, realized they got a wrong number --

23 MR. WEEKS: We interpreted your
24 question to mean there was an error made by a
25 Qwest person and that is how you got to the

1 wrong number. You were asking did we
2 intentionally call a number that was a wrong
3 number on our part like 414 instead of 144 or
4 something.

5 MR. DELLA TORRE: The answer is
6 yes, we did do that.

7 MR. CONNOLLY: Would we find that
8 type of call reflected in a modified 19-3?

9 MR. HOWARD: It falls under the same
10 broad category, yes.

11 MR. CONNOLLY: Thanks.

12 MR. DELLA TORRE: Question 9:
13 Please describe what is meant by the term
14 "FLOATER."

15 A floater is a test caller outside
16 of the calling region dialing and placing third
17 party or collect calls to the test line.

18 MR. WEEKS: It's a dead body in the
19 East River.

20 (Laughter.)

21 MS. ANDERSON: We might be able to
22 write that one in.

23 A VOICE: He would have said dead
24 body in the Platte, but it's not deep enough.

25 MR. DELLA TORRE: After two weeks

1 the floater becomes a bloater.

2 MS. ANDERSON: We may want to move
3 on, I believe.

4 (Laughter.)

5 MS. ANDERSON: I believe that
6 question has been asked and amply answered.

7 MR. DELLA TORRE: Question 10:
8 "The test calls consisted of commonly placed
9 incoming and outgoing call types generated over
10 multiple switch types." A quote from our
11 report. Are the common types among those
12 contained in Table 19-3?

13 The answer is yes.

14 Question 11: Quote from our report.
15 "KPMG Consulting recorded details of all calls
16 placed for later comparison to DUF records."
17 Please confirm that the details were recorded
18 manually.

19 In fact the details were recorded
20 both manually and mechanically.

21 Follow-up question: Please identify
22 the details that were recorded for each test
23 call.

24 The details are test site, type of
25 call, date and time, from and to number,

1 duration.

2 We also noted if the call was
3 completed or not completed and in some cases we
4 captured the alternate billing number and the
5 type of operator service used.

6 MR. CONNOLLY: Thanks, Joe.

7 A question on follow-up to the
8 recording method for your test calls.

9 Could you explain the electronic
10 means by which those call details were
11 recorded.

12 MR. DELLA TORRE: Certainly.

13 MR. HOWARD: Yes, this is Van Howard
14 again. We have equipment that we use in the
15 Philadelphia office that allows us to place a
16 remote unit in the field and dial the calls
17 mechanically and predictably and it has a
18 automatic log-in feature that captures the
19 details of the call-in. That was the substance
20 of our mechanical log-in.

21 MR. CONNOLLY: Thank you, Van.

22 MR. HOWARD: You are welcome.

23 MR. FINNEGAN: John Finnegan again
24 with a little different question.

25 Did KPMG compare either the call

1 logs or DUF records to the wholesale bills?

2 MR. HOWARD: Yes, my team did that
3 as part of Test 20.

4 MR. FINNEGAN: If a call didn't show
5 up, let's say on that first test where there
6 was the 69 percent of the DUF records showed
7 up, did you find that the call also didn't show
8 up on the wholesale records?

9 Was there any consistency in what
10 showed up and what didn't show up for the DUF
11 versus the wholesale bill?

12 MR. HOWARD: We do, as a matter of
13 fact, validate every DUF record we receive
14 irrespective of whether it matched the calls we
15 intended to place, are matched to the wholesale
16 bill.

17 MR. DELLA TORRE: There is
18 crossover between Test 19 and 20 because there
19 is validation of Test 20 on the bills.

20 MR. WEEKS: (Inaudible) When we
21 found a DUF record was missing did we also find
22 there was not a charge for that on the CLEC
23 bill.

24 MR. HOWARD: We just reconciled DUF
25 records to the bills. So the answer is I don't

1 know.

2 MR. FINNEGAN: Just to make sure I
3 understand in that first test where there was
4 31 percent of the records that didn't show up
5 on the DUF, you don't know if 31 percent of the
6 records didn't show up on the wholesale bill,
7 as well?

8 MR. HOWARD: Not based on the
9 scripts, no.

10 MR. FINNEGAN: Conceivably we still
11 could have been billed for those on a wholesale
12 basis even though they didn't show up on the
13 DUFs?

14 MR. DELLA TORRE: We did validate
15 those bills for that period using the DUF
16 records in hand.

17 For the DUF records we didn't have,
18 we didn't review those on the bills. However,
19 when we were reviewing the call records
20 represented on the bills, we would have made
21 note of calls that were not one of the DUFs --
22 the DUF records that we had in hand and we did
23 not see any of those.

24 So there were no call records on the
25 bill that we didn't have a corresponding DUF

1 record for. Thank you.

2 Question 12: Please confirm that
3 the date of the "creation of each message" is
4 the date recorded in the call detail by the
5 Qwest switch and the connected Automatic
6 Message Accounting ("AMA") equipment.

7 The answer is yes, that is correct.

8 Question 13. Please explain any
9 differences in method for calculating BI-1A
10 when performed by KPMG and when performed by
11 Qwest.

12 And the answer here is we can't
13 necessarily confirm differences between how we
14 do it and how Qwest does it, because we did not
15 evaluate how Qwest calculates this pick. But
16 we did utilize the formula specified in the
17 definition of BA-1A with one exception, we also
18 included access records, because we used all of
19 the DUF records. We did do both calculations
20 and there was no material difference between
21 them including or excluding the access records.

22 Question 14: Please identify the
23 reference source used to establish the EMI
24 guidelines.

25 And it's the exchange message

1 interface industry support interface, version
2 issue 17, revision number 1.

3 MR. FINNEGAN: A follow-up. This is
4 specific to exceptions 30-17 and 30-18.

5 It appeared that when the exceptions
6 were initially released there was an
7 expectation that long distance DA calls should
8 have showed up on a 110132 record and that an
9 information provider call should have showed up
10 on a 110116 record.

11 The Qwest response was no it really
12 should show up on a 110101 record.

13 Was there that much latitude in the
14 EMI standard to create this different
15 expectation where KPMG had one expectation and
16 Qwest had a different expectation?

17 MR. DELLA TORRE: Well, just as a
18 first comment to set the stage, it's not an EMI
19 standard, it's an EMI guideline. The ILEC does
20 have the discretion to employ those as they do,
21 as long as the expectations are properly set in
22 their own internal documentation that they then
23 provide to the CLEC community.

24 And there is a question later on as
25 to whether or not we gave some degree of

1 latitude. And the answer to that is yes,
2 because the EMI are guidelines.

3 Would you like to enhance that in
4 any way?

5 MR. HOWARD: I think you have
6 covered it just fine.

7 MR. FINNEGAN: Let me make sure I
8 understand then. Does the guideline say, for
9 instance, long distance DA should be on a 132
10 record?

11 MR. HOWARD: The guideline allows
12 for that. We had seen that in other testing
13 experience elsewhere. That is how the
14 expectation is based. Those records are
15 (inaudible).

16 MR. FINNEGAN: Are the guidelines
17 such that they say for a long distance DA it
18 should be a 132 record but you can do whatever
19 you want?

20 MR. HOWARD: EMI guidelines provide
21 very granular record types. In fact the 110101
22 record supports the exact same fields as in the
23 110132 and the 110133 record, so there's no
24 information lacking based on the fact that
25 Qwest chooses to use a 110101 record rather

1 than 110116 and 110132 record.

2 MR. DELLA TORRE: We formed our
3 expectations based on what Qwest publishes as
4 the appropriate use for that field which is the
5 01 or 011 on their web site.

6 MR. FINNEGAN: That I understand.
7 But the question is are the DUF records adhered
8 to the EMI guidelines. And it sounds like the
9 EMI guidelines suggested you should do a 132,
10 but you can do whatever you want.

11 The finding of "satisfied for this
12 criteria" was they were complying with you can
13 do whatever you want.

14 MR. WEEKS: As long as you publish
15 it and it's functionally equivalent and it's
16 per the guidelines, you are allowed latitude.

17 So you don't have to blind adhere to
18 the guidelines is the bottom line. As long as
19 you publish what you are going to do in the
20 documentation, which they did, you are allowed
21 to vary from the guidelines as long as you
22 publish your variances.

23 MR. CONNOLLY: Were your original
24 expectations not based on Qwest's documentation
25 but on your previous testing experience?

1 MR. HOWARD: That's correct.

2 MR. WEEKS: That's correct.

3 MR. DELLA TORRE: Question 15:
4 Please provide a description/definition of
5 "correct owner" as used in this test.

6 The correct owner is the proper
7 recipient of the DUF record based on type of
8 call placed, the date of the call, the class of
9 service and the effective date based on the CSR
10 received and Qwest's usage ownership rules
11 which state as mentioned earlier that usage
12 ownership transitions the day following the
13 migration.

14 Question 16: Please confirm that
15 the DUF records that were not provided as
16 expected were not provided later than expected.

17 And that's correct.

18 Question 17: Please confirm that
19 Qwest charges CLECs for the provision of type
20 110101 records that have no duration.

21 It's your understanding Qwest does
22 not charge for providing CLECs with DUF
23 records.

24 Question 18: Please provide an
25 explanation for the reason the call volumes or

1 count do not match the count of scripts in
2 Table 19-8.

3 Scripts are more of an internal
4 testing mechanism. And there is the potential
5 for a one-to-many relationship or a one-to-one
6 relationship between scripts and DUF records.

7 Question 19: Please identify the
8 number of DUF records that were expected to be
9 received, but that were not, in contrast to the
10 8,888 calls that were received.

11 And we did not calculate the number
12 of DUF records not received. This is due to
13 the same condition I mentioned in the previous
14 question, that there is a one-to-one or
15 one-to-many relationship. So if we don't -- if
16 an entire script is lost it could be multiple
17 DUF records.

18 Other questions on AT&T's section?

19 Moving on to WorldCom.

20 Question 1: Were the test calls
21 that were made before, during, and after
22 migration to validate correct DUF routing for
23 all three migration scenarios (Qwest to CLEC,
24 CLEC to CLEC, and CLEC to Qwest)?

25 The answer is yes.

1 Question 2: What was the quantity
2 of the established test bed accounts used for
3 KPMG's DUF evaluation?

4 Really here the more significant
5 quantity is the number of telephone numbers,
6 which was 219. It was across 153 accounts.

7 Question 3: Did the mix of switches
8 from which the test calls originated include
9 all types of switches used by Qwest?

10 We are unable to confirm if, in
11 fact, it was a comprehensive set of all
12 switches used by Qwest, but what we did test
13 was the 5ESS, DMS100, AXRSS and their TOPS
14 switches.

15 MR. WEEKS: Would Qwest like to
16 comment on whether there are any other type
17 switches listed other than those listed in the
18 network.

19 MR. SIMONSON: Scott Simonson.
20 There are some VNS10s in the network in
21 suburban areas, our suburban areas.

22 MR. DELLA TORRE: Question 4:
23 Please specify what details were captured, and
24 how they were documented, for the test calls to
25 be compared to the DUF records.

1 This is similar to the AT&T
2 question, but, very briefly, we captured that
3 information both manually and electronically as
4 explained moments ago. The details we captured
5 were test site, type of call, date and time,
6 from and to number and duration.

7 We also noted if the call was
8 completed or not and in certain, for certain
9 calls we captured alternate billing number and
10 the type of operator service used.

11 Question 5: Please clarify how KPMG
12 determined that Qwest's DUF records adhered to
13 EMI guidelines. Specifically, did KPMG allow
14 for some discrepancies between Qwest's DUF
15 records and EMI guidelines.

16 And we did allow for interpretation.
17 We wouldn't categorize those as discrepancies.

18 Question 6: Was Qwest's explanation
19 of its unique generation you have 800 call type
20 records for the Central Region documented
21 within any Qwest documentation?

22 The answer is no.

23 Question 7 --

24 MS. OLIVER: Excuse me. Becky
25 Oliver with WorldCom. This is a follow-up on

1 question 6.

2 If it wasn't documented, how did
3 KPMG determine this information and take that
4 into account in their evaluation.

5 MR. HOWARD: Becky, this is Van
6 Howard. We got a specific answer from Qwest in
7 an observation that we wrote noting we had
8 received two different permissible EMI record
9 types for toll-free calls. Qwest documentation
10 does specify that they will generate an 110105
11 and an 110125 record, but it does not give the
12 regional specifics as to which type of record
13 comes from which region.

14 MS. OLIVER: Thank you.

15 MR. DELLA TORRE: Question 7: Did
16 KPMG evaluate the accuracy of the count in the
17 DUF Trailer record for every DUF file
18 transmitted?

19 The answer is yes.

20 For question 8. Please clarify the
21 data from different months was used for
22 comparing the timeliness of receipt of the
23 P-CLEC's DUF files with Qwest's retail. If so,
24 why?

25 Our test footnotes will be corrected

1 here. In fact it was June 2001 DUF data
2 compared too June 2001 retail results. So that
3 was a mistake.

4 Okay. We will move forward to the
5 State of Washington questions.

6 MR. WEEKS: With apologies to Tom
7 and Dave in VTC 2 we inadvertently skipped over
8 the kind of standing questions that were
9 provided to us and will attempt to cover those
10 as we go through each of the sections.

11 The essence of those questions as I
12 recall them were along the lines of what
13 specific state results apply and in this case
14 we don't have information that breaks this
15 particular set of activities down by state in
16 our report.

17 And then there were also questions
18 asked about the then state of things where
19 there might have been things not satisfied and
20 unables and so on.

21 All evaluation criteria in this
22 particular test are (inaudible) and satisfied
23 so I don't think those questions apply in this
24 case. Did I leave anything out or do you want
25 to --

1 MR. SPENCE: Tom Spence of
2 Washington.

3 MR. DELLA TORRE: Can we pass a
4 microphone back to Tom?

5 MR. SPENCE: Thank you. I think the
6 second question went to whether there were any
7 unresolved Os or Es.

8 MR. WEEKS: And there are not in
9 this case.

10 MR. DELLA TORRE: That concludes
11 Test 19 unless there are other questions.

12 I believe our -- in the past we have
13 typically needed five or ten minutes to go
14 between one section to the next. However in
15 this case because Test 20 is coming next and
16 it's the same crew of personnel here I think we
17 can jump right into Test 20.

18 (Pause.)

19 MR. DELLA TORRE: We are all set
20 folks. This is Test 20.

21 MR. WEEKS: I will start with the
22 standing questions from Washington state.

23 These are all satisfied so there
24 aren't any of the them-to-us kinds of answers
25 for the sets, not sets. There aren't any open

1 observations or exceptions in this report nor
2 are there any state-specific results that we
3 have broken out.

4 So I think that is the spirit of
5 those questions. Any follow up from
6 Washington?

7 MR. DELLA TORRE: Okay. We will go
8 with AT&T and promise WorldCom we will start
9 with yours next.

10 Question number 1, AT&T: Please
11 confirm that the regional CRIS systems provide
12 like functions but are not the same systems.

13 That is correct. There are three
14 different systems that do provide like
15 functionality.

16 Question 2: Please confirm that
17 Qwest operates --

18 MS. OLIVER: Excuse me. May I ask a
19 follow-up question?

20 MR. DELLA TORRE: Of course.

21 MS. OLIVER: The like functionality
22 are the differences associated, let me say it
23 this way. Are the differences between the
24 regional CRIS systems just due to regional
25 differences?

1 MR. DELLA TORRE: That's correct.

2 MS. OLIVER: Thank you.

3 MR. DELLA TORRE: Question 2:

4 Please confirm that Qwest operates a single
5 IABS system.

6 That is correct.

7 Question 3: Same question for the
8 BART system.

9 And there is only one. There is a
10 single BART system.

11 MR. CONNOLLY: Excuse me, Joe, on
12 follow-up.

13 We asked a supplemental question or
14 a secondary question anyway that asks you to
15 explain if there is any regional considerations
16 within these single IABS and BARTs
17 applications.

18 MR. DELLA TORRE: My apologies. We
19 read this as cannot be confirmed so there is
20 the subsequent portion. So my mistake.

21 The answer is no.

22 MR. WEEKS: We are not aware of any
23 regional differences baked into the (inaudible)
24 system.

25 MR. DELLA TORRE: That is also true

1 for IABS.

2 Question 4: Are the CLEC to Qwest
3 migration situations also known as winbacks?

4 The answer is yes.

5 Question 5: Please explain whether
6 KPMG verified wholesale bills for the presence
7 and accuracy of taxes and jurisdiction-specific
8 charges.

9 In fact the P-CLEC was set up as tax
10 exempt, therefore no taxes or jurisdictional
11 surcharges were assessed.

12 Question 6. -- sorry.

13 MR. CONNOLLY: Is it KPMG's opinion
14 that surcharges on the wholesale bills are all
15 tax related? There is no surcharges for being
16 a CLEC or being a certain kind of CLEC?

17 MR. WEEKS: We did not see any kind
18 of surcharges or anything, tax for being in
19 business, so to speak, on the bills that were
20 rendered to us. So therefore, if other CLECs
21 are getting those, it's not something we saw
22 and we wouldn't be able to comment on that.

23 MR. CONNOLLY: Would you know if the
24 absence of those surcharges was appropriate or
25 not?

1 MR. WEEKS: We don't know either
2 way.

3 MR. DELLA TORRE: Question 6: Are
4 the Provisioning Completion Notices Service
5 Order Completions, Work Completion Notices or
6 Billing Completion Notices?

7 In fact, there was confusion around
8 the language and we inadvertently used the term
9 Provisioning Completion Notice in place of the
10 Service Order Completion, or an S-O-C. And we
11 will revise the final report to reflect that
12 what we were referencing was the Service Order
13 Completion, or SOC.

14 MR. CONNOLLY: So none of your
15 expectations were driven off or none of your
16 results and analysis were driven off the
17 provision of billing Completion Notice? Is
18 that correct?

19 MR. DELLA TORRE: That's correct.

20 Question 7: How is KPMG able to
21 acquire retail end user bills to verify the
22 cessation of billing as of the migration date?

23 KPMG and Qwest have worked out in
24 advance of the test a method of retrieving
25 retail bills in addition to the appropriate

1 wholesale bills.

2 MR. CONNOLLY: Were these sort of
3 the in-house Qwest copies of the bills.

4 A VOICE: No, they were the actual
5 bills set up by (inaudible) --

6 MR. CONNOLLY: So they were what,
7 intercepted on the way out to the retail end
8 user, or --

9 A VOICE: No, we were the end user.
10 We had different names that we received those
11 bills on our site.

12 Question 8: KPMG states: "KPMG
13 Consulting also examined bill that contained
14 usage charges for billable messages to verify
15 the accuracy of the usage billing components,
16 rates and quantities.

17 Question: Did these examinations
18 utilize wholesale bills and retail bills?

19 We did not utilize the retail bills
20 in this evaluation.

21 Question 9: What is KPMG's
22 understanding of the relationship between
23 invoices and bills.

24 We used that term interchangeably
25 and we will make revisions to the report so

1 that the -- all references to invoice in Test
2 20 will be changed to the word "Bill."

3 Question 10: What is KPMG's
4 understanding of the relationship between
5 billing date and the date of processing bills
6 for a given billing date?

7 The bill date represents the start
8 of the billing period and a bill period is
9 typically 30 calendar days. The billing
10 processing typically begins a few days after
11 the bill date.

12 At bill processing the billing data
13 that has been collected since issuance of the
14 last bill are extracted and formatted for bill
15 presentation.

16 MR. CONNOLLY: Is the data of
17 processing the bills, is that a fixed interval
18 between bill date and what that date is or is
19 it -- how is it determined what that date is.

20 MS. FUCCILLO: It's typically --
21 this is Liz Fuccillo, KPMG Consulting. It's
22 typically two to three business days following
23 (inaudible.)

24 MR. CONNOLLY: Let me think through
25 this for a second.

1 MS. ANDERSON: Could folks on the
2 bridge be sure your mute button is on? We are
3 getting some scratching sounds here that we are
4 hearing quite well. So if you could please
5 mute your phones on the bridge. Thank you.

6 MR. CONNOLLY: If we say for example
7 that the bill date is the 10th, so it's the
8 10th of every month marks the start of that
9 billing cycle for that wholesale customer, the
10 processing date to generate the bill for the
11 10th of May would start two or three days after
12 the 10th of May; is that correct.

13 A VOICE: Yes, that's correct.

14 MR. WEEKS: Two or three business
15 days.

16 MR. CONNOLLY: Business days.

17 So by that time is it KPMG's
18 expectation that all of the charges up to the
19 9th of May would have been in Qwest's system
20 and would be output on the bills, the wholesale
21 bills data?

22 MR. GORALSKI: This is Joe Goralski.
23 As far as the -- if we are talking about
24 service order activity hitting before that
25 period of time, it depends on when the service

1 order actually stopped and when it will
2 actually hit the bill. It doesn't necessarily
3 have to hit the bill for that bill cycle. If
4 it's a complex order it may take until the next
5 bill cycle, but it will appear within two bill
6 cycles.

7 MR. CONNOLLY: So let's take this
8 complex order that has a completion date of May
9 9th. Would it be your expectation that that
10 order, charges for that order, the
11 non-recurring charges in particular, should be
12 on the wholesale bill dated the 10th of May?

13 MR. GORALSKI: It depends. If it's
14 a complex order and if it completes on the 9th,
15 if the provisioning part of it come completes
16 on the 9th it doesn't mean it will post on the
17 bill on the 9th, it may not post until the 10th
18 or 11, so it conceivably could miss the bill
19 cycle.

20 MR. CONNOLLY: If the service order
21 completion notice, the SOC we talked about in
22 our question number 6.

23 MR. GORALSKI: Right.

24 MR. CONNOLLY: If that is dated May
25 9, aren't the charges for this order due on the

1 May 10th wholesale bill?

2 MR. GORALSKI: Our answer is not
3 necessarily.

4 MR. WEEKS: That is our
5 understanding, that it's not necessarily.

6 MR. CONNOLLY: If they don't appear
7 on the May 10th bill but appear on the June
8 10th bill those are late according to BA3;
9 isn't that correct.

10 MR. GORALSKI: If we are going with
11 SOC plus 1 and are talking about the 9th and
12 the 10th is the bill date, it would appear on
13 the 10th, but that is not SOC plus 1, the bill
14 date is already passed or is on that bill date.

15 So in our opinion it is not late.

16 MR. CONNOLLY: But since the cutoff
17 is -- is the cutoff somehow related to the
18 10th, are the work days two or three days hence
19 from the 10th?

20 MR. WEEKS: I think our answer to
21 you is that it's the billing completion notice
22 date that is more indicative of when it's going
23 to appear on the bill than the SOC date. Those
24 two do not have to be the same date.

25 MR. CONNOLLY: I misspoke before

1 when I said it's late, it would be showing up
2 at BI3. I was reminded that is a BI4.

3 What I am trying to figure out, I am
4 trying to figure out how -- if it doesn't show
5 up on the May 10th bill, and it shows up on the
6 June 10th bill, and the date that we go by is
7 the service order completion date, what does
8 any other date have to do with it?

9 MS. FUCCILLO: I can answer that.

10 The service order completion date
11 isn't necessarily the same as the posted to the
12 bill date, which is the BCN date. It may be
13 the same, but it's not necessarily the same. .
14 The posted to be billed date with the BCN is
15 the date that would allow the CLEC to
16 understand what the next available bill that
17 those charges should appear on.

18 So in your example if you had an
19 order, with a bill date of the 10th, the order
20 completed on the 9th, if the CLEC received a
21 BCN carrying the 9th as the due date the CLEC
22 should expect that, those charges to appear on
23 the 10th or the May 10th bill.

24 However, if it was, if that same
25 scenario carried a BCN date of the 11th, you

1 may not expect that order or charges associated
2 with that order to appear on the next bill.
3 But the June bill.

4 So the BCN is the driver for your
5 expectations.

6 MR. CONNOLLY: In which part of your
7 testing did you look at the relationship
8 between the service order completion date and
9 this billing completion notice date.

10 MS. FUCCILLO: We did not. At the
11 start of our test we were not getting BCNs. So
12 in place of that we used the SSC.

13 MS. ANDERSON: Excuse me. I think
14 this is one of those where, if you recall, we
15 had PO6 back in the very beginning. And then
16 Qwest agreed to split it out to be a work
17 complete and a billing complete. And that took
18 place somewhere in the middle of the test.

19 I believe it was indicated in the
20 MTP as not in scope for the test.

21 Am I recollecting this? Does anyone
22 else have this recollection? We can research
23 it.

24 Chris, you are pretty good at this
25 stuff. Does anything I am saying, is it

1 vaguely familiar.

2 MR. VIVEROS: Yes, it is familiar.

3 MS. ANDERSON: Can we get you a
4 microphone please? Sorry for the interruption,
5 but this is one of those --

6 MR. VIVEROS: When we started the
7 test there was only a single measure of
8 completion and it was based on service order
9 and we did split it out.

10 But my recollection is slightly
11 different though. I think we did acknowledge
12 that there was some work within the scope of
13 the test on the areas that P06 and 7 cover.
14 Those measures had a diagnostic standard at the
15 time we started the test. And to be brief,
16 they would (inaudible) be evaluated
17 (inaudible).

18 MS. ANDERSON: That's correct. I
19 used the wrong phraseology.

20 MR. DELLA TORRE: That confirms our
21 understanding as well. Bob Falcone is giving
22 me nods across the room.

23 MS. ANDERSON: I don't know if that
24 helps clear up or muddies the water, but --

25 MR. DELLA TORRE: Tim, John, let's

1 get that (inaudible) back.

2 MR. FINNEGAN: Would that change
3 your response to AT&T question 6, then? AT&T
4 question 6, it appeared the answer was the SOC,
5 the service order completion, was what you base
6 your expectations on. Since then I am hearing
7 you base your expectations on the billing
8 completion notice.

9 MR. DELLA TORRE: We didn't base
10 our expectations on the billing completion
11 notice. What Liz had said before was that the
12 billing completion notice is the most accurate
13 representation, the most accurate date to
14 reflect that the billing -- that billing has
15 been updated and completed.

16 We continue to use the SOC plus 1 as
17 our expectation.

18 So in fact the BCN probably would
19 have been more accurate at the later stages of
20 the test. However, we had started the test and
21 ended the test with the same mechanism which
22 was SOC plus 1.

23 MR. FINNEGAN: Okay, Well, then I
24 am still confused, because in the example we
25 talked about the SOC was on the 9th, SOC plus 1

1 would have been the 10th and if it didn't show
2 up on the May 10th bill --

3 MR. WEEKS: It was late for the
4 test.

5 MR. FINNEGAN: I thought the answer
6 was you said it wasn't late.

7 MR. WEEKS: No, I think we said it
8 depends, was our better answer.

9 MR. MAY: I am being told Liz may
10 have mentioned it didn't receive --

11 MR. WEEKS: In the beginning,
12 because they didn't exist from the beginning.

13 MS. FUCCILLO: I believe then, for
14 the purposes of this test, the billing test did
15 not rely on BCNs. We were not aware they were
16 available to us, so in lieu of the BCN we used
17 the SOC plus 1.

18 MR. DELLA TORRE: So regardless of
19 whether they were or not, that is what we did.

20 MS. ANDERSON: And I don't believe
21 we were available at the beginning of the test.

22 MR. WEEKS: Don says they were.

23 MS. ANDERSON: Well, I find -- I
24 find that hard to believe, because we went
25 through this and beat it to death.

1 But to just add one additional
2 thing, Bob Falcone, there was a diagnostic
3 evaluation of PO6 and PO7. What test is that
4 in?

5 MR. FALCONE: It's in test 12. We
6 will discuss that tomorrow.

7 MS. ANDERSON: We may want to
8 continue this dialogue at that point.

9 MR. FINNEGAN: (Inaudible) I
10 apologize if I am beating this to death, but I
11 am still confused. Let's go with there was no
12 BCN. In that example, service order completion
13 the 9th, bill date is the 10th, why the "it
14 depends" answer if you establish your
15 expectations on service order completion
16 plus 1?

17 MR. WEEKS: Which was inappropriate.
18 We should have been using BCS. So what we used
19 as our yardstick in the test is at variance
20 with what we should have been using as our
21 yardstick in the test and that is why the
22 answer depends whether the BCN and SOC 1 was
23 the same date. If those were the same date
24 we'd be fine; if they weren't we wouldn't.

25 MS. FUCCILLO: John, I am sorry, I

1 probably gave more information than you needed
2 and that caused that confusion.

3 Early on in the test we issued an
4 observation for late orders, if you will. We
5 based that observation on the SOC plus 1.

6 Qwest's response to us provided us
7 additional information and said that some of
8 the orders we cited in that observation
9 actually did not post a bill on that date that
10 we would have expected. For instance it fell
11 out for correction on manual handling.

12 So in those instances we had to go
13 back and correct our expectation.

14 So when our expectation, SOC plus 1
15 happened to be in sync with the BCN date, then
16 that's fine.

17 But in other cases the SOC plus 1
18 didn't actually work out. In those instances
19 Qwest provided us that detail, as to why the
20 two dates didn't line up.

21 MR. FINNEGAN: And when they didn't
22 line up you used the BCN date?

23 MS. FUCCILLO: Exactly. We used the
24 date provided by Qwest for the BCN, yes.

25 MR. FINNEGAN: So it was -- if I

1 understand the -- I think I understand it.
2 Then the answer to question 6 should have been
3 you used both the service order completion and
4 billing completion in order --

5 (Simultaneous speaking).

6 MS. FUCCILLO: Yes.

7 MR. WEEKS: That would be more
8 accurate.

9 MS. FUCCILLO: That would be more
10 accurate.

11 MR. FINNEGAN: Okay. Thank you.

12 MR. CONNOLLY: Just another two or
13 three questions on this billing date, this
14 element.

15 What was your -- what did you
16 observe for the usage records that were being
17 billed according to this billing date plus a
18 couple of days to generate the usage part of
19 the wholesale bill?

20 Did you see calls using this 10th
21 billing period, did you see calls dated the 9th
22 on the 10th period bill, or did you see them on
23 the following month's 10th --

24 MR. HOWARD: We did see some
25 instances where usage for a specified test

1 calling period was on more than one month's
2 bill.

3 After we ran the initial tests there
4 were some problems. Qwest's sensitivity
5 pending order activity, so that usage is held,
6 so that when it is released on the daily usage
7 file it is in alignment with Qwest's stated
8 usage ownership rules.

9 In some cases that did cause some of
10 the usage to bill on the period one would
11 expect based on the call date and in some cases
12 because of this process it billed on the
13 following month's bill, portions of the bill on
14 the following month's bill.

15 MR. CONNOLLY: So for usage billing
16 purposes, is it your opinion that the two-to
17 three-day window, if you will, is that
18 sufficient to get all the usage on the 9th on
19 the May 10th bill?

20 MR. HOWARD: I am sorry, two-to
21 three-day window --

22 MR. CONNOLLY: Start processing the
23 bill two to three work days after the 10th.

24 MR. HOWARD: Typically, yes, that
25 would be our expectation.

1 MR. CONNOLLY: What was your
2 experience?

3 MR. HOWARD: On some EC orders there
4 was a delay of a month on disconnect
5 (inaudible) where there were multiple orders
6 behind the scenes of the actual provisioning
7 activity. We did see that usage would come in
8 a month later than we expected.

9 MR. CONNOLLY: And how about for
10 cases where there was no order activity at all?

11 MR. HOWARD: Those came in just as
12 we would have expected on the next available
13 bill.

14 MR. CONNOLLY: So retail customer,
15 no usage, making local calls on the 9th, all of
16 those calls would be on the 10th period -- the
17 May 10th period bill?

18 MR. HOWARD: When there was no order
19 activity on the account?

20 MR. CONNOLLY: Right.

21 MR. HOWARD: That's correct.

22 MR. CONNOLLY: Thank you.

23 MS. OLIVER: Becky Oliver. I would
24 like to ask a follow-up question.

25 I understood that KPMG used the SOC

1 plus 1 criteria. And in cases where that
2 criteria showed a late result, you looked to
3 Qwest to provide the BCN or post to bill date
4 and then used that additional data to determine
5 was it really late or not.

6 My question is, was there any
7 validation by KPMG of that post to bill date or
8 was that simply data that you received directly
9 from Qwest?

10 MS. FUCCILLO: When we noted
11 differences in our expectation, we raised an
12 observation. And in Qwest's response to that
13 observation they provided additional detail
14 that would tell us that that particular order
15 did not post to bill. And so we accepted that
16 without validating it. Yes.

17 MS. OLIVER: Just one more
18 follow-up. The post to bill dates, the time
19 period between service order completion and
20 post to bill, did you find, in these cases
21 where you did have to look at the post to bill
22 date, that the time period between SOC and BCN
23 varied?

24 MS. FUCCILLO: Yes.

25 MR. DELLA TORRE: Question 11:

1 What is KPMG's understanding of the meaning of
2 "adjustments due to errors?" What is the
3 meaning assigned to "error"?

4 KPMG Consulting's understanding of
5 the meaning "adjustments due to error" are
6 adjustments made by Qwest that are a result of
7 a billing error.

8 We defined billing errors as
9 inaccuracies in recurring, non-recurring
10 proration calculations and discounts.

11 MR. CONNOLLY: I think I heard
12 earlier, maybe in Test 19, Van, did you say
13 there were DUFs that were provisioned in error.
14 Were there also bills -- calls billed in error?

15 MR. HOWARD: Our experience was we
16 did in some cases receive DUF records that did
17 not appear on a bill and caused some
18 discrepancies. We did not note the other
19 direction where we saw calls detailed on a bill
20 that we did not get DUF records for.

21 MR. CONNOLLY: You mentioned you got
22 DUF records that you didn't expect to receive.

23 MR. HOWARD: Yes, that is correct,
24 in the early phases of the test.

25 MR. WEEKS: For other CLECs.

1 MR. HOWARD: They belonged to other
2 CLECs.

3 MR. CONNOLLY: Did you not see those
4 calls billed?

5 MR. HOWARD: They were not billed to
6 us.

7 MR. WEEKS: They did not appear on
8 the bills.

9 MR. HOWARD: They were simply a
10 discrepancy on the DUF files.

11 MR. WEEKS: It was a marshalling of
12 the DUF issue, not a billing issue.

13 MR. CONNOLLY: So that other CLEC,
14 if it had been watching its bills, it would
15 have received charges to pay for which it did
16 not receive DUFs.

17 MR. HOWARD: I have no idea. Our
18 experience is that we did not see calls on the
19 bills that we did not receive DUF records for.

20 MR. WEEKS: We couldn't comment
21 whether the DUF was sent to both parties or
22 just us. We wouldn't know that.

23 MR. CONNOLLY: So adjustments due to
24 errors, there is none of that that is
25 associated with usage; is that correct?

1 MR. HOWARD: No.

2 MR. WEEKS: No. None of it's
3 associated with --

4 MR. DELLA TORRE: Question 12:
5 When Qwest VI3A result is less than one
6 hundred percent what is the range of billing
7 periods that caused the erroneous billing to
8 occur?

9 The month following the bill period
10 in which the error was made is the earliest
11 possible time the adjustment could be
12 reflected. However the latest adjustment would
13 depend upon the date of the dispute resolution.
14 It could be up to several months.

15 MR. CONNOLLY: Were there any
16 pseudo-CLEC bill adjustments due to error made?

17 MR. DELLA TORRE: Rather than
18 follow the credit and adjustment process as a
19 commercial CLEC we employed the observation and
20 assessment process when we identified errors
21 and therefore we would be unable to comment on
22 the time period required to resolve the
23 disputes, because we used the observations and
24 exceptions which obviously is a very different
25 process.

1 MR. CONNOLLY: Is there a Qwest
2 claims process if you will for a CLEC to use to
3 say these billing elements are wrong?

4 MR. WEEKS: The answer is yes. It
5 was done as a white box test, not as a
6 transaction test.

7 MR. DELLA TORRE: VTC2.

8 MR. CONNOLLY: The pseudo-CLEC and
9 KPMG Consulting didn't use that claims process
10 to register --

11 MR. DELLA TORRE: That's correct.

12 MR. WEEKS: -- correct any
13 discrepancies?

14 MR. DELLA TORRE: That's correct.

15 MR. CONNOLLY: Thanks.

16 MR. DELLA TORRE: Question 13: When
17 Qwest corrected the nonrecurring rates for
18 Oregon and Washington did KPMG review the
19 P-CLEC's true-up to prior incorrectly billed
20 non-recurring charges.

21 The answer is no, for the same
22 reason. We used the observation and exception
23 process.

24 MR. FINNEGAN: Can I ask a
25 follow-up? This is going to be a theme that

1 carries through.

2 On recurring rates on bills for the
3 service-specific items, it appears there were
4 quite a few of them where you weren't getting
5 bills the appropriate amount, you created the
6 exception, Qwest did some things to fix it,
7 among its things, change the rate tables, you
8 found out they weren't billing accurately.

9 As part of the white box test of the
10 wholesale billing process, there was a question
11 raised as to how do you know they are not
12 fixing it just for the pseudo-CLEC and how do
13 you know when they updated the rate tables they
14 didn't just update the pseudo-CLEC rate table,
15 that they indeed went back and fixed all of the
16 CLEC's rate tables?

17 When you are saying these were
18 satisfied, is that the broader scope that Qwest
19 went back and updated all of the CLECs' rate
20 tables or is it within the narrow scope, that
21 as far as the pseudo-CLEC was concerned, the
22 bills were accurate, you have no opinion on
23 whether or not the every other CLEC's bills
24 would be accurate?

25 MR. DELLA TORRE: For the billing

1 test this is as we say, a black box test.

2 Therefore -- the white box test or this test?

3 MR. FINNEGAN: I am talking about
4 both.

5 MR. WEEKS: For the black box test
6 all we did was look at ours. We didn't go to
7 other CLECs --

8 (Simultaneous speaking).

9 MR. FINNEGAN: But in the white box
10 test, if I recall the response, it was you
11 couldn't look inside the white box, so you were
12 looking at the black box results to get some
13 insights as to what their process was.

14 The question at the time was how do
15 you know they are just not doing it for the
16 pseudo-CLEC, how do you know that they are
17 doing it across the board? Does that question
18 still remain, or in the course of your black
19 box and white box test for wholesale billing
20 have you answered that.

21 MR. HOWARD: John, that is Van
22 Howard. I will speak to the usage aspect. As
23 you know in a number of publicly raised
24 exceptions there were a significant number of
25 usage rating problems at Qwest. As part of the

1 resolution of those exceptions, because of the
2 gravity of the problem, we asked to see
3 evidence in the transaction test of improved
4 process for maintaining those rate tables.
5 That was generic. It was not related to just
6 us. And we actually went out and reviewed the
7 improved process and watched that improved
8 process in action.

9 MR. WEEKS: Based on what we saw we
10 have reason to believe that it was fixed across
11 the board, because the process we saw operate
12 wasn't specific to the pseudo-CLEC. We didn't
13 do black box testing of any other CLECs on
14 these issues so we can't confirm to you that
15 what we saw in the white box test that appeared
16 to be working in fact did work with a certainty
17 that we can say it worked for the black box
18 test (inaudible).

19 MR. FINNEGAN: Van commented on the
20 usage aspect. For the wholesale bill, did you
21 want to comment on that?

22 MR. GORALSKI: Yes. This is Joe
23 Goralski. Yes, we did the same thing for the
24 wholesale bill where we looked to their
25 end-to-end contract management process and, in

1 fact, issued an observation on that. And Qwest
2 had put in place more controls over that
3 end-to-end contract process to ensure that the
4 monthly and reoccurring, the issues that we
5 were having all along with the observations and
6 exceptions related to rates, were in fact taken
7 care of in the end-to-end contract process.

8 MR. FINNEGAN: Correct me if my
9 assumption is wrong, but, isn't the wholesale
10 bill table maintenance more CLEC-specific than
11 usage? Than the usage tables?

12 MR. HOWARD: No the usage rate
13 tables are also (inaudible) user specific at
14 Qwest. And we did observe process improvements
15 to both processes based on the severe number of
16 problems that we found.

17 MR. FINNEGAN: So in terms of the
18 relationship between the white box and black
19 box test for wholesale bills, if I understand
20 what you are saying, the criteria in the white
21 box test that was unable to determine until you
22 finished Test 20, those are now satisfied,
23 because you saw them do it for the pseudo-CLEC
24 and you assumed they did the same things for
25 all the other CLECs?

1 MR. WEEKS: We reviewed the process
2 that is done for all CLECs and saw that process
3 operate. We confirmed that in fact the changes
4 that had operated for the pseudo-CLEC worked
5 through the black box test.

6 The piece we haven't done is we
7 haven't gone to a real CLEC in a black box way
8 to confirm that either the DUF or the bill rate
9 changes, the problems we were observing
10 ourselves, got fixed, so to speak, at a real
11 CLEC.

12 So we didn't look at just the
13 process worked just for the pseudo-CLEC, which
14 is I think is what you said. That is
15 inaccurate. We looked at the process work
16 across the board.

17 MR. FINNEGAN: Help me make the
18 distinction then, if I recall some of the
19 responses in the white box test was you
20 couldn't look inside the white box, because it
21 was too much software, it was too much --

22 MR. WEEKS: Those are controls and
23 things that controlled billing aspects, like
24 accuracy of the bill and things like that.

25 With respect to the table

1 maintenance piece we were able to observe it
2 because it's done by human beings, not by
3 software. We did see that operate.

4 MR. FINNEGAN: Okay.

5 Follow-up question. This is a
6 little different approach.

7 For the incorrect recurring charges,
8 and you identify a specific number but you
9 don't identify the percent and it doesn't
10 appear in the exception, either.

11 So for instance, in test
12 cross-reference 20.2.1 now you applied a
13 95 percent standard. We know you identify 33
14 incorrect charges.

15 What we don't know is, 33 out of
16 what?

17 MR. GORALSKI: At the bottom of 2-1
18 we are talking about the whole universe that we
19 looked at. So the 33 instances we found, it
20 was out of that 1335.

21 MR. FINNEGAN: If it was, that is
22 better than the 95 percent, doing the math in
23 my head that's better than the 95 percent. Why
24 would there have been an exception created if
25 the 95 percent standard had been achieved?

1 MR. GORALSKI: At the point in time
2 when we identified this exception we had no
3 idea if they are going to pass or fail that
4 criteria.

5 MR. WEEKS: We did it based upon how
6 many observations we had at that point and
7 additional observations after that.

8 So we didn't complete the test, then
9 calculate the number and say you passed or
10 failed. We had early indications there were
11 problems, so we went ahead and put out the
12 O & E, even though when we finally got to the
13 end of it the math worked out the way it does.

14 MR. DELLA TORRE: As to be expected
15 the problems were front loaded.

16 MR. FINNEGAN: So that number you
17 referenced were throughout the life of the
18 test.

19 MR. WEEKS: Right.

20 MR. GORALSKI: That's correct.

21 MR. FINNEGAN: Would it be safe to
22 assume at some point earlier in the process the
23 33 problems out --

24 MR. WEEKS: Could have been 33 out
25 of 33.

1 MR. DELLA TORRE: It was a
2 higher percent.

3 MR. WEEKS: Very much higher than
4 5 percent.

5 MR. DELLA TORRE: We had a break
6 scheduled for 10:30. We are not going to
7 complete Test 20 in the next two minutes. Why
8 don't we take a break if you will and
9 reconvene --

10 MS. ANDERSON: At 10:45.

11 (Recess.)

12 MR. DELLA TORRE: Let's get started
13 again. We are going to jump back into Test 20
14 with the AT&T questions. I believe we left off
15 with question number 14.

16 But first --

17 MR. CONNOLLY: We are not quite
18 finished with 13.

19 MR. DELLA TORRE: Certainly.
20 Mr. Connelly.

21 MR. CONNOLLY: Thank you. There is
22 a little bit more to our question than got
23 cleared up.

24 We understand that the recurring
25 charges are billed in advance. Is that

1 correct?

2 MR. WEEKS: That's correct.

3 MR. CONNOLLY: So on the May 10th
4 bill, recurring charges are being billed from
5 the 10th of May to the 9th of June.

6 We also understand that with
7 exception 3008, we saw recurring charges being
8 billed in error.

9 MR. GORALSKI: Right.

10 MR. CONNOLLY: So when the update
11 goes through and they change the table entries
12 to have the correct rating, isn't it Qwest's
13 obligation to roll forward an adjustment for
14 all those charges that had been billed in error
15 in the previous month?

16 MS. FUCCILLO: The answer would be
17 had we followed the claims and adjustments
18 process, our expectation would be that we would
19 receive credit or debit, depending on the
20 situation, back to the date of the initiation
21 of the error.

22 So a true-up, in effect, would have
23 occurred.

24 MR. CONNOLLY: Why would you have to
25 request that specific credit?

1 MS. FUCCILLO: You wouldn't. In
2 filing your claim you would state what you
3 believed to be wrong. Qwest would investigate.
4 And if in fact they found that indeed it was
5 wrong, they would go back and adjust that rate
6 back in time accordingly to when the problem
7 began.

8 However, we did not follow that
9 process. So we did not include that in our
10 task. That was out of scope for our task.

11 MR. CONNOLLY: So I want to make
12 sure I get my box colors correct here. The
13 general process improvement, process
14 correction, is the white box, correct?

15 MS. FUCCILLO: That's correct.

16 MR. CONNOLLY: So you saw that Qwest
17 changed, implemented, enhanced its process to
18 set the rates properly from the beginning.

19 Did you see any process at all that
20 shows there is a reaction to rectify previously
21 incorrectly billed rates?

22 MS. FUCCILLO: In Test 20.7 which
23 we -- 24.10, excuse me, we looks at the billing
24 help desk, we looked at the process by which
25 they investigate and resolve disputes.

1 And we confirmed that in fact
2 their -- they are resolved appropriately and
3 back credit is given where appropriate.

4 The table maintenance issue that you
5 are referencing, we did not look at that. We
6 looked at how the contract gets translated to
7 updates to this table. So we didn't look at
8 any retroactive credit or debiting that
9 occurred in that process. Does that answer
10 your question?

11 MR. CONNOLLY: Yes. So I am looking
12 for where did KPMG Consulting observe Qwest
13 taking the appropriate remedial action when it
14 detects a recurring charge error.

15 MS. FUCCILLO: In 24.10 --

16 MR. DELLA TORRE: But not as a
17 transaction test, not as a black box test, we
18 did not.

19 MR. CONNOLLY: I am -- I don't care
20 what color the box is.

21 MR. WEEKS: So in 24.10 we did
22 validate there is a process in place that would
23 retroactively adjust bills for errors of the
24 type that we discussed. We didn't test it.

25 MR. DELLA TORRE: -- and have

1 adjustments made to them.

2 (Simultaneous speaking).

3 MR. CONNOLLY: 24.10 is a white box
4 test. So a CLEC that raised a question about a
5 bill via the help desk and the determination is
6 yes, that's a recurring charge rate that is
7 wrong in the table. What steps does Qwest
8 follow to make that right across the board?

9 MR. DELLA TORRE: We identified that
10 process in 24.10, that was the primary piece of
11 that evaluation, was exactly the steps that
12 they go through.

13 MR. CONNOLLY: And do the steps they
14 take include determining the extent to which
15 previously billed non-recurring charges are
16 billed in error and issuing credits or
17 adjustments to those CLECs whose wholesale
18 bills were incorrectly priced?

19 MR. WEEKS: Yes.

20 MR. CONNOLLY: And so when that
21 process occurred, did that process, that 24.10
22 process, occur in the period of this exception
23 30.08?

24 MR. WEEKS: No, because we didn't go
25 through that process. We didn't do anything to

1 trigger that process.

2 MR. FINNEGAN: Can I ask a
3 follow-up? I was flipping through 24.10.
4 24.10, the evaluation criteria appear to be
5 primarily concerned with when the CLEC
6 initiates an action.

7 In the case we were talking about
8 before, that Qwest had, through the observation
9 and exception process, recognized there were
10 some rates that were incorrect, we assume they
11 went back and fixed it for everybody and not
12 just the pseudo-CLEC. Would they have
13 retroactively trued up the incorrectly billed
14 recurring charges in the absence of a specific
15 CLEC claim?

16 MR. WEEKS: My guess is that this
17 was so out of process, because we were using
18 observations and exceptions to bring this to
19 the company's attention, that we never did
20 trigger the normal billing people and normal
21 billing process.

22 It's our understanding, based on the
23 work that we did, that it would be our
24 expectation that some CLEC would have brought
25 to the company's attention that their bills

1 were incorrect in a specific request and in a
2 specific claim. That would have triggered the
3 investigation. The investigation would have
4 found tables are in error, it's a systemic
5 problem, we need to fix the problem. And that
6 Qwest would, as a result of working through
7 that problem, go back and retroactively make
8 those changes.

9 We didn't go through that process.
10 So I can't give you hard, empirical evidence
11 from the pseudo-CLEC's experience that that is
12 true.

13 MR. FINNEGAN: Would it be fair to
14 say that KPMG did not in the white box test in
15 24.10 review proactive --

16 MR. WEEKS: I am not aware there is
17 a Qwest-initiated change process, is there?

18 MR. WEEKS: It's our understanding
19 that there is such a process to go do the
20 review, detect there is a problem that affects
21 more one CLEC and a process that is in place to
22 actually apply those changes in the way that
23 you are talking about or describing. We didn't
24 see it work, we can't confirm it or that it
25 exists.

1 MR. FINNEGAN: Do you know if it's a
2 going forward or retroactive process or just a
3 going forward process?

4 MR. WEEKS: We don't know.

5 MR. FINNEGAN: Thank you.

6 MR. DELLA TORRE: Question 14:
7 "Please explain whether KPMG tested the same
8 LSRs in its retest activities or whether it was
9 required to issue new LSRs to verify the
10 correct non-recurring UNE charges."

11 New LSRs were sent for the retest
12 activity specifically associated with
13 exceptions 30.79 and 30.88.

14 Question 15: Please provide KPMG's
15 definition/description of billing cycle.

16 I think we have discussed this at
17 length. It's the one-month period from the
18 last bill to the current bill.

19 Okay. This needs to be turned down
20 a little bit.

21 (Pause.)

22 MR. DELLA TORRE: Question 16:
23 Because of the various billing-related
24 Exceptions which identified billing errors on
25 the basis of amounts billed to the P-CLEC, it

1 appears that there were billing errors and
2 consequently the P-CLEC should have been issued
3 adjustments to reflect rates that were
4 incorrectly billed.

5 In which months were billing
6 adjustments made, and when were the results
7 shown in the BI-3A?

8 And this is somewhat similar to what
9 we were discussing before in that this was
10 through the observation and exception process
11 and, therefore, the time line of when the
12 adjustments were made was not the formal and
13 credited adjustment process that is typically
14 followed.

15 And second to that is we did not
16 evaluate the reporting, Qwest reporting of
17 BI-3A.

18 MR. FINNEGAN: I think it's clear
19 you didn't exercise the process of making a
20 claim, but back to our previous series of
21 questions, did you see any evidence that absent
22 a claim, once confronted with the error in the
23 tables, Qwest went back and retroactively
24 corrected it?

25 MR. WEEKS: Answer is no.

1 MR. FINNEGAN: So your evidence
2 would be on these, call them non-CLEC initiated
3 or non-claim-related issues, Qwest is not or
4 did not in this case go back and retroactively
5 adjust the charges?

6 MR. DELLA TORRE: Let me clarify.
7 We did see adjustments made. In fact in some
8 cases we saw that adjustments were
9 intentionally not made, in the case of
10 underbilling conditions where there was a
11 choice by the company not to adjust an
12 underbilling.

13 However it was not part of our
14 evaluation because it wasn't the credit and
15 adjustment process as defined and, therefore,
16 we didn't specifically assess it. We did see
17 adjustments happen and saw decisions for no
18 adjustments take place, but we didn't assess
19 them in any critical manner.

20 MR. FINNEGAN: So you don't know if
21 the adjustments were a result of cleaning up
22 billing tables?

23 MR. DELLA TORRE: They were a result
24 of the observations of exceptions that we
25 raised.

1 MR. WEEKS: They were corrections of
2 errors we brought to Qwest's attention through
3 the observation and exception process.

4 MR. DELLA TORRE: Right.

5 MR. WEEKS: And they were directly
6 related to the charges that were in error that
7 we raised in our exceptions.

8 MR. FINNEGAN: So it sounds like
9 they did go back and make the changes, absent a
10 claim by the pseudo-CLEC.

11 MS. ANDERSON: Nancy, you look like
12 you wanted to say something.

13 MS. LUBAMERSKY: Nancy Lubamersky of
14 Qwest.

15 Perhaps a point of clarification.
16 HPC (inaudible) received the notifications of
17 rate changes made, both as a result of the test
18 and a result of the Qwest-initiated rate
19 validation effort. To Joe's point earlier,
20 many cases retroactive debits were minimal,
21 maybe just a month, but there were, the results
22 in commercial volumes can be viewed September
23 2001 to last month's BI-3A that show yes, we
24 did make the credits retroactive to all CLECs
25 involved on the basis both of the test results

1 and our own rate validation efforts. Again,
2 they received, as a CLEC, notification of those
3 rate changes and credits.

4 MR. DELLA TORRE: We will move
5 forward with the WorldCom questions for
6 Test 20.

7 Question number 1: Clarify how the
8 functionality of the three, regional CRIS
9 systems interrelate for producing UNE, Resale,
10 and UNE-P bills.

11 We discussed this already briefly.
12 They are three separate systems that are
13 functionally equivalent but regional
14 differences indicated.

15 Question number 2: Identify which
16 Qwest documentation KPMG used to gather
17 information related to bill structure, content,
18 and elements. Is the documentation publically
19 available?

20 We used Qwest co-provider billing
21 and usage documentation and that can be found
22 at the Qwest wholesale web site.

23 Question 3: Clarify what specific
24 elements of the customer service records were
25 used along with LSRs, provisioning, completion

1 notice, tariffs and DUF data to develop
2 expected test results.

3 We essentially compared the LSR to
4 the service order completion and then compared
5 the service order completion date to the CSR
6 then the CSR to the bill. So there was a cross
7 validation to each of those.

8 The elements, the primary elements
9 that we evaluated for or checked for were the
10 account number, the service establishment date,
11 the line class code, the seller ID and the
12 various USOCs and FIDs that were associated
13 with the service request.

14 In addition to that on the CSRs were
15 the class of service and the SOC date.

16 Question 4: Specify which billing
17 periods were evaluated, and how were the
18 evaluated billing periods selected over the
19 period of time between May, 2001, and January,
20 2002.

21 The billing periods selected for
22 resale UNE and UNE-P were the first, fourth,
23 fifth and seventh. Dark fiber was the 15th and
24 22nd, and UNIDs (phonetic) were the 19th.

25 We evaluated those bill periods over

1 all the months from May through January.

2 MR. CONNOLLY: Could I ask a
3 clarifying question of HP -- or if you guys
4 know?

5 Did you ask for detailed billing on
6 all of the wholesale bills?

7 MR. DELLA TORRE: Yes. Yes, we did.

8 MR. CONNOLLY: Did you get any
9 summary billing?

10 MR. GORALSKI: Summary billing? It
11 was at the beginning of the bill. The detail
12 followed.

13 MR. CONNOLLY: It's my understanding
14 that you can specify in your CLEC questionnaire
15 whether you want detailed billing or summary
16 billing. A choice.

17 MR. WEEKS: I believe it's the case
18 you ask for detail, you get summary and detail
19 bills together. If you ask for summary you get
20 summary only, I think. That is my
21 recollection. I could be wrong about that.

22 MR. DELLA TORRE: We will revisit
23 that question.

24 MR. CONNOLLY: Okay.

25 MR. DELLA TORRE: We will move

1 forward for now.

2 Question number 5: How many
3 electronic bills and charges were compared with
4 the corresponding paper bill?

5 We had 105 electronic bills that we
6 compared to paper across the regions and there
7 were 420 charges, which is about four per bill
8 and 1,197 subaccount charges.

9 So 105, 420 and 1197.

10 MS. OLIVER: Becky Oliver, WorldCom.
11 This question was also trying to get at were
12 all electronic bills compared with their
13 corresponding paper bill?

14 MR. DELLA TORRE: No, they were not.

15 MS. OLIVER: How was it determined
16 which electronic bills were compared to the
17 corresponding paper bill.

18 MR. DELLA TORRE: The number of 35
19 per region was the target number that was
20 established in a wider audience. The actual
21 selection of those 105 for the entire
22 universe --

23 MR. GORALSKI: That was random
24 number selection we used to select those out of
25 our entire bill universe.

1 MR. DELLA TORRE: Question 6:
2 Clarify if the validation of 192 charges which
3 occurred at the end of the evaluation period
4 was on non-recurring or recurring charges.

5 And this was a typo in the report.
6 It should be non-recurrent. We will correct
7 that for the final.

8 Question 7: From what source(s),
9 during KPMG's evaluation, was the inconsistency
10 in the application of the fractional
11 calculation business rule identified that
12 impacted UNE, Resale and UNE-P bill
13 calculations?

14 And the sources we used to identify
15 the inconsistency were both bills rendered by
16 Qwest in the Central Region as well as the
17 Qwest documentation regarding the calculation
18 to be used when determining fractional charges.
19 And this is also on the Qwest wholesale web
20 site.

21 Yes?

22 MS. OLIVER: Becky Oliver, WorldCom.

23 To clarify the inconsistency that
24 was identified it was discovered by looking at
25 those two sources of documentation.

1 MR. WEEKS: Comparing the bills to
2 what the documentation said should happen.

3 MS. OLIVER: Okay.

4 MR. DELLA TORRE: Question 8: What
5 Qwest retail bill accuracy level was used by
6 KPMG in comparison with wholesale bill
7 completeness?

8 There is a typo in the
9 cross-reference 20-3-1. It should read
10 "Wholesale bill completeness is identified by
11 PID BI-4A is in parity with retail bill
12 completeness."

13 We calculated the average retail
14 results from the period from May, 2001, to
15 January, 2002, and used this as the standard to
16 compare performance. Performance was actually
17 97.5 percent.

18 Other questions on Test 20?

19 MS. OLIVER: Becky Oliver, WorldCom.

20 That clarification will be added
21 into the final?

22 MR. DELLA TORRE: Yes.

23 MS. OLIVER: Okay, great.

24 MR. DELLA TORRE: Okay. If we just
25 take a couple minutes to shift some personnel

1 around, I am suggest we move into Test 14.

2 (Recess.)

3 MR. DELLA TORRE: We will jump into
4 Test 14.

5 MR. PETRI: Don Petri, HP. To your
6 question, for the CRIS wholesale invoice, it's
7 called a CRIS summary bill. However it does
8 contain all of the line level detail. And, to
9 our knowledge, there is no way to request just
10 a summary portion of that in either a paper or
11 electronic format.

12 The P-CLEC did receive -- there is a
13 summary section in the bill as well as all of
14 the detail that is broken out. And that is
15 what we received.

16 MR. CONNOLLY: That was for resale.

17 MR. PETRI: That was for resale and
18 for -- well, our wholesale bills. We only
19 received CRIS, we did not receive IFs. We
20 received CRIS invoicing and we received BART
21 invoicing. Those are the only two billing
22 components that we received.

23 MR. CONNOLLY: There's a wholesale
24 bill for resale services.

25 MR. PETRI: Correct.

1 MR. CONNOLLY: Wholesale bill for
2 UNE-P?

3 MR. PETRI: Correct.

4 MR, CONNOLLY: And UNE loop?

5 MR. PETRI: Correct, all the
6 wholesale bills we received through CRIS 811,
7 there is not the ability to request just a
8 summary portion only. It contains a summary as
9 well as the line level detail: We can only
10 speak to the CRIS and BART bills we received
11 for the dart fiber.

12 MR. CONNOLLY: Can you describe
13 differences, if any, on the resale bills and
14 the UNE-P bills for the presentation or billing
15 usage terms?

16 MR. PETRI: We would have to defer
17 that to KPMG. We did not look at the bills
18 themselves. We received them electronically.
19 We did the EDI translation but did not do any
20 evaluation of the bills. So, Joe, I don't know
21 if you guys --

22 MR. DELLA TORRE: I apologize, I
23 wasn't tracking.

24 MR. CONNOLLY: The question is what
25 differences are there if any between the resale

1 bills and UNE-P bills --

2 (Pause.)

3 MR. CONNOLLY: So the question is,
4 the differences if any between the resale
5 wholesale bills and the UNE-P wholesale bills
6 relative to the presentation of the usage
7 charges and records.

8 MS. FUCCILLO: I can answer that.

9 MR. DELLA TORRE: Give the mic over
10 to Liz.

11 MS. FUCCILLO: The is Liz Fuccillo
12 of KPMG. Resale bills, the call detail is on a
13 per-call basis and identified as such, very
14 similar to a retail bill.

15 For UNE-P the charges are aggregated
16 on minutes of use. And so there is a
17 difference between them in that regard.

18 MR. CONNOLLY: So when you are
19 evaluating the -- so a CLEC would be able to
20 look at a resale bill and track calls made,
21 through the DUF onto the bill, on a call by
22 call basis?

23 MS. FUCCILLO: Yes.

24 MR. CONNOLLY: But on a UNE-P bill
25 it would not be able to do that; is that

1 correct.

2 MS. FUCCILLO: Well, yes, you could
3 do it if we did it. And what you would have to
4 do is add up the minutes of use, apply the
5 business rules and compare it to your bill.

6 MR. CONNOLLY: So you couldn't take
7 a record of a call like you guys did, find a
8 DUF and then find that call detail record on
9 the UNE-P bill?

10 MS. FUCCILLO: No, you could not.

11 MR. WEEKS: That is correct.

12 MS. FUCCILLO: (Inaduable.)

13 MR. CONNOLLY: Was that a product of
14 your bill request to Qwest? Did you ask to be
15 billed that way for those UNE-P calls?

16 Ms, FUCCILLO: No, we made no
17 special request.

18 MR. CONNOLLY: Do you know if you
19 can get the detailed bill of the UNE-P calls
20 like you can the resale call detail?

21 MS. FUCCILLO: I am not aware that
22 you can make such a request.

23 MR. CONNOLLY: Okay.

24 MR. WEEKS: Would Qwest like to
25 comment on that?

1 MR. VIVEROS: This is Chris Viveros.
2 Just making sure that I understand, this is the
3 discussion we had in another state, correct?
4 And I think we answered it there that in fact
5 that is not an option, that the structure,
6 rating structure for UNE-P as Liz indicated is
7 minute-of-use based, so that is not a billing
8 option available for those local calls.

9 MS. FUCCILLO: That's correct.

10 MR. CONNOLLY: Do you know, Chris,
11 if there is a charge per DUF record produced
12 that is billed to the CLEC?

13 MR. VIVEROS: My understanding is
14 that we do not charge for DUF.

15 MR. CONNOLLY: And no charge for
16 file, for providing DUF?

17 MR. VIVEROS: For providing DUF
18 records, currently there is no charge.

19 MR. WEEKS: That is our
20 understanding as well.

21 MR. CONNOLLY: Thanks.

22 MR. DELLA TORRE: We will move on to
23 Test 14. And I will begin with the Montana
24 state questions.

25 The first question was actually an

1 identification of a typographical error in the
2 report which will be corrected in the next
3 release, in the final report, rather.

4 Question number 2 was a request for
5 information regarding the specific CLECs that
6 participated in the test. And that is a matter
7 of confidential information and we would be
8 happy to provide that information to Montana
9 state specifically, off line.

10 MS. WHITNEY: Please do.

11 MR. DELLA TORRE: And question
12 number 3. Table 14-5 which are the results
13 tables. There are several unable to
14 determine.

15 Please identify which, if any, of
16 these items will be revised, indicate whether
17 satisfied or not satisfied in the final report.

18 We cannot determine conclusively at
19 this moment, as the retest is still under way.
20 However, the likely results should the current
21 retest prove satisfactory, are already
22 indicated in the report.

23 We do provide, in the comments
24 language, for each of the unable to determine
25 criteria whether or not the performance

1 evaluation was a passing performance or failing
2 performance.

3 But then, subsequent to being able
4 to draw that conclusion, we were unable to
5 determine, based on the underlying data
6 integrity. So we do indicate that it looked
7 like this would have passed had this other
8 issue not come up or it looks like this would
9 have failed had this other issue not come up.
10 So that is contained in the report and I
11 believe it's also in Section 5.

12 MS. WHITNEY: Kate Whitney, Montana
13 state.

14 Many of those unable to determines
15 seem to be as a result of Liberty Consulting
16 not having completed something for OP3. When
17 that is completed won't you be able to then say
18 satisfied or not satisfied?

19 MR. WEEKS: I think what we are
20 trying to say is, the reason we threw those
21 into unable wasn't because of the score, so to
22 speak, that Qwest got in its performance part
23 of the evaluation, those numbers are already
24 there and you can sort of see by looking at
25 them whether they are going to be sat or not

1 sat. We just threw this into an unable state
2 because of the data integrity issue that we are
3 investigating and Liberty is investigating with
4 us in that investigation. That is what we are
5 referring to at the bottom.

6 MS. WHITNEY: Thank you.

7 MR. DELLA TORRE: There are actually
8 two issues involved, both the Liberty
9 assessment of the retail portion of the parity
10 number and then also our retest which Liberty
11 is participating in as well of the wholesale
12 data calculations.

13 Okay. So why don't we jump to the
14 WorldCom section for Test 14. Actually,
15 Washington state.

16 MR. WEEKS: I think this gets to the
17 Washington state questions in terms of are
18 there state-specific results? The answer is
19 no, but there are region-specific results in
20 many of these evaluation criteria.

21 If you look in the comments you will
22 see, in the Eastern Region so and so, the
23 Central Region so and so, Western Region so and
24 so. So there is absolutely region-specific
25 information for a number of these evaluation

1 criteria, but not state-specific tables that
2 are in there.

3 There are currently no open
4 observations and exceptions in this area. We
5 sent the last closure if you will disposition
6 on 354, is -- should be -- it went out Friday.
7 So I think that was the last dangling
8 participle here. So that is taken care of.

9 I will also bring your attention to
10 the fact that in a couple cases the
11 non-satisfieds and unables aren't related to
12 the issue we were discussing earlier. They
13 were, in fact, related to, in many cases, a
14 lack of commercial volume and records for us to
15 examine, (inaudible) dark fiber, that sort of
16 thing, where there just wasn't enough ongoing
17 commercial activity for us to build a large
18 enough sample size to offer an opinion on.

19 That is clearly set out in the
20 report and in those cases what you see is what
21 you get. We won't be changing the report for
22 those.

23 Does that cover all of your
24 questions?

25 MR. DELLA TORRE: Okay. WorldCom.

1 For convenience sake, if there are any mikes
2 back there send them up this way.

3 Question 1: Once a DSR, switch
4 translation request or disconnect request is
5 entered into SOP is a FOC returned to the CLEC.

6 Answer, yes.

7 Question 2. For what type of CLEC
8 request is a FOC not provided.

9 For all of the test scenarios that
10 we ran we did receive a FOC except for
11 condition of cancels where we didn't expect
12 FOCs to be generated. So we would not be able
13 to say under what conditions the SOC might not
14 come back. So we received them every time we
15 expected.

16 MS. OLIVER: Becky Oliver. This is
17 actually asking about a work completion
18 notification, you are saying that is a SOC.
19 This is --

20 MR. DELLA TORRE: We created an
21 unnecessary amount of confusion. We are going
22 through the report to revise our use of the
23 language around completion notices. We will be
24 much, much more particular about our selection
25 of acronyms and language.

1 The vast majority of our analysis
2 and assessment are around service order
3 completions, SOCs, not WCNs or PBNs or VCNs or
4 any of those.

5 We are actually revising wholesale
6 revisions to make sure those acronyms are used
7 appropriately throughout Test 12, Test 14 and
8 other cases where we have noted today.

9 MS. OLIVER: Becky Oliver. The
10 question was related to the sentence in the
11 draft report which reads: Examples of service
12 requests that generated WCN include, et cetera.
13 So those were just a representative example --

14 MR. WEEKS: Of SOCs.

15 MR. DELLA TORRE: Question 3. Is an
16 updated CSR created when provisioning completes
17 for CLECs' Facility-Based requests?

18 The answer is yes.

19 Is an updated CSR (created and
20 stored in OSS/BSS) retrievable by CLECs?

21 The answer is yes, via the GUI.

22 Question 5: Specify if Table 14-3
23 should be titled "UNE-P Test Scenarios"?

24 The answer is yes. We will make the
25 correction.

1 Question 6. In what region(s) of
2 Qwest's territory did KPMG make its
3 observations of installation activities (at
4 Qwest CO and customer prem locations?

5 We did make the observations in all
6 three regions, Eastern, Western and Central.

7 Question 7: From what source or
8 sources did KPMG obtain the pre-activity and
9 post-activity CSRs?

10 We received CSRs prior to the
11 initiation of test activities directly from
12 Qwest through a special feed that was set up
13 specifically for the test.

14 As for post-activity CSRs we used
15 both that feed and CSR preorder queries, as
16 well.

17 MS. OLIVER: Becky Oliver, WorldCom.
18 Why would both sources have been used for
19 post-activity CSRs?

20 MR. DELLA TORRE: For new accounts
21 there is a condition. There were certain
22 conditions under which we would automatically
23 receive the CSR through the automated feed that
24 was set up.

25 In other conditions that CSR was not

1 generated through that special feed and,
2 therefore, we went and pulled CSRs ourselves
3 using the preorder query.

4 And I believe the differentiation
5 was between new accounts --

6 MR. FALCONE: Bob Falcone, KPMG
7 Consulting. If Qwest was aware of the account,
8 it was an original test bed account, and there
9 was some activity on that account, Qwest was
10 aware there was some activity on that account,
11 therefore they would auto-push the new CSR
12 through this feed.

13 However, during the course of the
14 test we also established new accounts, new TNs,
15 new lines. Qwest wasn't aware of those, it
16 wasn't in their test bed matrix. When those
17 accounts were established there was no
18 auto-push of those CSRs and we had to go pull
19 them down ourselves off the GUI. .

20 MS. OLIVER: Thank you. I had a
21 follow-up on question 6. The answer was the
22 observations were made in all three Eastern,
23 Western and Central regions.

24 Were the observations made
25 approximately evenly across those regions or

1 were most of the activity taking place in on or
2 two of them?

3 MR. BUJAN: Michael Bujan,
4 B-U-J-A-N, KPMG Consulting. We had statistical
5 sample sizes that we were working to attain in
6 each of the regions. So, depending on the test
7 activity type we would go out into the field to
8 attain those results and, in fact, it was
9 spread out throughout the regions. So we
10 visited --

11 We -- in the region there were
12 either test bed orders or commercial
13 opportunities available.

14 MS. OLIVER: So the answer would be
15 I would need to go look at what the statistical
16 samplings --

17 MR. DELLA TORRE: It was spread out
18 evenly between the three regions.

19 MS. OLIVER: Okay, thanks.

20 MR. DELLA TORRE: Question 8: When
21 did KPMG Consulting conduct its manual testing
22 for the sampled disconnect request to verify
23 that they were accurately completed?

24 We did that testing between April of
25 2001 and January of 2002.

1 MS. OLIVER: Becky Oliver, WorldCom.
2 This question I probably didn't do a good job
3 of phrasing it. I actually was wanting to get
4 an understanding of the sample disconnect
5 requests that were verified. When did that
6 verification happen relative to the order
7 itself, so it completed on X date and then at
8 what point after completion was the manual
9 testing done to verify it.

10 MR. BUJAN: Michael Bujan, KPMG
11 Consulting again. These orders were reviewed,
12 the list we were to look at were reviewed
13 daily. As soon as we got SOC on the particular
14 order we went in and we did the test. So it
15 was immediately after receiving the service
16 order completion notice.

17 MS. OLIVER: Follow up. That the
18 PCI having received the SOC?

19 MR. BUJAN: That's correct.

20 MS. OLIVER: And they informed you
21 or you were there monitoring to see when the
22 P-CLEC received it?

23 MR. DELLA TORRE: We have a daily
24 feed, the time delay between the two of us was
25 very small.

1 MS. OLIVER: Thanks.

2 MR. DELLA TORRE: Question 9: Per
3 KPMG Test 14, Section 1, "Description", Test 14
4 involved verifying that submitted P-CLEC orders
5 were provisioned as requested on the LSR. Thus
6 what evidence or data did KPMG Consulting
7 gather to validate that the P-CLEC High
8 Capacity Circuit requests were accurately
9 provisioned.

10 And the High Capacity was a review
11 of the P-CLEC orders and actual observations at
12 the Qwest network operating center.

13 Question 10 --

14 MS. OLIVER: Becky Oliver, WorldCom.
15 Follow up on question 9. Are there any more
16 specifics around these observations at the
17 Qwest network --

18 MR. WEEKS: We watched the actual
19 tech go through the process, watched them
20 execute their MMPs.

21 MS. OLIVER: So the validation was
22 driven based on the MMP rather than maybe some
23 kind of test just to see that the circuit was
24 turned up live correctly and in the correct
25 spot for the correct customer as specified on

1 the order? That is kind of what this question
2 and through I think question 16 is getting at.

3 MR. DELLA TORRE: It was a
4 comparison of, we knew what the order was, we
5 knew what we were requesting and then we
6 watched the techs actually adhere to the MMPs
7 to turn up the order that was requested. So we
8 had sort of the advance knowledge of the order,
9 and then the ability to be in the NOC seeing
10 the folks go through the appropriate steps.
11 And identified whether or not and I believe we
12 raised an observation or exception in this
13 arena on adherence and following, doing all the
14 appropriate test steps in turning up an ICAP
15 circuit.

16 MR. WEEKS: I think the result is we
17 did what you said. The way we did it was by
18 noting the contents of the order and contents
19 of the process, taken care, produce the desired
20 result.

21 MR. DELLA TORRE: There is a similar
22 format to the next question but the object are
23 stand alone LMP requests. And in this case we
24 used the cooperation of actual CLECs and our
25 testers were located in the Qwest NORSIMAX

1 (phonetic) center and also the CLEC's NOC and
2 we went through the same process we described a
3 moment ago.

4 In addition the impact subscription
5 record was reviewed at the CLEC's NOC.

6 Question 11: Similar. LNP Hot Cuts
7 in this case. Similar answer in that we used
8 the cooperation of actual CLECs in this case.
9 Located in both the Qwest CO and partnering
10 CLEC's NOC. We also evaluated the impact
11 subscription record.

12 Question 12: The, same question,
13 object EEL requests. In this case it was test
14 bed orders rather than commercial activity. We
15 were at a variety of Qwest network operation
16 centers and again we observed adherence to the
17 MMPs and proper testing that the provisioning
18 occurred aspects.

19 Question 13: Similar question. The
20 object being working line service requests.
21 Here we used commercial working lines. We
22 reviewed live commercial working lines.

23 And our testers were located at the
24 partnering CLEC's test and turn up centers and
25 we witnessed the partnering CLECs accept the

1 circuits from Qwest.

2 Question 14: Similar question.

3 With xDSL requests. In this case we reviewed
4 all the live commercial xDSL installations that
5 were available.

6 Question 15 is the aDSL line sharing
7 requests. And these were both test bed orders
8 and live commercial installations at several
9 Qwest COs.

10 Question 15 --

11 MS. OLIVER: Becky Oliver, WorldCom.
12 I have a question back on 14.

13 I think I understood the response to
14 be that KPMG observed all commercial lines that
15 were available?

16 MR. DELLA TORRE: Commercial xDSL
17 installations.

18 MR. WEEKS: New installs that were
19 going on at the time.

20 MS. OLIVER: Thank you.

21 MR. DELLA TORRE: 16, I believe?

22 (Reporter requests clarification.)

23 MR. DELLA TORRE: Question 16: The
24 object of the question are analog loop
25 requests.

1 And these were test bed orders.

2 Again, we were at several Qwest COs.

3 Finally, question 17, the object is
4 dark fiber.

5 And here we attempted -- we did
6 review all the live commercial dark fiber
7 installations.

8 Question 18: At what point
9 following the service order completion of the
10 sampled LSRs was the comparison to the
11 directory assistance database made?

12 And we actually had a tester
13 stationed in the Qwest directory center in
14 Arizona and pulled the listings the day after
15 the SOC.

16 Question 19: At what point
17 following the SOC of the sampled LSRs was
18 switch translation conducted.

19 The switch translations were
20 requested following the service order
21 completion in the data request. It was a
22 mechanism used in the test and we submitted our
23 data requests anywhere from five to ten days
24 after completion of the order.

25 All right.

1 MS. OLIVER: Becky Oliver, WorldCom.
2 Was that just random, when you said
3 submitted your requests anywhere from five to
4 ten days after --

5 MR. WEEKS: We would accumulate them
6 for a period of time --

7 MR. DELLA TORRE: It was a batch
8 effort.

9 MR. WEEKS: -- several days or
10 week's worth.

11 MS. OLIVER: Was there a reason the
12 switch validation didn't happen similar to the
13 other validation questions that you have
14 answered about how it happened the day
15 following the SOC?

16 MR. WEEKS: I think the most correct
17 answer is it's just momentum. That is the way
18 we did it in other tests. There is not a
19 fundamental reason why there is a difference
20 (inaudible).

21 MR. DELLA TORRE: Question 20: Did
22 KPMG oversee the generation of the switch
23 translation screen printouts by Qwest?

24 The answer is no.

25 Question 21: Did KPMG Consulting

1 validate the date provided on the WCN was the
2 actual date of the service completion?

3 The answer is no.

4 Question 22: How did KPMG
5 Consulting determine the CSR was updated on the
6 commitment date provided on the FOC.

7 We used the SOC date and the date
8 the CSR or rather the date the CSR was updated
9 to verify whether the CSR was updated in a
10 timely manner. And we were looking for a three
11 to five-day, business day, window that we would
12 go validated that the CSR was updated as
13 compared to the date on the SOC.

14 MS. OLIVER: I am sorry. Can you
15 please repeat that? I did not follow it.

16 MR. DELLA TORRE: Sure. We looked
17 for the SOC to have been updated in a window of
18 time three to five days, the CSR, my apologies.
19 We looked for the CSR to have been updated
20 three to five days after the SOC date.

21 So FOC due date, three to five days
22 later CSR is updated.

23 MS. OLIVER: SOC due date.

24 MR. DELLA TORRE: I keep saying the
25 same thing. I apologize.

1 MS. OLIVER: And was that three to
2 five days after SOC for the CSR to be updated,
3 is that --

4 MR. WEEKS: That's Qwest's policy.

5 MS. OLIVER: Per Qwest business
6 rules and so forth?

7 MR. WEEKS: Right.

8 MR. DELLA TORRE: Question 23:
9 Specify which Qwest records were used by KPMG
10 to validate that the number was ported on the
11 due date and are those Qwest records regularly
12 produced or were they made available
13 specifically for KPMG's use.

14 We utilized the screen printouts
15 from the translation screen records which are
16 regularly produced to verify the number has
17 been staged for porting and that the 10-digit
18 trigger is in place. Then subsequently, to
19 verify the numbers were actually ported on the
20 due date we had team members present at the
21 P-CLEC NOC to observe the activation of these
22 numbers on the due date. The P-CLEC NOC
23 printed out screen prints to indicate that the
24 order had been completed successfully.

25 My apologies. That shouldn't be

1 P-CLEC. It's actually participating or
2 commercial CLECs.

3 Question 24: Did KPMG's evaluation
4 of provisioning for stand alone LNP include the
5 processing of number changes to NPAC?

6 The answer is yes.

7 And question 25: Did KPMG's
8 evaluation of provisioning for stand alone LNP
9 include the processing of directory listings?

10 The answer is no. There were no
11 requirements for DL changes on standalone
12 LNP-type orders.

13 We will move forward with the AT&T
14 questions.

15 Please confirm that the term service
16 order means those orders generated from CLEC
17 submitted LSRs and NSRs and those entered by
18 Qwest retail representatives in the Qwest
19 system.

20 The answer is yes. We added to a
21 great deal of confusion with a loose
22 application of the acronyms.

23 Please confirm that the software
24 changes are those made to Qwest's switches and
25 adjunct devices including control point

1 databases.

2 And our answer is yes, but we did
3 not evaluate adjunct devices except for LSS.

4 Would you want to provide any
5 additional clarification on what you meant by
6 adjunct devices, because maybe we weren't
7 interpreting it correctly.

8 MR. CONNOLLY: Well, what we were
9 concerned about were changes to functions like
10 LIDB, L-I-D-B, functions in which the
11 information that controls certain calling
12 routines are stored in control processors and
13 so forth which are adjuncts to the switch.

14 MR. WEEKS: We didn't track it to
15 the LIDB and other things like that.

16 MR. DELLA TORRE: Question 2:
17 Please confirm that the KPMG Consulting
18 examination of work completion notices did not
19 include an examination of billing completion
20 notices.

21 And that is correct.

22 Question 3: Please confirm that the
23 KPMG Consulting examination of Hot Cuts with
24 local number portability included coordinated
25 and non-coordinated cuts.

1 The answer is yes, that is true.

2 Question 4: Please confirm that the
3 KPMG Consulting examination in Test 14 included
4 LSR supplements.

5 It did include LSR supplements. The
6 answer is yes.

7 Question 5: Please confirm that the
8 KPMG Consulting examination in Test 14 included
9 provider initiated transactions provided to
10 CLECs by Qwest via EDI.

11 And the answer is yes.

12 Question 6: Please confirm that a
13 Qwest FOC provides the CLEC with the numbers of
14 all service orders that are generated from the
15 CLEC LSR, in the cases where multiple service
16 orders are required to fulfill a CLEC LSR.

17 And we are actually not prepared to
18 answer that. We would request if Qwest has
19 more information on that. We did not evaluate
20 whether or not all the service order numbers
21 are provided on a Qwest FOC.

22 MR. VIVEROS: Yes, when an LSR comes
23 in and that results in multiple service orders
24 being generated, each of those service orders
25 is defined on the FOC. So in case where just

1 one FOC there is a one-to-many relationship,
2 each reference number reflects the unique order
3 generated as a result of that LSR.

4 MR. DELLA TORRE: Thank you.

5 MR. CONNOLLY: I have follow-up for
6 whoever will take this question.

7 Once an order has been confirmed, as
8 Chris says the service order string is laid out
9 in the confirmation, provider initiated
10 transactions to change the service order
11 number, did KPMG Consulting evaluate those
12 transactions?

13 MR. VIVEROS: I'm sorry, would you
14 say that again?

15 MR. CONNOLLY: Once an order is
16 confirmed with the various service order
17 numbers in it, if for some reason Qwest has to
18 change a service order number, would they first
19 of all communicate that through a provider
20 initiated transaction?

21 Secondly if that was the case,
22 secondly, did KPMG Consulting evaluate that.

23 MR. DELLA TORRE: We did not either
24 way. Regardless of whether they do or don't we
25 didn't assess that.

1 MR. CONNOLLY: Does Qwest change the
2 service order numbers and notify through PATs?

3 MR. VIVEROS: There are occasions we
4 have a need to change a service order and we do
5 communicate those through a reissuance of the
6 FOC.

7 I am struggling a bit of your
8 terminology of PATs. To me it would be an
9 unsolicited -- in an EDI world, it would be an
10 unsolicited 865.

11 MR. CONNOLLY: It wouldn't be a FOC
12 in the original sense of a purchase order
13 number being confirmed, it would be a
14 supplemental unsolicited 865 if the (inaudible)
15 and the order number changed.

16 MR. VIVEROS: That's correct.

17 MR. CONNOLLY: Perfect.

18 MR. DELLA TORRE: Question 7: KPMG
19 Consulting states: Upon receipt of the forms,
20 Qwest enters the request into the SOP either
21 manually or electronically. SOP routes the
22 directory information to the Qwest translator
23 gateway. What is the name of this gateway?

24 The listing service system LSS.

25 Question 8: What is the process

1 that is used to obtain corrections for
2 directory assistance database errors and
3 rejects?

4 And we would like to defer this
5 question to HPC.

6 MR. WEEKS: Same answer. I don't
7 think we know how this happens.

8 (Pause.)

9 MR. DELLA TORRE: Let's go back to
10 question 8. It appears we will be unable to
11 answer question 8 today. We will decide before
12 the end of the week. We may be able to revisit
13 it tomorrow or Thursday. If not, it's
14 certainly, at a minimum by Thursday, we will
15 come up with some mechanism by which we can
16 convey answers to follow-ups or situations like
17 this where we are unable to answer a question
18 here, because we don't expect to have any other
19 forums of this type.

20 So, by Thursday, the vendors will
21 get together and discuss what would be an
22 appropriate mechanism, it's likely going to be
23 an e-mail to this same audience.

24 For this question number 8 and any
25 other follow-up questions that are take-aways

1 from the next three days. We will try to get
2 back to this later in the week.

3 Let's move to question number 9:

4 KPMG Consulting report states in
5 general the switch translation process is
6 automated for service and feature type orders.
7 In some cases the central office technician
8 must manually complete some of the steps to
9 provision orders that are more complex.

10 The question is the complexity point
11 at which the COT must manually complete
12 provisioning on some orders, a documented point
13 of complexity.

14 The second question, is the
15 complexity point also reached because of the
16 volume of ordered products and services?

17 Our response to the first is we are
18 not aware of any documentation that exists to
19 explain why certain orders drop from manual
20 handling.

21 We are not, we do not have any
22 evidence and would not speculate on whether or
23 not -- why these orders would drop as related
24 to the volume.

25 MR. CONNOLLY: We weren't asking

1 about order volume in terms of the number of
2 orders. We were talking about the volume of
3 changes within an order that need to be made.

4 Question 10. Which types of CLEC
5 service requests do not generate work
6 completion notices, also known as SOCs?

7 And all of our test scenarios
8 reviewed in Test 14 did in fact receive SOCs.

9 Question 11. KPMG Consulting
10 indicates the CSR validation involved customer
11 information. What meaning has KPMG Consulting
12 attached to the customer for this validation?

13 And in this case it's the CLEC's
14 end-user.

15 Question 12 --

16 MR. CONNOLLY: Excuse me, Joe. How
17 about the CSR validation for UNE loop
18 provisioned orders?

19 MR. DELLA TORRE: For that it's
20 rolled up for the entire CLEC at the account
21 level, but you could identify on that, on the
22 CLEC's account level CSR, specific loop level
23 information.

24 MR. CONNOLLY: In circuit number, TN
25 sort of format contrasted with for UNE-P or

1 resale?

2 MR. DELLA TORRE: Individual CSRs.

3 MR. CONNOLLY: There would be
4 individual CSRs. What other products get
5 rolled up into the CLEC specific CSR?

6 MR. DELLA TORRE: I am sorry?

7 MR. CONNOLLY: UNE-P and resale we
8 see a separate stand alone CSR.

9 MR. DELLA TORRE: Right.

10 MR. CONNOLLY: All others are rolled
11 up to a CLEC CSR?

12 MR. DELLA TORRE: Yes. From loop.
13 For loop -- UNE loop --

14 MR. FALCONE: Bob Falcone, KPMG
15 Consulting. For UNE products they are not at
16 an individual end user level. When we talk
17 resale, things like private line, and it's not
18 just resale products, there are individual CSRs
19 for private lines, Centrex, and those products
20 have individual end-user, if you will, CSRs but
21 UNE products are rolled up, if you will, at the
22 CLEC level.

23 MR. CONNOLLY: When we look at your
24 description of, the business process
25 description involving CSR validation, it is all

1 of the various types of CSRs, standalone and
2 user specific, CLEC aggregated CSRs?

3 MR. FALCONE: Yes.

4 MR. CONNOLLY: Customer means more
5 than one thing in that description?

6 MR. DELLA TORRE: You are right. We
7 will enhance the language or refine the
8 language in there to distinguish between an
9 end-user customer and the specific facilities
10 or UNEs that are broken out and, therefore,
11 only captured on the one CLEC CSR.

12 MS. ANDERSON: Joe, would now be a
13 good time for our lunch break? I think we are
14 not going to finish this set of questions in
15 the very short-term. We might as well break
16 for lunch.

17 MR. DELLA TORRE: Sure.

18 MS. ANDERSON: Before we do that,
19 just a couple things for folks who may not be
20 familiar with the area.

21 (Discussion off the record.)

22 MS. ANDERSON: We will reconvene at
23 exactly 1:15.

24 (Recessed at 12 o'clock noon to
25 reconvene at 1:15 p.m.)

1 MS. ANDERSON: Okay, folks, we're
2 going to begin again continuing with Test 14.
3 Folks, on the bridge we're just reconvening
4 here. The fearless leader of the KPMG team is
5 regaining his seat.

6 MR. DELLA TORRE: All right. At
7 this, folks, we're about to get started.

8 MR. WEEKS: This is Mike Weeks. The
9 first thing I would like to do is revisit Test
10 14, question 8. The question was "What is the
11 process that is used to obtain corrections for
12 direct assistance database errors and rejects?"

13 It was KPMG Consulting's intentions
14 that we would have asked HPC to talk about
15 this. We thought we did. In checking we never
16 forwarded this question to them so we had
17 intended to do that but did not, so their blank
18 stares can be explained by our mistake.

19 And in talking at the break, the
20 correct answer to the question is we don't
21 know. We did not during the course of this
22 test attempt to fix directory assistance
23 database errors or rejects, nor did in talking
24 with HPC did they have an occasion to do this.
25 So as a formal matter, neither of us is aware

1 of what process Qwest has, if any, to make
2 corrections that might occur there.

3 Qwest, do you want to make a comment
4 on what the process is to do that?

5 MS. NOTARIANNI: No.

6 MR. WEEKS: Okay. We'll reask it
7 when we are joined by others; is that the
8 request?

9 MR. SIMANSON: This is Scott
10 Simanson with Qwest. I don't have all the
11 details so we'll probably have to dig a little
12 bit deeper, Mike and Tim, but halfway through
13 the process, we implemented an automated e-mail
14 back to the CLEC when there was an error. So
15 when they had a database error it automatically
16 sent an e-mail back to them to tell them what
17 they needed to fix when it bounced off of our
18 database.

19 That's about all I can really tell
20 you, so I know we addressed the issue about
21 halfway through the test. I don't remember the
22 details around all of that, so we'll have to
23 probably dig a little deeper on our side as
24 well.

25 MR. WEEKS: Okay.

1 MR. DELLA TORRE: Okay. I would
2 also like to revisit a question, it was the one
3 just prior to breaking, which is question
4 number 11 of Test 14, AT&T question number 11,
5 and I just want to make sure we were clear on
6 the various types of CSRs and the various types
7 of CSR queries, the information one can get.
8 It is a correct statement that for resale and
9 UNE-P you can get an individual end-user
10 customer CSR. In that case the notion of
11 customer information refers to the end user
12 that's for resale and UNE-P.

13 It's also correct to say that for
14 loops, there is, if you will, an aggregated CSR
15 where the customer is actually the CLEC not the
16 end user. And that would be pulled off the
17 BAN, or the billing account number, where there
18 are multiple information segments contained on
19 that one CSR.

20 However, there is also the
21 opportunity to do a query by SBN, or special
22 billing number, which will relate to an
23 individual loop so you do not have to pull the
24 entire CLEC BAN into a related CSR; you can use
25 the SBN to query CSR for an individual piece of

1 loop information. So in that sense it is still
2 not a direct correlation to an end-user
3 customer because an end user may have several
4 SBNs.

5 So technically, customer information
6 for all of the loop-type CSR queries is the
7 CLEC type of a customer, not the end user.

8 Okay. So we left off at question
9 number 12.

10 "Is 'customer information change
11 request' an LSR when issued by a CLEC?"

12 The answer is yes.

13 And is it a service order when
14 issued by Qwest?

15 And we would actually defer that
16 question to Qwest as to what they would
17 internally reference a customer information
18 change request.

19 MS. HUFF: This is Loretta Huff from
20 Qwest. When an LSR is received --

21 MR. DELLA TORRE: Two things, I'm
22 sorry, Loretta. First, you need to use the
23 microphone when folks are speaking to people on
24 the bridge and second, if everyone could start
25 off with their name. Thank you.

1 MS. HUFF: This is Loretta Huff from
2 Qwest. When an LSR is received from a CLEC the
3 process we go through is to transform that into
4 internal Qwest service orders. So that is the
5 appropriate terminology. Does that address
6 your question?

7 MR. CONNOLLY: The question evolves
8 from this terminology, customer information
9 change request; that is somewhat arcane for
10 whatever is meant by that. And I was trying to
11 divine what you mean by a customer information
12 change request, which is the introductory words
13 in that second paragraph under CSR Validation
14 of the report.

15 MR. WEEKS: Let me read the
16 paragraph Tim is referring to. It's in section
17 2.1 under the sub heading CSR Validation. The
18 second paragraph reads: The customer
19 information change request begins when a CLEC
20 submits an LSR form to migrate, install,
21 convert, change, or disconnect features and
22 services to Qwest via one of the IMA electronic
23 interfaces or manually via fax, which is
24 received by IISS.

25 MR. DELLA TORRE: In that case the

1 customer is the end user. The CLEC is going to
2 be submitting an LSR based on needs or a
3 request or an inquiry based on their end user.

4 So there by saying the customer
5 information change request could just as easily
6 be the LSR, that process starts when the CLEC
7 submits the LSR to perform a function for an
8 end customer to migrate that person's account,
9 to install new lines, to change the account, et
10 cetera.

11 MR. CONNOLLY: By customer
12 information change request, you don't mean
13 anything other than an LSR?

14 MR. DELLA TORRE: That's correct.

15 MR. WEEKS: It's not a form; it is a
16 process.

17 MR. DELLA TORRE: That's correct.

18 Okay. Question 13. There is a
19 quote from the report "'Working line validation
20 is a variation of the installation procedures
21 for all resale and UNE-P services that may
22 include a coordinated installation. A
23 coordinated installation requires the
24 dispatching of Qwest staff to CLEC and customer
25 locations.'"

1 The question then is "In what types
2 of circumstances would dispatch be required to
3 CLEC locations for any resale of UNE-P
4 requests."

5 While we don't know what the
6 universe of possibilities are, cases that we
7 have seen are situations such as news or adds
8 where there was no dedicated outside plan, the
9 CLEC customer, if there is an add to that line,
10 to that account.

11 MR. CONNOLLY: If there's an add to
12 that line and dispatch is required to the
13 customer location to hang new facilities, that
14 would then ultimately terminate at the Qwest
15 central office?

16 MR. DELLA TORRE: Right.

17 MR. CONNOLLY: What is meant by the
18 CLEC location?

19 MR. WEEKS: I think we may have
20 confused you. As opposed to a CLEC operations
21 center, like a network operations center or a
22 business office or something, I think what
23 we're referring to here is the use of CLEC is
24 misleading here. What we should say is you're
25 going to roll a truck to the customer frame and

1 not just a --

2 MR. DELLA TORRE: The word add will
3 be removed so it reads the dispatching of Qwest
4 staff to CLEC customer locations. We put the
5 word "add" in there inappropriately.

6 MR. WEEKS: Does that clear up the
7 confusion?

8 MR. CONNOLLY: Yes. And it doesn't
9 create other confusions.

10 MR. WEEKS: Okay. Let the record
11 show.

12 MR. DELLA TORRE: At this point in
13 time apply it to the line. Question 14 "The
14 sections on LNP Hot Cuts, ADSL Line Sharing,
15 and Dark Fiber are conspicuously not labeled
16 'Validations.'"

17 They should be; there will be a
18 revision to the report.

19 Question 15, "Please clarify the
20 meaning of the term 'Qwest Mass Market dial
21 tone' in the LNP Hot Cuts section."

22 This is a Qwest retail account.

23 MR. WEEKS: That wording came to us
24 from Qwest documentation, that's how they refer
25 to it.

1 MR. DELLA TORRE: It simply means a
2 retail account.

3 Question 16, "Please explain the
4 meaning attached to 'CLEC capable loop' in the
5 LNP Hot Cuts section."

6 And this is just a facilities base
7 of CLEC.

8 Question 17, "For an instance in
9 which a CLEC is using unbundled loops to serve
10 the customer, the wire pair (loop) from the end
11 user customer (facility or location) physically
12 connects to the CLEC's switch. The customer is
13 not likely to be connected to the CLEC's
14 switch."

15 That is true, the end user would
16 connect to the CLEC co-location through the
17 ILEC's IPS and a report will be revised to
18 reflect that.

19 Question 18, "Please confirm that
20 KPMG Consulting conducted no examination of
21 Qwest's line splitting product(s)."

22 That is correct.

23 Question 19 is a typo and it will be
24 revised.

25 Question 20, "Were provisioning

1 scenarios based on the scenarios listed in the
2 Master Test Plan, Appendix D?"

3 The answer is yes.

4 Question 21, "Please explain the
5 selection criteria and the sample size
6 requirements for the random samples used for
7 each of the following validations: Directory
8 assistance; switch translation; WCNs; CSRs and
9 disconnects."

10 We took a statistical sample of the
11 available test bed, we used the entire universe
12 of quarters and then applied the randomization
13 to that, except in certain cases, where we
14 actually used the entire test bed, which
15 includes the directory listing, disconnects,
16 and the WCNs. So three of the five on your
17 list we did use the entire universe for the
18 test bed. In other cases it was a random group
19 selection.

20 MR. FINNEGAN: What were those
21 again, the entire universe?

22 MR. FALCONE: Directory listings,
23 disconnects and --

24 MR. DELLA TORRE: WCNs. It's the
25 appropriate portion of the test bed.

1 MR. FINNEGAN: Do you recall what
2 sample size you used, what percentage of the
3 test bed you used for the switch translation
4 validation and the CSR?

5 MR. DELLA TORRE: It was greater
6 than 140; however, we don't have the specific
7 numbers so we can take that away and take a
8 look.

9 MR. FINNEGAN: And you had
10 mentioned --

11 MS. THIELEMANN: Carrie Thielemann,
12 KPMG Consulting. I think on all those, Mike,
13 perhaps you can help here, we did retests, so
14 we did an initial sampling and then for the
15 retest we went in and evaluated test bed orders
16 that were available.

17 MR. BUJAN: Carrie, that is correct.
18 Michael Bujan, KPMG Consulting. As we went
19 through the retest we continued to use the test
20 bed that was available and we actually ended up
21 using at the time all of the available test bed
22 from the initial test, and we actually had to
23 have new test bed provision to conclude the
24 testing and issues.

25 MR. DELLA TORRE: We'll get the

1 numbers.

2 MR. FINNEGAN: On the randomization
3 for the ones you used as samples, is that just
4 some random way of identifying the orders?

5 MR. DELLA TORRE: We used the random
6 number generation, didn't we? Yes.

7 MS. MILLER: Charlis Miller, Qwest.
8 Joe, are the numbers listed in the section 14
9 the draft line report? If that helps you out,
10 I guess, I'm looking at page 181 in the
11 footnotes; let's see, it's section 2.4,
12 Evaluation Methods.

13 In some people's version, it's page
14 177.

15 MR. VIVEROS: Charlis, do you have a
16 footnote number?

17 MS. MILLER: Yeah, 51 through 55.

18 MR. DELLA TORRE: In the newer
19 version now it would be 55 through 59.

20 Okay. Question number 22, "Did KPMG
21 Consulting's random sample of orders for the
22 Directory Assistance Database include orders
23 for listings associated with UNE-Loop?"

24 The answer is yes.

25 The follow-up question, "Did KPMG

1 Consulting's random sample of orders for the
2 Directory Assistance Database include orders
3 for stand-alone directory assistance requests?"

4 The answer is no.

5 MR. FINNEGAN: John Finnegan with a
6 follow-up. Is there any reason why not?

7 MR. FALCONE: Bob Falcone, KPMG
8 Consulting. John, in the original test there
9 was an exception on directory listings. In the
10 original test there were stand-alone DLs as the
11 test cases for that. That was part of the
12 original test.

13 In the second test what we tried to
14 do because of the test bed issues is we tried
15 to piggyback a number of different retests on
16 the PID retest. So, if you recall, we had the
17 large PID retests for exceptions 3085, 3086.
18 We used those same accounts while we were doing
19 the retest, also retests for directory listings
20 for CSR validations and switch translations.

21 In the PID retest, there were no
22 stand-alone DL test accounts because they
23 wouldn't count for an OP-3 and OP-4; yet there
24 were a lot of test cases that would qualify
25 both for the OP-3, OP-4 retesting that also had

1 a DL component to them.

2 MR. FINNEGAN: John Finnegan. I
3 understand it from the respect of a test
4 proficiency but my understanding of the
5 processes are there are two different processes
6 for stand-alone directory listings versus
7 resale or UNE-P directory listings, that they
8 follow different paths into Qwest and
9 ultimately into the directory listing database.

10 It is surprising that the effort was
11 focused primarily on the UNE-P and the resale
12 without what appears to be sufficient attention
13 to the stand-alone for those facility-based
14 carriers that do submit stand-alone.

15 MR. DELLA TORRE: The initial part
16 of the test did have stand-alone directory
17 listings and we did not identify issues with it
18 so therefore it was not part of the subsequent
19 retest.

20 MR. FINNEGAN: Then just to clarify,
21 your initial answer was the second part of that
22 question, did KPMG Consulting's random sample
23 of orders for the Directory Assistance Database
24 include orders for stand-alone directory
25 assistance requests, your initial response was

1 no.

2 MR. WEEKS: So the answer is for the
3 initial test yes, for the retest no.

4 MR. FINNEGAN: And for the retest no
5 because there were no problems identified in
6 the initial test?

7 MR. DELLA TORRE: Correct.

8 MR. FINNEGAN: So just to clarify
9 the two answers to the question on AT&T
10 question 22 would be yes and yes?

11 MR. WEEKS: Yes and yes, no.

12 MR. FINNEGAN: Yes.

13 MR. DELLA TORRE: Question 23,
14 "Please confirm that KPMG Consulting conducted
15 no evaluation of Directory Listing database(s)
16 that are used to generate white page or yellow
17 page directories."

18 We reviewed listings in the LSS from
19 which the white pages and Yellow Pages are
20 generated. So we did.

21 MR. CONNOLLY: Do you know, Joe,
22 what is the hand off between LSS and the
23 printer publisher?

24 MR. WEEKS: I don't think we know
25 that.

1 MR. CONNOLLY: Thanks.

2 MR. DELLA TORRE: Question 24,
3 "Please provide a description of the
4 process(es) utilized to request and obtain the
5 switch validations from Qwest."

6 I believe we discussed this briefly
7 earlier where, upon an SOP date, we issued a
8 data request for the switch translation
9 information from Qwest based on the TN.

10 Question 25, "Please list the switch
11 types for which switch validations were
12 conducted."

13 The DMS, 5E, the AXE, the EWSD.

14 Question 26, "The sections WCN, CSR,
15 Disconnect Orders, LNP Hot Cuts, ADSL Line
16 Sharing, Analog Loop and Dark Fiber are not
17 identified as 'Validations.' In what ways were
18 these evaluations performed that precludes them
19 from being identified as Validations?"

20 This was an oversight and will be
21 revised in the final report.

22 Question 27, "What meaning has KPMG
23 Consulting attached to 'pre-activity CSR'?"

24 And that is the existing CSR prior
25 to any provisioning activities that we caused.

1 MR. CONNOLLY: We understood from
2 earlier discussion on the subject that there
3 was a download, if you will, of all CSRs that
4 were designated as test bed accounts. Those
5 would be pre-activity CSRs?

6 MR. DELLA TORRE: Correct.

7 MR. CONNOLLY: In the case where a
8 migration order, for example, was going to be
9 issued for a non-test bed account --

10 MR. DELLA TORRE: We wouldn't issue
11 a migration order on a non-test bed account.

12 MR. CONNOLLY: Were there any cases
13 that you had to issue a CSR request via GUI to
14 obtain a CSR prior to issuing an order to do --

15 MR. WEEKS: That was baked into some
16 of our scenarios where we did that. I don't
17 want to confuse the information that we gather
18 through this direct feed that allows us to
19 populate, if you will -- our customer database
20 is kind of a way to think about it ahead of
21 time. Then we ran scenarios. In many of the
22 scenarios we ran one of the initial steps that
23 HPC executed would be to pull a pre-order CSR
24 as one of the activities as part of executing
25 the scenario, as opposed to one of the

1 activities that we used to validate that the
2 test bed had been established correctly.

3 The original intended purpose of
4 these direct feeds wasn't order related, it was
5 that we could review what had been established
6 or provisioned as the test bed using the CSR to
7 let us see if it had the right features and
8 everything that we ordered. And it was part of
9 had the test been established and validated
10 correctly, now we know the accounts are set up
11 the way we like to see them and we can start
12 executing scenarios. Many scenarios require
13 HPC to execute a pre-order CSR as part of that
14 scenario.

15 MR. CONNOLLY: Thanks.

16 MR. DELLA TORRE: Question 28,
17 "Please describe the process(es) utilized to
18 retain pre-activity CSRs that were evaluated
19 for the CSR Validation."

20 And I just realized that that may be
21 a misnomer. And I just want to make sure that
22 as Mike was just saying that the CSRs that we
23 received in this feed were not the CSRs that we
24 used in the CSR validation tests. But the
25 pre-activity CSRs that were evaluated for the

1 CSR validation, we just had a proprietary
2 Microsoft Access database we used to store that
3 information just as a customer database.

4 Question 29 --

5 MR. CONNOLLY: Excuse me, Joe, how
6 about for the pre-activity CSRs that enabled
7 you to issue these other orders?

8 MR. WEEKS: I think that question is
9 probably better asked of HPC because HPC was
10 actually doing the CSRs, placing the LSRs and
11 so on. So I throw that to them on the fly here
12 even though we haven't prepared them for it.
13 While they're discussing that I'll just explain
14 a little bit more.

15 We kept this master, if you will,
16 this customer master, that we used to select
17 accounts from to identify instances for the
18 various scenarios that we wanted to do. It's
19 kind of like Burger King. We had defined a
20 scenario number 37, we needed to pick a
21 customer that looked like it had the right
22 characteristics so that we can tell -- much
23 like a customer would call a normal CLEC and
24 say I want to migrate my line or something like
25 that.

1 We were sort of simulating, if you
2 will, that customer request for HP and we would
3 send across these what you refer to as jazz
4 files. We would send across a jazz file
5 fundamentally for simplifying sake, please run
6 a number 37 for this customer.

7 So we had to have on our side that
8 knowledge of what customers had what installed
9 so we could instruct CLECs of what to do. I'll
10 let Jeff talk about what they did.

11 MR. MAY: This is Geoff May from HP.
12 These would have been stored in the test
13 performance/test transaction databases for
14 which we still have a connection with KPMG
15 whereby KPMG actually could access that
16 information if they so chose.

17 MR. CONNOLLY: To what extent were
18 these pre-activity CSR files used to populate
19 the orders?

20 MR. MAY: The account information
21 was used in order to populate the test case or
22 instance. I'm sorry, maybe I misunderstood.

23 MR. CONNOLLY: I'm trying to find
24 out the extent to which you used those
25 pre-activity CSR databases to populate the

1 entries and the orders that were specified by
2 KPMG in this instance or a case.

3 MR. WEEKS: Can I ask your question
4 maybe a little differently because I know where
5 you're going, I think. Did you guys use the
6 information we provided you in the Jaz files to
7 populate the orders or did you use the
8 information retrieved from the CSRs you pulled
9 down from Qwest on the fly or both?

10 MR. MAY: Retrieved from the CSRs.

11 MR. CONNOLLY: Gave him an either/or
12 and he took a different one.

13 MR. PETRY: This is Don Petry with
14 HP. The process that we went through in
15 executing the test cases as Mike had described,
16 there would be a test case definition and KPMG
17 had a test, a master test bed, that they then
18 chose accounts and said execute test case 37
19 with this account in Wyoming. That information
20 at a high level was passed over to HP.

21 We would use that information then
22 to go in and based upon the test case, the test
23 case may say perform an address validation,
24 obtain the CSR for the account at this address,
25 do a conversion as specified adding speed

1 calling, date, and so on in the test case.

2 So we would take the information in
3 terms of what test case, what add, to what
4 account to go use, and then we would go ahead
5 and perform each of the pre-order steps
6 required to move into the order activity. So
7 we would perform an address validation. We
8 would then use the information from that
9 address validation to perform a customer
10 service record query.

11 We would bring that information back
12 about everything that was on that customer's
13 account to then go bill the order to do a
14 converted specified or add an additional line
15 and that.

16 So we did not have a view into the
17 KPMG master test bed database. That was on
18 their side of the wall. On our side what we
19 received here is the high-level account
20 information to point you in the right direction
21 and then test cases to go execute. And then we
22 used everything that we received dynamically
23 from doing pre-order activities with Qwest to
24 populate and to submit order activity.

25 Does that answer it?

1 MR. CONNOLLY: I think you just said
2 zero to my question on the extent to which you
3 relied on the pre-activity CSRs to issue the
4 orders, did you not?

5 MR. PETRY: We did.

6 MR. DELLA TORRE: This was my
7 concern about the pre-order activity CSR, that
8 all that means is the existing state, the
9 initial state is actually the best way to say
10 it. The initial state of the customer, that
11 CSR, whether or not that was provided to us
12 through the Qwest feed or whether they, the
13 P-CLEC, went and did a CSR query, the
14 information on that is still the initial state
15 of the customer. So the customer is a retail
16 Qwest customer with the following features on
17 their account.

18 They did use that initial state or
19 pre-activity CSR. They went and queried to get
20 the address validation, did the CSR query, they
21 got the rest of the information on that
22 customer's account from that CSR, that
23 pre-activity CSR. They populated an LSR, sent
24 the order. Now its post-activity CSR that our
25 provisioning team could go in and look at to

1 see if it was updated in the way that we
2 expected it to get.

3 MR. CONNOLLY: Let me cite an
4 example to my question. Maybe that would help
5 me get the answer that you've been diligently
6 trying to hammer into my thick head. At some
7 point in the early stages of the test, you
8 identified the accounts that Qwest gave you as
9 download pre-activity CSRs.

10 MR. WEEKS: We just hit the
11 conflict. Pre activity when we use it means in
12 the context of the scenario. If you mean pre
13 activity, pre commencement, pre initiation of
14 the scenarios and you're referring to that the
15 download activity, that's the source of the
16 confusion.

17 MR. DELLA TORRE: Right.

18 MR. WEEKS: When we mean pre
19 activity, we mean CSRs done initially embedded
20 in the scenario acting just like regular CLECs.

21 MR. DELLA TORRE: You haven't sent
22 an order on it yet.

23 MR. CONNOLLY: So these pre-activity
24 CSRs referenced in the CSRs section here are
25 not these downloads that you provided that were

1 provided by Qwest?

2 MR. DELLA TORRE: Correct.

3 MR. CONNOLLY: Thank you.

4 MR. DELLA TORRE: Sure.

5 Question 29, "Please explain whether
6 the Disconnect Orders evaluation also included
7 verifications that products and services that
8 were not disconnected (i.e., partial
9 disconnects) remained in service following
10 completion of the Disconnect Order."

11 And the answer is true, we did
12 verify the partial disconnects, but did not in
13 kind the remaining lines.

14 Question 30, "Please describe the
15 KPMG Consulting evaluation methods for
16 non-loaded loops."

17 Non-loaded loops were not in scope
18 for the evaluation portion of Test 14.

19 Non-loaded loops were reviewed during the
20 working line test.

21 In that test, our testers were the
22 CLEC's tests and turn-up centers as the CLEC
23 tested and accepted the circuits from Qwest.

24 Question 31, "For the WCN
25 evaluation" --

1 MR. FINNEGAN: Can I interrupt for a
2 second?

3 MR. DELLA TORRE: Certainly.

4 MR. FINNEGAN: To make sure I
5 understand, going through the analysis methods,
6 you drew some conclusion later on in the table
7 on non-loaded loops. So there appears to be a
8 gap in the lists of analysis methods that you
9 use to derive your conclusions in the table.

10 MR. WEEKS: Can you give us a
11 specific test cross-reference example?

12 MR. FINNEGAN: I hope so. On the
13 new version, on page 188, task cross-reference
14 14-1-20: Qwest meets the performance benchmark
15 for PID OP-4C installation interval for
16 non-loaded loops.

17 MR. DELLA TORRE: I think we can
18 clear this up. There are two different things;
19 there is the PID performance evaluation versus
20 the things that we use the test bed for.

21 MR. FALCONE: Bob Falcone, KPMG
22 Consulting. If you recall early on when we had
23 our test bed discussions, we had said that we
24 didn't want Qwest rolling out trucks to take
25 load coils and bridge taps off of these loops

1 unnecessarily as part of the tests. So in Test
2 12 and Test 14, test bed-wise, everything was
3 pre-qualified as non loading, the entire test
4 bed was built as qualified for non-loaded loop.

5 So from a Test 14 standpoint,
6 testing the provisioning of non-loaded loops
7 was -- through this exercise because everything
8 was qualified as non-loading loop already in
9 the test bed. However, we did have HPC order
10 non-loaded loops as part of Test 12 and we were
11 able to establish the criteria for OP-3 and
12 OP-4 installation commitments met and
13 installation interval on how Qwest did with
14 respect to those two PIDs in the Test 12
15 portion of non-loaded loops. So from a
16 provisioning standpoint, they were already
17 qualified, but we were able to make an
18 assessment on the PIDs.

19 MR. FINNEGAN: This is John Finnegan
20 on a follow-up qualified. I think I understand
21 but you didn't observe any being provisioned?

22 MR. FALCONE: In the test bed no;
23 commercial observations, they did.

24 MR. FINNEGAN: I don't know if the
25 distinction between test bed and commercial

1 observation was important or made distinct
2 because by looking at analog loops on page 179,
3 KPMG Consulting reviewed both P-CLEC orders and
4 live CLEC commercial installation.

5 So there appears to be reference to
6 non-test bed observations in addition to test
7 bed observations. And the non-loaded loop
8 looked conspicuous by its absence. If you're
9 trying to say you didn't observe any non-loaded
10 loops being provisioned, that might be the
11 answer. Is that the answer?

12 MR. PETRY: John, in the commercial
13 observations there were non-loaded loops in
14 there. Off the top of my head I can't tell you
15 how many but there were commercial observations
16 of non-loaded loops.

17 MR. FINNEGAN: So why not include
18 that in the analysis method if you are drawing
19 some non-loaded loop conclusions in Test 14?

20 MR. FALCONE: Specifically here in
21 the reference that you look at here for OP-4C,
22 yeah, there we did draw some conclusions about
23 non-loaded loops for the non dispatch. If
24 that's what you're zeroing in on.

25 MR. FINNEGAN: It's not so much the

1 dispatch or non dispatch, it's that you observe
2 some non-loaded loop being provisioned as part
3 of Test 14 and there was no analysis method
4 that described how you arrived at those
5 conclusions that were reached in Test 14.

6 MR. FALCONE: John, if you go to
7 section 14, cross-reference 14-1-21 that's
8 where the commercial observations are.
9 Remember we had this discussion maybe two
10 months ago when we were doing commercial
11 observations. We had come to a conclusion,
12 maybe even a disagreement, later on but in the
13 long term we came to a conclusion that a
14 dispatch is a dispatch, and we were going to
15 look at whatever we got. And in those numbers,
16 in this self-evaluation criteria are analog
17 loops and non-loaded loops.

18 MR. DELLA TORRE: John, the
19 difference is between assessing functionality
20 and adherence to M&Ps and PID performance
21 versus just PID performance. The non-loaded
22 loops we didn't look at the M&P adherence and
23 watch people slam them in. We just gathered
24 the data required to evaluate PID performance
25 for non-loaded loops.

1 MR. FINNEGAN: Is there perhaps a
2 reason why in the final report you would not
3 make that distinction clear?

4 MR. WEEKS: We can. It's obviously
5 not clear or you wouldn't be asking this
6 question so we can take that back and look at
7 it. The question is about analysis methods not
8 results, why in our analysis method section do
9 we not say what you just said.

10 MR. DELLA TORRE: Because we did not
11 do a functional evaluation of non-loaded loops
12 so it's not listed. We don't say what we
13 didn't do.

14 MR. FINNEGAN: My point is it looked
15 like you did do something with non-loaded loops
16 in the context of Test 14.

17 MR. DELLA TORRE: We can probably
18 cut to the chase and just put something in
19 there to explain what we did with non-loaded
20 loops.

21 MR. FINNEGAN: Thank you.

22 MR. DELLA TORRE: Question 31, "For
23 the WCN evaluation, did KPMG Consulting
24 consider the date of receipt of the WCN in this
25 evaluation?"

1 The answer is no.

2 MR. CONNOLLY: Tim Connolly with a
3 follow-up question. That paragraph reads, and
4 this is on my page 184, it's the third bullet
5 in section 2.5, KPMG Consulting analyzed that
6 the timeliness of the WCN, by comparing the
7 committed due date with the actual service
8 completion date. KPMG Consulting analyzed and
9 noted any discrepancies.

10 MR. DELLA TORRE: Tim, this is the
11 oversight that we made that we have discussed
12 earlier where we didn't use the appropriate
13 acronyms. It should be SOC and SOC alone. So
14 it's the service order completion date matching
15 the committed due date in the FOC. There is no
16 WC in the FOC, so we will revise the report to
17 show it's service order completion.

18 MR. CONNOLLY: So it's called
19 service order completion. When you were doing
20 your analysis, it didn't matter when you got
21 that service order completion notice?

22 MR. DELLA TORRE: I don't follow
23 your question, I'm sorry. The service order
24 date matching the FOC due date was the
25 analysis.

1 MR. CONNOLLY: And I'm trying to
2 understand if you got that service order
3 completion notice the day you were supposed to
4 get it, that would have -- that is certainly
5 acceptable. If you didn't get it for a week or
6 two weeks or three weeks, would that not have
7 impaired your analysis? Wouldn't that have
8 been an extraordinary circumstance that you
9 would find?

10 MR. DELLA TORRE: I'm pretty sure
11 there's a whole different PID on SOC
12 timeliness. So SOC timeliness was evaluated.

13 MR. WEEKS: In the test but not in
14 the --

15 MS. ANDERSON: And again and again
16 and again.

17 MR. FALCONE: Bob Falcone, KPMG
18 Consulting. For the SOC timeliness what we did
19 report on but didn't evaluate as diagnostic is
20 the PO 6. Unfortunately the PID is called work
21 completion notification timeliness but it
22 really should be changed to SOC timeliness.

23 MS. ANDERSON: We recognize the
24 mistake.

25 MR. WEEKS: Next.

1 MS. OLIVER: This is Becky Oliver
2 with WorldCom. I would like to ask a follow-up
3 related to this discussion about what was
4 evaluated on the SOC because I had to go back
5 and look at WorldCom question number 21 where
6 we asked "Did KPMG validate the date provided
7 on the WCN," a/k/a SOC, "was the actual date of
8 the service completion?"

9 MR. WEEKS: That's true, we did not
10 go into Qwest systems and didn't follow the
11 text around to make sure for every single order
12 we placed that the date that is reflected in
13 the SOC is the physical date in the real world
14 that actually got committed. What we're doing
15 here is comparing date to date; we are not
16 validating the dates correspond with anything
17 in the real world.

18 MS. OLIVER: I understood there was
19 the validation method, the completion date
20 matched what was provided with the FOC.

21 MR. DELLA TORRE: Correct, FOC to
22 SOC.

23 MR. WEEKS: It's dates to dates;
24 it's not anything to the real world so let's be
25 careful about --

1 MS. OLIVER: So KPMG's evaluation of
2 adherence to M&P did not involve, did that M&P
3 meet the due date.

4 MR. WEEKS: There's other parts of
5 the test where we looked at that but this is
6 not about M&P in here, this is just comparing
7 dates and who different notified us. The
8 particular criteria we're talking about here,
9 it was accomplished by considering the date of
10 one notifier to the date of another notifier.
11 There are other parts of the test we looked at
12 M&P provisioning in here to determine whether
13 the text we were following their M&Ps that
14 result in their internal systems being updated
15 to reflect real world events that then find
16 their way on to notify us.

17 MR. DELLA TORRE: And additionally
18 in this case, this test, we did validate that
19 service was turned up on the FOC due date, on
20 the committed due date.

21 MR. WEEKS: It's a puzzle where
22 there's multiple pieces and we didn't do all --
23 we didn't do everything all in one test. The
24 record is spread across multiple test sections.
25 There are test sections where we compared

1 whether Qwest was following the procedures that
2 they said they should be using in the field and
3 whether or not those procedures led to their
4 books and records being updated on a timely
5 basis and we were satisfied that they were.

6 Then there's a separate process of
7 notifying CLECs where information is taken out
8 of the OSSes that has already been validated
9 being correctly reported by field text and the
10 software. That information is then extracted
11 and inserted into notifiers who are then sent
12 to CLECs.

13 We validated in this case the
14 criteria we're talking about here that two
15 dates on notifiers resulted in a particular
16 aspect of the test that FOCs which had had a
17 committed date on them corresponded well with
18 dates of SOCs that had the dates that the work
19 had been completed in the field per the books
20 and records of Qwest.

21 We made sure that in effect that
22 Qwest was meeting its commitments. If it said
23 it was going to do it next Tuesday it, in fact,
24 did it next Tuesday by analyzing what it said
25 it was going to do and comparing that to what

1 it actually did.

2 MR. DELLA TORRE: Question 32. "For
3 the CSR evaluation, did KPMG Consulting
4 consider the date the CSR became retrievable
5 following completion of the CLEC LSR?"

6 The answer is yes.

7 MR. FINNEGAN: Quick follow-up, what
8 did KPMG consider the committed due date for
9 CSR update?

10 MR. DELLA TORRE: Committed, I don't
11 think we considered a committed. We are aware
12 of the Qwest policy to have CSRs updated within
13 three to five days after the SOC function date.

14 MR. FINNEGAN: Let me phrase the
15 question differently. In the CSR section KPMG
16 Consulting evaluated Qwest's ability to update
17 its CSRs accurately and on the committed due
18 date. So as the term was used there, what did
19 KPMG mean by committed due date. I understand
20 the three to five day but that's not a due
21 date, those are due dates.

22 MR. DELLA TORRE: What that means is
23 the committed date is the FOC due date. So
24 it's three to five days after that FOC due
25 date. So if we received -- if we sent our LSR

1 we received back a FOC that the due date was
2 the 1st of May, we would then use that date and
3 in the window of three to five days after that
4 so May 4th, May 5th, we would actually go and
5 see if the CSR had in fact been validated.

6 MR. WEEKS: And that sentence is not
7 as clear as it should be and I understand
8 John's point.

9 MR. FINNEGAN: Does that effectively
10 become a FOC day plus five days?

11 MR. DELLA TORRE: Yes, that's what
12 we were using, our understanding of the Qwest
13 policy.

14 Question 33. "Please provide the
15 meaning KPMG Consulting has attached to
16 'de-provision.'"

17 that's a disconnect so we will
18 change the report.

19 MR. WEEKS: You didn't connect, so
20 you don't disconnect.

21 MR. CONNOLLY: But it's not
22 unprovisioned.

23 MR. DELLA TORRE: Question 34.
24 "KPMG Consulting notes that it compared
25 provisioning activities with those stipulated

1 in internal Qwest M&Ps."

2 And the word stipulated does in fact
3 mean document.

4 Question 35. "KPMG Consulting
5 states its Evaluation Criteria 'Qwest's
6 directory assistance database contains required
7 field inputs.' Please clarify what is meant by
8 'field inputs.'"

9 And this is -- the listing appears
10 as requested in the LSR.

11 MR. CONNOLLY: Is field as opposed
12 to line function or field as opposed -- field
13 meaning data element.

14 MR. WEEKS: Field is data element in
15 the LSR.

16 MR. CONNOLLY: Thank you.

17 MR. DELLA TORRE: Question 36. "Of
18 the 318 directory listing orders examined,
19 please identify the split between
20 resale/unbundled network element orders
21 submitted via an LSR versus stand-alone
22 listings for facilities-based CLECs submitted
23 via a DSR."

24 We observed or assessed 148 orders
25 that were submitted via LSR. And the remaining

1 167 orders were actually commercial CLEC orders
2 of which I believe 42 were submitted via a DSR.
3 And three orders were submitted using a DL 4.

4 Question 37. "Please identify the
5 types of inaccuracies found during the
6 examination of the 318 directory listing
7 orders."

8 We saw the address not listed, the
9 second possibility of a listing was not in the
10 Qwest database. The third possibility is the
11 listing TN should have been removed from the
12 database.

13 Question 38 --

14 MR. CONNOLLY: Excuse me, Joe, Tim
15 Connolly again. With these inaccuracies that
16 you found, there was no action taken to get
17 them corrected? Does that mean you told the
18 CLEC to do the correcting?

19 MR. DELLA TORRE: No, we did not.

20 MR. WEEKS: That's correct, we did
21 not.

22 MR. CONNOLLY: So was there any
23 attempt made to find the reason or the cause
24 for the inaccuracy?

25 MR. WEEKS: Not on our part. We

1 wrote Os and Es on this. Do you recall the
2 numbers? It's in the report, right?

3 MR. FINNEGAN: No, not from my
4 observation.

5 MS. THIELEMANN: Carrie Thielemann,
6 KPMG Consulting. It's exception 3076.

7 MR. DELLA TORRE: Exception 3076.

8 MS. THIELEMANN: That's in criteria
9 14-1-2 that's in there.

10 MR. DELLA TORRE: That's criteria
11 14-1-2.

12 MR. FINNEGAN: That one appears to
13 be the update wasn't made by the committed due
14 date. The 14-1-1 was inaccurate.

15 MR. WEEKS: So the number is 3042.

16 MR. CONNOLLY: Exception.

17 MR. DELLA TORRE: Observation --
18 exception.

19 MR. WEEKS: Sorry.

20 MR. DELLA TORRE: Question 38.

21 "Please confirm the KPMG Consulting used 48
22 hours after the receipt of the service order
23 completion notice, (SOC), as the committed due
24 date for the purposes of this test cross
25 reference."

1 And in fact we used the FOC due
2 date, not the receipt of the SOC.

3 MR. FINNEGAN: But the 48 hours
4 after receipt of the SOC, that's accurate in
5 terms of the committed due date?

6 MR. DELLA TORRE: Yes.

7 Question 39. "In its initial
8 response to Exception 3076, Qwest indicated
9 that the time between the SOC and the MECH date
10 for stand-alone listings for facilities-based
11 products could be one business day and for
12 resale/UNE products could be two business days.
13 Given that Qwest identified different processes
14 for resale/UNE listings versus stand-alone
15 listings for facilities-based products, why did
16 KPMG Consulting choose one standard (i.e., the
17 lengthier standard) for both types of listing
18 processes?"

19 We compared the SOC and the MECH
20 date using two business days because the orders
21 validated were resale and UNE products. KPMG
22 testers did not review orders where DL changes
23 were required for stand-alone LNP.

24 MR. FINNEGAN: Are you sure?

25 MR. BUJAN: Michael Bujan, KPMG

1 Consulting. That's consistent with the retest.
2 We evaluated those stand-alone orders as part
3 of Test 1 and then we conducted a retest, so
4 this answer is geared toward the retest.

5 MR. FINNEGAN: So for the initial
6 test where you determined you did look at the
7 stand-alone directory listings, the committed
8 due date is the SOC plus 24 hours or is the
9 committed due date SOC plus 48 hours?

10 MR. BUJAN: For the initial test, we
11 looked at orders within 48 hours after the SOC.
12 So it could have been within 24 hours or we
13 went up to as much as 48 hours after. So we
14 used a consistent methodology, which was on the
15 higher side, the 48 hours as opposed to the 24
16 hours.

17 MR. FINNEGAN: So you chose
18 consistency over recognition of the different
19 processes and the different expectations as
20 indicated by Qwest?

21 MR. DELLA TORRE: Yes.

22 MR. BUJAN: Yes.

23 MR. DELLA TORRE: Question 40. "For
24 the 5 percent of the directory listings that
25 were not updated by the committed due date,

1 please provide the percentage of those listings
2 that were never updated in the directory
3 assistance database."

4 We did not do any regression testing
5 of the 5 percent that were not updated by the
6 committed due date.

7 Question 41. "Please describe how
8 KPMG Consulting measured and accounted for
9 'accuracy of provisioning.'"

10 Evaluation criteria 14-1-3, Qwest
11 switched translations contained required field
12 inputs. And to verify the accuracy of the
13 switched translations KPMG Consulting compared
14 the switch translation data to the LSR to
15 ensure that all services and features were
16 provided.

17 MR. FINNEGAN: To simplify, if you
18 added five features to customer service, would
19 that be, so to speak, five in the denominator
20 for that particular work?

21 MR. WEEKS: Are you getting how we
22 did our calculations or how we did the work?

23 MR. FINNEGAN: How you did the
24 calculations. I understand how you did the
25 work.

1 MR. WEEKS: Okay.

2 MR. FINNEGAN: But in terms of the
3 calculations, if you missed one feature out of
4 five.

5 MR. WEEKS: One out of one because
6 it was one LSR, one out of five because it was
7 five features.

8 MR. DELLA TORRE: It was per
9 account. So missing one out of the five would
10 count as a miss. One miss out of one attempt,
11 not one miss out of five.

12 MR. WEEKS: It's how many LSRs are
13 correct, not how many features are correct.

14 MR. FINNEGAN: That's for all of the
15 fields.

16 MR. WEEKS: You have to get them all
17 right or you have got to count it as if they
18 were all wrong.

19 MR. FINNEGAN: Thank you.

20 MR. DELLA TORRE: Question 42 --

21 MR. CONNOLLY: Excuse me, you said
22 that was on an account basis did you mean.

23 MR. DELLA TORRE: LSR on an order
24 basis. So we were requested five features to
25 be added to the line and only four were added.

1 That was counted as one wrong out of one try,
2 100 percent failure.

3 MR. CONNOLLY: For an order that had
4 several lines and different feature
5 arrangements on it still one for one?

6 MR. DELLA TORRE: It was on an LSR
7 level, correct.

8 MR. CONNOLLY: Thanks.

9 MR. DELLA TORRE: Question 42. "For
10 the 4 percent the switch translation disconnect
11 orders that did not get completed on the
12 committed due date, please identify the percent
13 of those disconnect orders that were never
14 disconnected, or that required another LSR ..."

15 This is the same answer as question
16 40. We did not assess the 4 percent that
17 didn't work.

18 Question 43. "KPMG Consulting
19 reports that it observed Qwest's provisioning
20 of tasks associated with each of the
21 validations in these Test Cross References.

22 "Is provisioning synonymous with
23 performing for purposes of these test cross
24 references?"

25 The answer is yes.

1 And finally question -- no, not
2 finally, finally here.

3 Question 44. "Did KPMG Consulting
4 ever acquire from Qwest documented methods and
5 procedures to demonstrate that Qwest has a
6 process that is used in the cases when an end
7 user is on the line at the time of the
8 conversion?"

9 The answer is yes.

10 MR. WEEKS: It's just go ahead and
11 pull it.

12 MS. ANDERSON: And laugh.

13 MR. FINNEGAN: A quick follow-up,
14 and you've found those M&Ps to be acceptable?

15 MR. DELLA TORRE: Yes, this was
16 related to Exception 3009.

17 Question 45. "It appears from
18 Qwest's response to Exception 3012 that Qwest's
19 testing for the provisioning of ADSL line
20 sharing appears limited to ensuring that the
21 voice portion of the loop remains functional.

22 "In what ways does Qwest test the
23 activities it performs with respect to the high
24 frequency portion of the shared loop?"

25 It is our understanding that Qwest

1 performs a continuity test.

2 Follow-up question to that, "If
3 Qwest has no process to test the activities
4 ..."

5 But we would just answer that it
6 does.

7 Question 46. "Does KPMG Consulting
8 consider its finding that Qwest has not
9 demonstrated a consistent document
10 control/management process that ensures correct
11 and current versions of documentation are
12 available on a material or an immaterial
13 finding?"

14 KPMG Consulting does not speculate
15 on the matter of materiality.

16 MR. FINNEGAN: Let me ask a
17 follow-up. That was what appeared to be
18 deficiency that was identified by KPMG that
19 didn't appear to warrant and not satisfy on the
20 evaluation criteria.

21 What should be taken from that?

22 MR. DELLA TORRE: The referenced
23 Exception 3012 actually had a number of items
24 and issues identified in that exception. Most
25 of which were resolved to our satisfaction.

1 The notion of consistent document control was
2 one subset or one sub issue or item in this
3 exception. And it was not enough for us to
4 keep the exception open. We were able to
5 satisfactorily address the remaining items in
6 this exception so that it was closed and then,
7 therefore, didn't result in an unsatisfied for
8 the report.

9 MR. FINNEGAN: As of today, would
10 that finding with respect to the document
11 control and management process still be
12 current?

13 MR. DELLA TORRE: No, we have
14 learned since this point that Qwest has taken
15 corrective actions for this document control
16 and management processes.

17 There is also a relationship here to
18 observation 3054, which we actually just closed
19 this past Friday. So there has been
20 development and corrective action being taken
21 by the company throughout from this point until
22 as recently as last week.

23 MR. FINNEGAN: So observation 3054
24 is related?

25 MR. WEEKS: Is related.

1 MR. DELLA TORRE: Yes.

2 MR. WEEKS: And also 3102.

3 MR. DELLA TORRE: Question 47.

4 "KPMG Consulting states, quote, Qwest post
5 order CSRs are consistent with required field
6 inputs from submitted pre-order CSRs.

7 "Please provide the meaning attached
8 to 'required field inputs.'"

9 This means that all the fields,
10 including changes due to provisioning
11 activities that needed to be updated.

12 As an example, a very simple example
13 is a name change. If the order required a name
14 change, the CSR should reflect the new name in
15 the post activity versus the former name in the
16 pre activity.

17 The follow-up question, "Please
18 provide the meaning attached to 'pre order
19 CSRs.'"

20 And this was the same as the
21 pre-activity CSRs or initial state CSRs, all
22 have the same name.

23 Question 48 --

24 MR. CONNOLLY: Excuse me, Joe, Tim
25 Connolly. Maybe I'm just struggling through

1 the choice of language here, but isn't it the
2 case that the post-order CSR should be
3 consistent with the LSR?

4 MR. DELLA TORRE: Correct.

5 MR. WEEKS: That would be true, too.
6 What we're trying to say is you take the
7 pre-order CSR, the LSR, you add it all up, you
8 ought to get to the CSR so I agree with you.

9 MR. CONNOLLY: That is confusing.

10 MR. DELLA TORRE: Question 48.

11 "Please explain how KPMG Consulting determined
12 CSR update accuracy."

13 We were just there.

14 Pre-activity CSR, LSR, post-activity
15 CSR.

16 MR. FINNEGAN: Is another one if you
17 get one wrong on any of the fields, you get a
18 miss for the whole CSR?

19 MR. DELLA TORRE: Yes.

20 MR. WEEKS: It's right or wrong.

21 MR. FINNEGAN: Tough love.

22 MR. DELLA TORRE: Question 49.

23 "Please explain the method(s) used by KPMG
24 Consulting to determine the committed due dates
25 for CSR updates."

1 And this is what we discussed
2 earlier that we went to look for post-activity
3 CSRs being in place as compared to the
4 completion date on the FOC.

5 MR. CONNOLLY: Would you entertain
6 some language modifications there? This
7 committed due date on CSRs is really -- that's
8 downright confusing.

9 MR. DELLA TORRE: Absolutely.

10 Question 50. "KPMG Consulting
11 states its evaluation criteria 'Qwest's CSR's
12 are updated on committed due dates.'"

13 We've been here several times; we
14 will revise that.

15 Question 51. "How was KPMG
16 Consulting able to distinguish MSA-type analog
17 loops from Zone-type analog loops?"

18 And PID OP-3C does not disaggregate
19 by MSA and Zone.

20 MR. FINNEGAN: John Finnegan with a
21 follow-up. The basis for this question is the
22 large, large majority of loops, at least
23 reported by Qwest, regionally would be Zone
24 type, eligible for OP-3D or OP-3E where it
25 appears the large majority of the loops for the

1 tests were considered in OP-3C. I think there
2 might have been some OP-3A, but I'm not sure.

3 But it seemed odd that there was an
4 OP-3C of non-dispatch PID applied to analog
5 loops.

6 MR. FALCONE: Bob Falcone, KPMG
7 Consulting. John, OP-3C for the non-dispatch
8 loops were using test bed counts to measure
9 that PID. That's why we have data on that.
10 OP-3 A, B, D and E again was commercial
11 observations because that's the only place we
12 got our dispatches and that was all products.

13 So in there there were analog loops,
14 non-loaded loops as we just talked about
15 earlier, it's whatever we were able to get and
16 see while we were out with the participating
17 CLECs. So we did report separately on OP-3 A,
18 B, D and E and some of that has benchmark
19 criteria and some of that has a parity standing
20 depending on the product.

21 And for this specific question the
22 test cross-reference that you're giving is
23 OP-3C which is strictly test bed accounts.

24 MR. FINNEGAN: But even with test
25 bed accounts, I understand or if I remember,

1 these were the 50-foot loops?

2 MR. FALCONE: Right. Well, they
3 were spare facilities that went out into the
4 street but they didn't terminate anywhere.

5 MR. FINNEGAN: Correct, but Qwest
6 had a technician in the central office moving
7 wires around.

8 MR. FALCONE: Absolutely.

9 MR. FINNEGAN: So that at least as
10 Qwest measures it, even though there was no
11 technician sent to the customer's premises,
12 Qwest still would have considered that an OP-3D
13 or an OP-3E. If you look at, just to provide
14 some context, if you look at the regional
15 results, regionally February of 2002, Qwest had
16 five orders for non-dispatch analog loops under
17 the OP-3C.

18 MR. WEEKS: So you're saying because
19 a technician got involved and did something
20 technical we should not account it as a C, we
21 should account it as an A.

22 MR. FINNEGAN: Or an E.

23 MR. FALCONE: I'm not sure I agree
24 with that. A technician always gets involved
25 in an unbundled loop, there are always wires

1 that have to be moved on a frame.

2 MR. FINNEGAN: Right.

3 MR. FALCONE: But the technician
4 doesn't always have to get in the truck and
5 I'll defer to Qwest on this, but if it's
6 reusing existing facilities, there is no reason
7 why Qwest would have to do a truck roll unless
8 they were doing some kind of quality
9 cooperative testing. All that work can be done
10 right within the central office which could
11 then be OP and I'm not a PID expert so I'll
12 certainly defer to Chris but in my mind that's
13 an OP-3C effect.

14 MR. FINNEGAN: I'm not disagreeing
15 with how you characterize the activity. What I
16 am disagreeing with is from a PID perspective,
17 unless Qwest wants to correct me, Qwest would
18 have counted it as an OP-3D or an OP-3E.

19 MR. VIVEROS: Chris Viveros with
20 Qwest. And that would depend on as we
21 augmented the PID for a CLEC, analog loops in
22 particular can fall under either the design or
23 the non-design flow and either be reported on a
24 Zone-type basis or an MSA, non-MSA basis.

25 And primarily your two-wire analog

1 loop was commonly known from a wholesale
2 product standpoint as a quick loop, not looking
3 for conditioning, not non loaded, install or
4 conversion to support voice service can go in
5 through our non-designed process and, when it
6 follows that non-design process, it gets
7 reported in OP-3 A, B or C depending on whether
8 or not there is a dispatch out or not and, if
9 there is a dispatch out, whether it falls in
10 MSA or non MSA.

11 MR. WEEKS: So let's ask Qwest.
12 Given what we had with the test bed, where does
13 Qwest believe we should have put these test bed
14 instances?

15 MR. VIVEROS: I think as a result of
16 the artifact of the way the test was designed
17 and the test bed was built that you would see a
18 high percentage of these orders that could have
19 followed that non -- that did follow that non-
20 design flow in converting retail customers to
21 analog loop. Still these were all in place and
22 they would have -- yes, they would have
23 followed that quick loop flow or they certainly
24 had the opportunity to follow the quick loop
25 flow and end up being your OP-3A, B, C

1 categories.

2 MR. DELLA TORRE: Just for -- I'm
3 not sure if anyone will think this matters, but
4 I believe the benchmark is six days for all of
5 them. So whether it's A, B, C, D, or E it's
6 still six days.

7 MR. FINNEGAN: So if we get back to
8 the original question, you didn't distinguish,
9 you just assumed they were all OP-3C?

10 MR. WEEKS: We believe that was the
11 correct sequence of events for the test bed.

12 MR. FALCONE: For the test bed
13 accounts there were no dispatches so we assumed
14 they were all OP-3C.

15 MR. WEEKS: Rightly or wrongly,
16 that's what we've done.

17 MR. DELLA TORRE: Question 52.
18 "Please describe the unexpected outcome of a
19 WFA," it's W-F-A, "a WFA script implemented to
20 prevent dispatches for design services on test
21 bed accounts.

22 "The PID at issue was concerned with
23 commitments met for non-dispatched orders
24 (OP-3C). Why would a script implemented to
25 prevent dispatches affect results for

1 non-dispatched orders?"

2 This has a bit of history so I'm
3 going to actually refer it to Bob Falcone.

4 MR. FALCONE: Gee, thanks. Early on
5 in this test, we were trying and struggling
6 with why trucks were being rolled on test bed
7 accounts for test cases that would typically
8 require a truck roll. And those were adding a
9 new loop through an existing customer or adding
10 service, unbundled loop service, to new
11 customers, those were the two scenarios
12 involved or moved, I'm sorry, three scenarios
13 or a customer moved.

14 It turns up because these were
15 designed services, Qwest's process had to have
16 a truck roll and because these were being
17 subjected to WFA, they had to put a script into
18 WFA that would catch all these orders from the
19 pseudo CLEC and it would prevent the truck
20 roll. And at the time when we talked about
21 this is when we started this because we had
22 some trucks rolling looking for non-existent
23 addresses. When we talked about this we walked
24 through it and we said that sounds like it's
25 going to work. We tested it, it was working

1 and we stopped the truck rolls and we thought
2 that was a good thing.

3 The unexpected outcome that
4 prevented us from counting these orders toward
5 these PIDs was that the way the WFA script
6 prevented the truck roll is it completed the
7 order before the due date.

8 Therefore, if we took all these
9 orders and held them to the PID and counted
10 them toward the PID, Qwest's performance would
11 have looked a lot better than it really was.
12 So therefore, we had to discount any order that
13 was subjected to the WFA script and, therefore,
14 they couldn't count toward the 140 objective
15 that we were trying to get to in each region on
16 those products.

17 MR. FINNEGAN: So that the truck
18 roll was prevented, but there was still the
19 technician going into the CO moving wires
20 around?

21 MR. FALCONE: Right. The CO work
22 was still done and that generally there was no
23 wires to run, wires had to be established, if
24 you will, because these again were news or
25 adding a line to an existing UNE customer. So

1 typically the central office technician had to
2 go in and take the spare facility out in the
3 street and assign that to the CFA that was put
4 on the order by pseudo CLEC and make that
5 connection on the main distribution frame from
6 the customer's loop to the pseudo co-location.

7 And that work was done and
8 coincident with that work in a typical CLEC a
9 truck would be rolling to make the connections
10 at the customer's premises and whatever else
11 had to happen in the street, at junction boxes
12 and what have you.

13 Again, what we were trying to do is
14 not have trucks looking for addresses that
15 didn't exist.

16 MR. FINNEGAN: In the last response
17 to the last question we heard Chris talk about
18 these should be and were correctly accounted in
19 the non-design flow.

20 MR. FALCONE: Um-hum.

21 MR. FINNEGAN: And as such they
22 would naturally have not had a dispatch. If
23 there were truly a non-design process flow,
24 that naturally would have no dispatch, why the
25 need to put the brakes on the truck roll as if

1 it were a design process?

2 MR. FALCONE: I may need help from
3 my WFA script friends back there. But what we
4 found was on any order that typically would
5 have a dispatch and, again, I think that's the
6 key on a new add or new customer, any order
7 that typically had a dispatch, the WFA script
8 kicked in to prevent that truck roll.

9 In that case it doesn't matter if
10 it's design or not design because a truck has
11 to roll. If you're adding a line to a customer
12 you need to roll a truck. Any migrations that
13 we were doing we were reusing facilities we
14 didn't have position.

15 MR. WEEKS: I take it the
16 distinction is between migrate versus move
17 between the previous question and this
18 question? What is the question, Chris?

19 MR. FINNEGAN: I can restate the
20 question if you want.

21 MR. VIVEROS: Yeah.

22 MR. FINNEGAN: If these were
23 rightfully non-designed process flows that
24 should not have induced a dispatch, why the
25 need to put the WFA C edits in place to stop

1 what you had stated shouldn't happen in the
2 first place?

3 MR. SIMANSON: Scott Simanson,
4 Qwest. John, basically what was happening is
5 the orders were, there is a FID that would
6 belong on that type of order and so the actual
7 center was reviewing the order and knew that
8 the class of service required a fill dispatch
9 and was actually forcing a FID that would drive
10 it to the field because they knew the order
11 wouldn't line up necessarily with what the
12 product was and there wasn't a way to get it to
13 the field. So they were saying, not knowing if
14 this was a pseudo-CLEC order, thinking it was a
15 regular order, would say, oh, I have a problem,
16 we're not going to dispatch on this order, and
17 they were forced out into the field.

18 So we had to do the script so we
19 wouldn't hurt the blindness aspect of the test
20 so they implemented or continued to do their
21 process and we would undo their process behind
22 them so they wouldn't recognize that we were
23 dealing with pseudo-CLEC orders.

24 MR. FALCONE: Before we move on,
25 Joe, there is a second part to this question

1 which was on identifying the dates of the TAG
2 meetings at which this WFA script
3 implementation was discussed.

4 These were not necessarily discussed
5 during the TAG meetings; however, they were on
6 the agenda and discussed on the weekly test bed
7 call meetings and they were on the meetings of
8 March 15th, 22nd, 29th, April 5th and
9 April 12th. Obviously this was a long-standing
10 issue that we worked through over a number of
11 weeks.

12 And it was discussed once we had a
13 fix, it was discussed on the April 12th TAG
14 call to discuss what the final outcome was and
15 that we could move forward with these.

16 MR. DELLA TORRE: Question 53.
17 "Please identify each of the products that
18 comprise the orders reported in this test cross
19 reference," specifically 14-1-18.

20 And these were UNE Loop commercial
21 observations that we broke down by region.

22 There is information on the lower
23 levels of disaggregation in observation 3080
24 and Exception 3106 if anyone would like to take
25 a look.

1 MR. CONNOLLY: 3076?

2 MR. DELLA TORRE: 3080 and 3106.

3 The first one is an observation, the second is
4 an exception.

5 Question 54. "Please explain the
6 reasons why analog loop orders were submitted
7 with a due date greater than the standard
8 interval."

9 There were two reasons for this.
10 The first was that some orders were
11 intentionally issued with longer-than-standard
12 intervals so that we could coordinate,
13 coordinate the efforts for the LNP due-dated
14 orders; this is for all field personnel.

15 MR. FALCONE: On those orders we
16 were working with four CLECs, we had to
17 coordinate our ability to be with the CLECs at
18 the time when the cuts were going on so we
19 could watch the cut and coordinate being with
20 Qwest so we could watch all aspects of it. So
21 in those cases this HPC was constructed to use
22 an interval that was greater than standard
23 interval.

24 MR. DELLA TORRE: The second reason
25 was actually a submission mistake.

1 The following question to that is
2 "Please identify by region the number of analog
3 loop orders excluded from the OP-4C calculation
4 due to intervals greater than the standard."

5 The answer is 264 pounds in total,
6 112 in the central, 64 in the eastern and 88
7 western.

8 And then another follow-up question,
9 "Please identify the date(s) in the TAG
10 meeting(s) where it was discussed that the
11 target sample size of 140 would not be
12 achieved."

13 The group consensus seems to be that
14 it was early March on a TAG call but I'm afraid
15 we can't give you the specific dates.

16 MS. ANDERSON: This is Denise
17 Anderson. And I think it was mentioned briefly
18 on a TAG call but then the analysis was
19 actually distributed to the full TAG separately
20 and I could get that date.

21 MR. FINNEGAN: Just a follow-up and
22 perhaps my recollection, I recall there was a
23 discussion that because of reasons of Qwest's
24 greater than the standard interval, the
25 eligible transaction for OP-4 was reduced and

1 that KPMG and HP, whoever, whomever were taking
2 steps to achieve the sample size.

3 I don't recall it ever being
4 discussed that the sample size was not
5 achieved.

6 Is what you're saying that that
7 discussion did occur or was that something that
8 should have been picked up if one were to read
9 the analysis?

10 MR. FALCONE: That's a multi-part
11 question. I'll answer some of it, and I'll
12 defer the other part to somebody else. But in
13 the sample sizing, and you're right, John, in
14 the discussion of the sample size, the problem
15 came to light in the PID retest. The PID
16 retest involved UNE-P and resale only and was
17 the retest of exceptions 3085 and 3086.

18 So when that came to light, what we
19 did do, part one of your question is, we got a
20 bunch more accounts, a bunch more meaning about
21 750 more accounts that we needed because we had
22 to throw all those out because of the interval
23 being wrong and we cranked them through a
24 second time or another series of test cases
25 with those so that we could get the sample size

1 for resale and UNE-P. At the same time Denise
2 had said, let's go back and look at original
3 Test 12, we were not retesting UNE Loops, to
4 see what was the impact on the original Test 12
5 insofar as being incorrect or in the case of
6 UNE Loops LNP and that's where we came up with
7 these numbers.

8 And being there was no retest, there
9 was no effort to get those numbers up to the
10 objective size.

11 MR. FINNEGAN: Was that ever
12 discussed at the TAG that looking back at Test
13 12, there was an understanding that the sample
14 size targets had not been achieved and that
15 there was to be no remedial action to receive
16 those?

17 MR. FALCONE: Not that I recall.

18 MS. ANDERSON: I don't believe so.

19 MR. FINNEGAN: If I understood,
20 there is some document where it would have been
21 explicit or implicit that the sample size
22 targets would not have been achieved?

23 MR. FALCONE: There was a document
24 that was published at TAG showing the impact of
25 the non-standard interval on all test accounts,

1 not just the resale.

2 MR. FINNEGAN: This is sometime in
3 early March of 2002?

4 MR. DELLA TORRE: Yes.

5 MR. FALCONE: We can get you an
6 update by next break, probably.

7 MS. ANDERSON: Tomorrow for certain.

8 MR. DELLA TORRE: Question 55.

9 "KPMG Consulting determined that Qwest had met
10 the OP-8C Number Portability Timeliness measure
11 for LNP Loops without coordination with a
12 sample size of 15 orders.

13 "At what volume of transactions does
14 KPMG Consulting conclude that the volume is too
15 small to make a conclusion?"

16 For the dual test, there is no
17 minimum volume. However, the smaller the
18 sample size, the more likely the dual test will
19 result in a no decision.

20 For benchmarks we use a sample size
21 of ten as the measure.

22 Question 56. "How did KPMG
23 Consulting determine and verify that a customer
24 was not ready to permit Qwest to complete the
25 required installation activity?"

1 Now, DS1s are the only portion of
2 the test of 12 bore 14 transaction tests that
3 utilized working services that terminated at a
4 real customer location. KPMG Consulting was of
5 the end-com for these transactions.

6 During the course of the test there
7 were a number of instances where KPMG
8 Consulting's end-com number received a call
9 from the Qwest technician who was unable to
10 complete the order because he or she was unable
11 to gain access to the location.

12 In these limited number of cases
13 KPMG Consulting agreed that the order should be
14 put into jeopardy status.

15 The follow up question to that "How
16 many DS1 loop orders were excluded for reasons
17 of customer not ready?"

18 The answer is five.

19 Question 57. "Using the products
20 identified as the 'Product Reporting' section
21 of the OP-3 PID, please identify the loop types
22 that KPMG Consulting considered DS1 loops."

23 Results being reported here of all
24 DS1 capable loops that involved an inward
25 activity, i.e., a new customer, adding an

1 existing customer of migrations of existing DS1
2 loops from retailers to you.

3 And finally question 58 and I think
4 I'm saying finally appropriately this time,
5 "Please describe the process that KPMG
6 Consulting used to identify trouble reports
7 that were created within 30 days of
8 installation."

9 KPMG Consulting requested trouble
10 history logs for live CLEC commercial orders of
11 working lines, DS1s and xDSL loops. These logs
12 were reviewed to identify which circuits
13 resulted in the creation of a trouble report
14 due to a Qwest network issue. The results were
15 then compared against the retail equivalent.

16 Other questions on Test 14?

17 MR. FINNEGAN: Can we go back to
18 question 57 for a moment? Under resale on the
19 product reporting for MSA-type disaggregation,
20 I don't see any reference to DS1 loops or
21 anything that would look like a DS1 loop in the
22 PID.

23 MR. FALCONE: There is none in
24 resale.

25 MR. FINNEGAN: So would that

1 preclude any DS-1 findings on OP-3A and OP-3D?

2 MR. FALCONE: No, we are mixing
3 things up here I think, John, or maybe I didn't
4 understand your question. There is no resale
5 DS1 capable loop in the scope of this test.
6 There were DS1 loops in these tests, an
7 unbundled product, and we did a bag full of
8 those. But I'm not sure I understand your
9 question now.

10 MR. FINNEGAN: Well, my point was
11 and rather than put it in the form of a
12 question, I agree. And, therefore, the only
13 analysis that could be done for unbundled DS1
14 loop would be for OP-3D and OP-3E. There is no
15 such thing as an OP-3A DS1 unbundled loop.
16 There is no such thing as an OP-3B DS1
17 unbundled loop.

18 MR. FALCONE: Okay. Allen says that
19 sounds right.

20 MR. WILLIAMS: This is Mike Williams
21 with Qwest. Those DS1 type products or DS1
22 capable loops for resale DS1 are measured only
23 under the Zone type reporting. They aren't
24 captured at all under A, B or C of OP-3 or
25 OP-4.

1 MR. FINNEGAN: Would it be fair to
2 say then for test cross-reference 14-1-26
3 evaluation criteria would be Qwest meets the
4 parity performance requirements for PID OP-3D
5 and E?

6 MR. DELLA TORRE: Not A and B.

7 MR. FALCONE: If you look at 14-1-25
8 where we were doing A, B, D and E together for
9 all other products we just got carried away.

10 MR. DELLA TORRE: We'll revise our
11 report to reflect only D and E. Other
12 questions on Test 14? Okay. Why don't we take
13 our --

14 MS. OLIVER: Denise Oliver from
15 WorldCom. I had one follow-up item related to
16 WorldCom's last question number 25 in the draft
17 final report section 2.1 for stand-alone LNP
18 validation. It states "A provisioning process
19 involves Qwest switch provisioning to install
20 non traditional triggers and installation of
21 directory information."

22 What validation activities did KPMG
23 perform for the installation of directory
24 information?

25 MR. DELLA TORRE: Could you try that

1 again? I'm sorry, I didn't --

2 MS. OLIVER: Sure. This follow-up
3 question is related to the last WorldCom
4 question which was number 25.

5 MR. DELLA TORRE: Right.

6 MS. OLIVER: And I'm referencing in
7 section 2.1 of the draft final report under
8 Stand-Alone LNP Validation there is a sentence
9 that reads: The provisioning process involves
10 Qwest switch provisioning to install non-
11 traditional triggers and installation of
12 directory information.

13 MR. DELLA TORRE: Okay.

14 MS. OLIVER: So my question is what
15 validation activities did KPMG perform for the
16 installation and the directory information?

17 MR. DELLA TORRE: The DL
18 verification didn't differ for stand-alone
19 LNPs. We went to see that the listing was
20 actually right in the database, that the
21 information in the database was as we expected
22 it to be for the stand-alone LNPs as we did for
23 the other directory listings as well.

24 MS. OLIVER: I have to go back to
25 the answer just before it.

1 MR. DELLA TORRE: And that was
2 because of what we were discussing earlier I
3 think with the notion of retest versus original
4 test where we represented originally in our
5 discussions here and our answers to the
6 questions was it focused solely on the retest
7 activities that we did where there was no DL
8 LNP activity. But there was initially and we
9 misrepresented that earlier in responding to
10 these questions. The same was true for AT&T.

11 MS. OLIVER: Okay. Thanks.

12 MR. FINNEGAN: John Finnegan. Just
13 one quick follow-up. Test cross-reference
14 14-1-28 would also have to be updated pursuant
15 to the DS1 loop discussion.

16 MR. FALCONE: I made that note. Got
17 it.

18 MS. ANDERSON: Well, we have
19 succeeded in making up all that time we were
20 ahead. So that's good. We're five minutes
21 ahead of schedule, that would have been an hour
22 ahead of schedule. So we'll take a break and
23 be back at 3:15 and continue on. Thank you.

24 (Recess taken from 2:53 p.m. to 3:12
25 p.m.)

1 MR. DELLA TORRE: Okay. We'll start
2 with WorldCom question number 1 for Test 16.
3 "At what point in processing trouble reports
4 (TRs) which are submitted via CEMR is manual
5 intervention employed to move the TR through
6 MEDIACC and WFA/C (for designed services) and
7 LMOS (for non-designed services)?"

8 It's our understanding that there is
9 no manual intervention of that process.

10 Question 2. "How does WFA/C
11 determine the objective date and time to assign
12 to each TR?"

13 We did not assess the assignment of
14 the date and time.

15 Question 3. "How does LMOS
16 determine the commitment date and time to
17 assign to each TR?"

18 That's the same response; we did not
19 assess the assignment date and time.

20 MS. OLIVER: Becky Oliver, WorldCom.
21 Will Qwest be able to provide a response to
22 either of those questions 2 and 3?

23 MR. DELLA TORRE: So the first
24 question was the assignment of objective date
25 and time and WFA/C.

1 MR. SIMANSON: I'm not sure what
2 objective date and time is referencing.

3 MR. WEEKS: It's the target --

4 MR. SIMANSON: So commitment time.

5 MR. WEEKS: Yes. It's the target
6 time that the system loads out there based on
7 the tables you guys have determined.

8 MR. SIMANSON: So 2 and 3 are the
9 same question?

10 MR. DELLA TORRE: One is for WFA/C
11 and one is for LMOS and it's all based on
12 product --

13 MR. SIMANSON: It's all based on
14 product type and time and date the report is
15 generated or requested. So every product has
16 its own standard interval. So there's a table
17 that goes back and looks at the product type
18 based on the record and establishes the
19 commitment time associated with that. Scott
20 Simanson, Qwest.

21 MR. DELLA TORRE: Question 4. "How
22 does a CLEC using CEMR to submit a TR indicate
23 a special condition such as circuit severity or
24 a medical emergency so that WFA/C and LMOS will
25 process the TR accordingly?"

1 And it's different for design
2 services versus non designed. For designed
3 services the CLECs can indicate special
4 conditions within the priority information and
5 description remark field of the Create Design
6 Report screen. For non-designed services CLECs
7 can indicate special conditions within the
8 diagnostic process conducted via the repair
9 call expert, RCE.

10 Question 5. "Does LMOS or WFA/C
11 process TRs for UNE-P (loop with port)?"

12 And UNE-P trouble tickets are
13 consisting LMOS.

14 MS. OLIVER: Becky Oliver, WorldCom.
15 Follow-up. Back on question 4, the process you
16 described for non design within the diagnostic,
17 is that that option of using the diagnostic
18 test, is that something KPMG verified and is
19 documented in one of the CEMR user guides that
20 they can do that?

21 MR. DELLA TORRE: Yes. Question 6.
22 "Up to what point in time following the service
23 order completion for a newly migrated service
24 will a TR which is submitted via CEMR and
25 created in LMOS flow automatically to a Qwest

1 representative for a manual review?"

2 We did not assess that time period.

3 Question 7. "Are TRs for newly
4 established services (e.g., new UNE Loop)
5 accepted provisionally in CEMR and routed to a
6 Qwest representative as are TRs for newly
7 migrated services?"

8 And again, we did not assess that.

9 Question 8. "For the 156 TRs
10 created for newly migrated services within 24
11 hours of the service order completion, what was
12 the range of times following SOC when the TRs
13 were created?"

14 These were all within a 24-hour
15 period; however, we did not really measure that
16 in smaller intervals than 24 hours. We just
17 did it within the 24-hour window.

18 MR. WEEKS: I think in this case to
19 be real clear about exactly what we did we used
20 the date provided to the pseudo CLEC and the
21 FOC as being the date in which the company had
22 committed to do that. We presumed that they
23 were going to make that commitment. We then
24 went in and submitted the troubles within 24
25 hours of that time. So we didn't wait for the

1 SOC to come in and then go submit the TR. We
2 were actually driving off of, not receipt of
3 the SOC, but what had been committed previously
4 in the FOC. We went in within 24 hours after
5 that.

6 MS. OLIVER: Becky Oliver, WorldCom.
7 I understand that. But I'm not quite clear yet
8 on -- so you go in within this 24-hour window.
9 This question is trying to get a handle on was
10 there any guideline or plan --

11 MR. WEEKS: We didn't create a
12 frequency distribution. We didn't try some at
13 one hour, try some at two hour, try some at
14 three hours, we didn't plan our work that way.

15 MR. DELLA TORRE: In fact for
16 questions 17, 18 and 19, we will provide you
17 with specific times that we did create as
18 compared to the FOC due date, not as compared
19 to the SOC, which I think is the distinction
20 with this question versus those three that are
21 coming up later. I do have the data to give
22 you the exact times that we did creates in
23 relationship to the FOC due date versus the
24 receipt of the SOC.

25 MS. OLIVER: Okay.

1 MR. DELLA TORRE: Question 9.
2 "Provide clarification about the 17:59 Mountain
3 Daylight Time that causes the Maintain Trouble
4 Report screen to show a different date/time for
5 when the TR was created. Specifically, does
6 the Maintain Trouble Report screen show that
7 the TR was accepted by Qwest on a day other
8 than the actual submission date just because
9 the CLEC accesses the Maintain Trouble Report
10 screen after 17:59?"

11 The answer is no. The time is
12 submitted correctly, but because CLEC uses
13 Greenwich mean time, which is six hours ahead
14 of Mountain time, the GMT time in CEMR would be
15 for the following day. But if it's converted
16 back to Mountain time, then it would be correct
17 with the line.

18 Question 10. "Do Qwest Helpdesk
19 representatives have the ability to access/view
20 the same TR status information that is
21 available to the CLEC via CEMR?"

22 And that is not part of the scope of
23 this evaluation. We did not evaluate the
24 Helpdesk.

25 Question 11. "Did KPMG make an

1 assessment of the impact to CLECs from the
2 inconsistency of the accessing the trouble
3 ticket number within CEMR's various screens?"

4 The answer is, yes, we did. And as
5 a follow-up, we determined that there was no
6 negative impact to the CLEC.

7 Question 12. "Clarify which Qwest
8 legacy system needs to be updated prior to CEMR
9 reflecting a close/cancel status on a TR."

10 And that would be either LMOS or
11 WFA/C, depending upon which system supports the
12 trouble being closed.

13 Question 13. "Did KPMG's re-test of
14 the issue where CEMR reflected a close/cancel
15 status different from the actual close/cancel
16 time use recently closed/canceled tickets?"

17 The answer is yes.

18 Question 14. "What was the range of
19 the age of the trouble tickets for which
20 trouble history was obtained?"

21 And we did review trouble ticket
22 history reports that were over 30 days old.
23 However, that was not a specific element of our
24 evaluation.

25 Question 15. "What were the

1 statuses of the trouble tickets for which
2 trouble history was obtained?"

3 The answer is closed or closed out,
4 which is essentially the same meaning, is the
5 same meaning.

6 Question 16. "Of the 177 MLT
7 transactions initiated, what percentage of MLTs
8 were initiated on recently migrated services?"

9 The answer is none.

10 Question 17. "At what times within
11 the 24 hours following service order completion
12 were the 35 create resale trouble ticket
13 transactions submitted?"

14 There were 34 submitted between 5:48
15 p.m. and 7:40 p.m. on the date due and one at
16 9:43 a.m. the following day.

17 Question 18 is the same question but
18 for UNE-P trouble tickets.

19 The answer is 34 were submitted
20 between 6 p.m. and 7:26 p.m. of the due date.
21 And two the following day at 11:51 a.m. and
22 2:35 p.m.

23 And then question 19 is the same but
24 for UNE Loops.

25 There were 85 we questioned here and

1 all 85 were created between 6:01 p.m. and 7:29
2 p.m. on the due date.

3 MS. OLIVER: Becky Oliver, WorldCom.
4 Can I go back to question 16?

5 MR. DELLA TORRE: Sure.

6 MS. OLIVER: Was that just a matter
7 of happenstance or was that purposeful that
8 MLTs weren't run on any recently-migrated
9 services?

10 MR. DELLA TORRE: That's because
11 these were not -- we did the MLT tests on test
12 bed orders and we were not performing
13 migrations on them, test bed accounts rather.
14 So there was no migration preceding the MLT.

15 MR. WEEKS: There was a section of
16 the test bed that was provisioned specifically
17 to support testing of CEMR. So we had an
18 account sitting out there that the test object
19 was CEMR's feature functionality, would CEMR
20 work, yes or no. So we did not take any of the
21 orders that were out, sitting over for the rest
22 of the tests, transaction tests, Test 12, Test
23 14 and try to manipulate those in this case.

24 MR. DELLA TORRE: Unlike the DUF
25 test or the billing test where there was

1 ordering activity conducted prior to the
2 billing activity.

3 Question 20. "Are Qwest retail
4 trouble tickets entered via Control and RCE
5 created/processed by WFA/C and LMOS as are CLEC
6 trouble tickets?"

7 The answer is yes. The trouble
8 tickets flow to either WFA/C or LMOS
9 appropriately.

10 Question 21. "In what way(s) do
11 Qwest back-end trouble ticket handling systems
12 differentiate between Qwest retail trouble
13 tickets and CLEC trouble tickets?"

14 The answer is that both LMOS and
15 WFA/C used for retail is the same as used by
16 CLECs.

17 The systems don't differentiate in
18 their handling of the troubles, however, of
19 course, CLECs are restricted to transactions on
20 their own circuits, whereas retail does have
21 global access.

22 Question 22. "Verify that the Phase
23 3 evaluations of trouble ticket transactions
24 were completed following changes made by Qwest
25 during Phase 2."

1 And that is correct. Phase 3
2 evaluations of trouble tickets were completed
3 after Phase 1 and 2.

4 MS. OLIVER: Becky Oliver, WorldCom.
5 I just wanted to follow up on the back to
6 question 16 to make sure I am clear. So I
7 understood that you didn't say that there were
8 test bed accounts set up specifically for the
9 CEMR functional evaluation and none of those
10 then were -- would have simulated a CLEC having
11 just migrated a retail customer?

12 MR. WEEKS: Well, yes, we did do
13 those. But specifically with the MLT test
14 itself we didn't target MLT testing as any of
15 those specific accounts or those specific
16 orders.

17 MS. OLIVER: And the reason for that
18 was?

19 MR. WEEKS: As we sit, there was no
20 reason, it just happened that way.

21 MS. OLIVER: Okay. That's what I
22 was trying to get to.

23 MR. DELLA TORRE: Okay. We'll do
24 the Washington State questions.

25 MR. WEEKS: On CEMR, this functional

1 evaluation did not target itself, per se, on
2 any particular state or even any particular
3 region. So there aren't any results in any of
4 our result tables that are broken down that
5 way. It's basically the system that is used
6 across the board.

7 On the question of sort of Os and Es
8 and not Sats and all that, most of the
9 evaluation criteria are satisfied except for
10 turning the page here, 16-3-5, which was an
11 attempt to modify trouble reports. And what
12 we're trying to do is see whether or not during
13 that test the modified transactions took place
14 on a timely basis.

15 And there were benchmarks that had
16 been established that are in the comment,
17 section 4-16-3-5. Qwest failed to meet those
18 in all cases -- probably didn't say that
19 right -- did not meet the standard in all of
20 the cases. And we wrote exception 3107.

21 Qwest attempted to go back with some
22 of their own internal testing and see if they
23 could replicate or duplicate the situation,
24 found different results than we found and
25 decided not to conduct a volume retest simply

1 to try to determine whether or not they could
2 improve on their performance here and chose to
3 take the closed unresolved rather than do any
4 further additional testing. So at this point
5 there is really nothing else as testers that we
6 can do. The results stand as they stand, they
7 speak for themselves. And that's really the
8 only not satisfied situation at this point. I
9 don't know if Qwest wants to comment any
10 further on sort of their thinking or their
11 reasoning behind this.

12 Scott or anybody else want to make
13 any further comments?

14 MR. SIMANSON: No.

15 MR. WEEKS: So that's kind of where
16 we are on this report. So pretty much this
17 test is what it is. We don't expect, other
18 than a few maybe word submitting sort of
19 clarifying things that have come out of these
20 conversations, we don't expect that the results
21 that you'll see in the final report on this
22 Test 16 will be any different than what we see
23 now. Tom?

24 MR. SPINKS: Tom Spinks, Washington.
25 Did KPMG conclude that these results had no

1 significant impact on the tests?

2 MR. DELLA TORRE: For that one
3 particular exception that was closed
4 unresolved?

5 MR. WEEKS: We gave it a non
6 satisfied.

7 MR. SPINKS: The benchmark was 24
8 and it might have been 30 or 33 seconds. One
9 of the parts of that opening question was
10 whether in your opinion that closed/unresolved
11 had any material effect.

12 MR. WEEKS: Well, it clearly had a
13 material effect on the report in the sense that
14 failure to meet those standards as across the
15 board -- in the test if you don't meet the
16 standard or you don't meet the benchmark or
17 you're not at parity by definition, by test
18 design, by agreement before we even issued our
19 first transaction or did anything else results
20 in a not satisfied report.

21 So the mere fact that they didn't
22 meet the standard that had been established by
23 the TAG locked them into a not set.

24 MR. SPINKS: Does that have a
25 material effect on flexibility to provide

1 services to parity?

2 MR. WEEKS: I think that's why you
3 guys are the regulators and we're the testers.
4 What our job was was to tell you what we saw
5 and you get to decide whether you think that's
6 a problem. And I'm sure both Qwest and the
7 other parties to the proceedings that you're
8 going to have in each of your states are going
9 to try to make the case that it does or doesn't
10 make any difference. You know, you can weigh
11 that on your own.

12 MR. DELLA TORRE: Okay. AT&T
13 question number 1. "Please confirm that the
14 access provided to wholesale users Qwest's
15 legacy M&R systems is mediated access?"

16 And before we attempt to construct
17 our answer, I would ask John or Tim if you can
18 clarify your meaning of mediated access.

19 MR. CONNOLLY: We asked the question
20 about the range of access that is available to
21 your CEMR because the first sentence ends in
22 2.1, sorry, the second sentence in 2.1 says:

23 The system which is CEMR provides
24 the wholesale community with access to Qwest's
25 legacy M&R systems that serve both wholesale

1 and retail operations.

2 We understand that CEMR provides
3 some access but not complete access and that
4 the access is through systems that Qwest
5 controls that limits that access to various
6 functions, databases and the legacy systems.

7 MR. DELLA TORRE: The mediation of
8 the interface, in this case CEMR, that we are
9 aware of and would expect are security-based
10 mediation, where a CLEC would have access only
11 to those circuits that they own or lease. As
12 opposed to Qwest would certainly have global or
13 universal access. However, in terms of
14 functionality, that actually was what we did in
15 this entire test is to assess whether or not
16 CEMR provided functionality across the various
17 types of transactions by creates, modifies and
18 the like.

19 MR. WEEKS: If you take a broad
20 definition of mediation, there is an
21 intelligence built into that interface that
22 helps take the information from a CLEC and
23 discover what routing to do in terms of do I
24 put it to LMOS, do I put it to WFA, where do I
25 put it? Those are aspects of mediation of kind

1 of the guiding to the request to the right back
2 of the system.

3 So for what you're trying to
4 distinguish here is do CLECs have direct
5 access, do they touch the same systems that the
6 retail people do? No. They don't they have to
7 go through this interface that grants them an
8 access is the way we tried to describe it here.
9 If that's what you meant by mediated, the
10 answer is yes.

11 MR. CONNOLLY: That's what is meant
12 by mediated.

13 MR. WEEKS: Okay.

14 MR. DELLA TORRE: Question 2. KPMG
15 Consulting reports: "'Generally, high capacity
16 circuits which receive a shorter repair
17 interval.'" Question: "Is this an interval
18 that is shorter than typically provided for
19 repairs of all other products and services?"

20 The answer is generally yes. It
21 could be higher than some but shorter than some
22 based on things like circuit capacity, special
23 conditions, special customers, such as police
24 or emergency conditions. So there are other
25 factors.

1 The follow-up question: "Is the
2 interval that is received on the basis of
3 commitment to resolve the repair?"

4 The answer is no. It is the
5 anticipated restoration, not the commitment.

6 MR. CONNOLLY: Tim Connolly. But
7 the date, the expected closure date, as Scott
8 said earlier, is a condition on type of
9 service, type of product, type of service?

10 MR. DELLA TORRE: Correct.

11 MR. CONNOLLY: So what would be the
12 commitment date or, as is recorded here, the
13 objective date and time is what is expected to
14 happen.

15 MR. WEEKS: At the time the order is
16 entered.

17 MR. CONNOLLY: At the time the
18 trouble ticket is recorded?

19 MR. DELLA TORRE: That's correct.

20 MR. CONNOLLY: It has nothing to do
21 with experience of what will happen with that
22 in terms of what do they make that date?

23 MR. WEEKS: Right.

24 MR. CONNOLLY: Is trouble cleared by
25 such --

1 MR. WEEKS: Right. It's attempting
2 to give the person entering the ticket a best
3 guess as to when the problem will be resolved
4 but it's not a commitment on the company's part
5 in an absolute sense.

6 MR. SIMANSON: It is a commitment in
7 the sense that if repairs take longer than
8 committed to we actually refund dollars back to
9 customer based on state mandates, so it is a
10 commitment. And do we make every one of them?
11 No, but it is a commitment and our failure to
12 meet that results in rebates in many states.

13 MR. WEEKS: We'll defer to Qwest on
14 that. It was our impression it was more of an
15 estimate and Qwest is representing here that
16 they believe it's a commitment.

17 MR. CONNOLLY: In terms of your test
18 report it's on the basis of commitment, and not
19 on the basis of your test results, where you
20 say high capacity circuits receive a shorter
21 repair --

22 MR. WEEKS: Oh, this is not a
23 finding, this is a statement of what we had
24 represented to us by Qwest in terms of how they
25 handle these types of services.

1 MR. CONNOLLY: Great, thanks.

2 MR. WEEKS: I understand your
3 question.

4 MR. DELLA TORRE: Question 3.
5 "Footnote 79" states "'Objective date and time
6 refer to the field names in WFA in which the
7 expected repair time is entered. As stated, an
8 objective date and time is similar to an
9 appointment.'"

10 "What documentation establishes this
11 statement?"

12 And this is not taken from any
13 specific document. And in fact, we are going
14 to revise the footnote that we think this is
15 coming from in the final report to make it much
16 clearer.

17 Question 4. "Are the CEMR services
18 equivalent to functions in the context of this
19 section?"

20 And they are not. Services are pre
21 validation, design services, non-design
22 services. Whereas functions are things like
23 creates, modifies, cancels and closes.

24 MR. CONNOLLY: The pre-validation
25 service seems to be more functionally related

1 than design items type services. Would you
2 agree with that?

3 As I read the bullet points under
4 that pre-validation services bullet, they seem
5 to be describing things that you can do.

6 And so the use of services there
7 seems to be different from the use of services
8 in terms of design management.

9 MR. DELLA TORRE: You are correct.

10 Question 5. "Which Qwest databases
11 are accessed to perform service address
12 validation?"

13 And this is not in the scope of this
14 particular test. We believe that that is done
15 by premise. However, we would defer that
16 question to Qwest.

17 MR. SIMANSON: Scott Simanson with
18 Qwest. Yes, that's correct.

19 MR. DELLA TORRE: Its premise.
20 Question 6. "For designed services can CLECs
21 access 'View TR History' on the basis of a
22 telephone number and a circuit number/ID?"

23 The answer is no; only the circuit
24 number ID is used.

25 MR. CONNOLLY: Excuse me, what about

1 for ISDN services, which I presume are design
2 services? Maybe I'm wrong in that regard.

3 MR. DELLA TORRE: Yeah, ISDN was not
4 part of our evaluation so we do not know.

5 MR. CONNOLLY: Does Qwest know?

6 MR. DELLA TORRE: For non-design
7 services --

8 MR. WEEKS: ISDN, can you
9 retrieve -- do you trouble ticket entries by TN
10 as opposed to circuit load.

11 MS. PATTERSON: Debbie Patterson,
12 Qwest. For circuit, it's a design services
13 circuit. You either have a circuit ID or a
14 telephone number depending on what type of
15 circuit it is, so if the service is identified
16 under telephone number, you can get the TR in
17 that manner. If it is identified under a
18 circuit ID, which is an alpha-numeric character
19 in the ID, then you can retrieve it that way.

20 MR. SIMANSON: A lot of that, Tim,
21 is driven whether it's a PRI, PRIS because they
22 have two different flows.

23 MR. DELLA TORRE: Question 7 is for
24 non-design services, whether or not you can
25 pull a telephone number or a circuit ID and

1 it's our understanding it is telephone number
2 for non design.

3 MR. CONNOLLY: What brought that
4 question, Joe, is the bullet point that I
5 believe is 6.1 that says that TR history
6 requires a circuit number. It was our
7 understanding that those were TN-based
8 accesses.

9 MR. DELLA TORRE: We'll check that
10 in the report and advise appropriately.

11 Question 8. "What meaning had KPMG
12 Consulting attached to post provisioning for
13 purposes of this section?"

14 And this is similar to what we
15 discussed before; it's after the provisioning
16 was completed. And specifically as we had
17 discussed earlier in some of the other
18 discussions, it is the FOC due date.

19 MR. WEEKS: That we used.

20 MR. DELLA TORRE: That we used. And
21 whether or not they hit that date would have
22 been the Qwest -- a Qwest problem because we
23 proceeded based on the FOC due date.

24 MR. CONNOLLY: Plus anything or not
25 a date?

1 MR. DELLA TORRE: Within 24 hours of
2 the FOC due date we then attempted to initiate
3 trouble tickets.

4 MR. WEEKS: In fact, we started --
5 as the information we read earlier to one of
6 the WorldCom's questions if you'll notice those
7 time stamps, we were running the attempt to
8 turn in the trouble ticket the night of the day
9 that the FOC said that it was to complete. So
10 if it said March 3rd, then March 3rd at 6
11 o'clock we're cranking trouble reports.

12 MR. DELLA TORRE: Which were the
13 dates and times that we gave to WorldCom
14 questions earlier.

15 MR. SIMANSON: We want to thank you
16 for that.

17 MR. WEEKS: You're welcome. So it
18 could have been less than 24 hours, it could
19 have been less than an hour in theory.

20 MR. CONNOLLY: Would it be your
21 understanding that the order --

22 MR. WEEKS: TR or order?

23 MR. CONNOLLY: The order that
24 provisioned the line for this circuit. That
25 order has to be complete before a trouble

1 ticket can be entered on that line/circuit?

2 MR. DELLA TORRE: Yes. And in fact
3 if ultimately it turned out that the FOC due
4 date was not the date that the order was
5 actually completed, those were removed from
6 this because you're correct, if the
7 provisioning wasn't actually completed, then we
8 wouldn't have been able to enter a trouble
9 ticket.

10 We also removed orders that
11 completed prior to the FOC due date because we
12 wanted to catch the 24-hour ownership issue.
13 So if orders completed earlier than the FOC due
14 date or later than the FOC due date by 24 hours
15 in either direction, those were removed from
16 this evaluation. So we used the FOC due date
17 to establish the date that we would attempt to
18 create trouble tickets or to enter trouble
19 reports.

20 If later we determined that in fact
21 the provisioning work was completed 24 hours
22 earlier than the FOC due date, or less, 24
23 hours later than the FOC due date or more,
24 those were not used as part of this evaluation.

25 MR. CONNOLLY: Is there a period of

1 time from when the order is completed, that
2 line has been put in service and completion is
3 registered in WFA, is there a period of time
4 that the trouble ticket cannot be issued
5 against that line?

6 MR. WEEKS: I think the answer is
7 not that we're aware of.

8 MR. DELLA TORRE: Correct.

9 MR. WEEKS: In fact we saw that you
10 could actually put in trouble tickets before
11 the completion of the order and they were
12 sitting out there in a provisional status, so
13 to speak. If they were out there they would go
14 ahead and let you mechanically turn in a
15 trouble ticket and have it recorded even before
16 the order had actually finished its total
17 provisioning cycle.

18 MR. DELLA TORRE: Let me follow up
19 on that question, though. We were looking at
20 the FOC due date. So for the majority of the
21 cases where the provisioning work actually did
22 complete on the FOC due date. So those two
23 were the same day. We initiated our trouble
24 ticket creations at 6 o'clock, 6:30, 7 o'clock
25 that evening. In some cases, and we don't

1 know, the provisioning work could have been
2 completed at 8 in the morning, at noon, at 5
3 p.m. So there could have been as little as an
4 hour or there could have been eight hours
5 between the actual completion of the
6 provisioning and our creation of trouble
7 tickets. Because we were using a date, not a
8 time, for the actual completion of the
9 provisioning work.

10 MR. CONNOLLY: So on those cases or
11 occasions where when you are able to issue a
12 trouble ticket, see it floating out there,
13 those would have been orders that completed
14 earlier than you would have expected them to on
15 your FOC basis.

16 MR. DELLA TORRE: Same day, the day
17 that we expected.

18 MR. WEEKS: Because if it was more
19 than 24 hours, and it was subsequently
20 discovered that the order had completed more
21 than 24 hours before a day early, let's say, a
22 day or more early for this test, this
23 particular measure, this evaluation criteria,
24 we threw those out of the sample.

25 MR. DELLA TORRE: For a FOC due date

1 of May 1st, May 1st at 6 p.m. we started trying
2 to put in trouble orders.

3 MR. WEEKS: And were successful in
4 doing so. So it was not the problem we saw in
5 New York where there was a lapse before you
6 could get a trouble.

7 MR. CONNOLLY: I'm also curious
8 about troubles that are detected during the
9 provisioning process particularly for UNE
10 Loops.

11 MR. WEEKS: We don't think of that
12 and I don't think Qwest thinks of that as
13 maintenance and repair. They think of that as
14 provisioning. So if I go to put a loop in, a
15 new loop, I go to put it in and I've got some
16 kind of problem during the provisioning process
17 not M&R, not LMOS, not WFA, that's a
18 provisioning issue that provisioning people
19 work; that's not an M&R problem.

20 MR. SIMANSON: Any time on the due
21 date is considered a provisioning issue.

22 MR. WEEKS: Even though they're
23 issued for repair but they're considered a
24 provisioning issue.

25 MR. FINNEGAN: John Finnegan. If

1 you were able to issue a trouble report on the
2 due date, you can issue it but Qwest makes a
3 distinction that if it's on the due date it's
4 provisioning-related trouble work?

5 MR. SIMANSON: The back-end process
6 is they'll more than likely route that ticket
7 back to the provisioning for process to find
8 out what happened there.

9 MR. FINNEGAN: How about for PID
10 purposes?

11 MR. SIMANSON: What PID purpose?

12 MR. FINNEGAN: Let's say it's a
13 trouble report on the day of installation
14 for -- your workload is going to be routed to
15 the provisioning group. Is it still considered
16 a trouble report for the purposes of the OP-5
17 new service trouble report?

18 MR. SIMANSON: If the ticket was
19 created, yeah.

20 MR. WEEKS: I thought you were
21 asking a different question, John, which is not
22 provisioning is complete, it's the same day and
23 then there's a trouble report put in. I
24 thought you were asking about and I was talking
25 about situations that occur before the circuit

1 is formally turned up and accepted.

2 MR. FINNEGAN: What I'm getting at
3 is there is an exclusion in the PID for many of
4 the maintenance and repair measurements.
5 Trouble reports on the day of installation
6 before the installation work is reported by the
7 technician/installer is complete.

8 MR. WEEKS: That's what I was
9 talking about. So situations where it's
10 officially not turned over to the CLEC yet,
11 it's still owned by Qwest, it's still a work
12 order, it's still a service order, it's still
13 work in progress, that's not considered by
14 Qwest, we wouldn't consider that M&R. We would
15 consider that some sort of difficulty or
16 problem in provisioning which resulted if
17 persisted in not meeting the due date on the
18 order and you get the jeopardy notice or you
19 get a missed date. You miss your LOC date.

20 MR. FINNEGAN: But you were still
21 able to create the trouble ticket?

22 MR. DELLA TORRE: Not if
23 provisioning had not completed.

24 MR. FINNEGAN: Okay. I thought you
25 had said you were doing, you were able to

1 create some trouble tickets before they had
2 completed their --

3 MR. WEEKS: It's my understanding
4 and these guys are going to correct me, I
5 believe it's the case that if you're migrating
6 from retail to wholesale, you can call and
7 submit a trouble ticket and Qwest's systems
8 will recognize that circuit, they'll understand
9 that it's a real circuit and that they will
10 actually allow you to enter that even though
11 you don't officially own that circuit yet.
12 That's our understanding.

13 MR. DELLA TORRE: Right. In a
14 migration situation where it's a preexisting
15 retail customer, they're aware of that circuit.
16 They have the information, they'll allow you to
17 open it but there will be an RSID conflict that
18 you'll get an error message back that says,
19 okay, well, we see that circuit so we will let
20 you open it but you don't own this yet.

21 MR. WEEKS: But in a new you
22 wouldn't see it because it would be caught in
23 this provision, the situation we were talking
24 about earlier.

25 MR. DELLA TORRE: And that would

1 drop the manual handling.

2 MR. WEEKS: Is that clear enough?

3 MR. FINNEGAN: Yes, it's consistent
4 with how I thought it worked, going down a
5 different path and you dragged me back.

6 MR. WEEKS: Okay.

7 MR. DELLA TORRE: Question 9.

8 "Please describe the sampling/selection process
9 used to develop the scenarios used in Phase 1
10 of this test."

11 And we used the MTP table D 5 which
12 provides the list of the conditions to be
13 tested across basic scenarios, and then we
14 correlated that to the Qwest system
15 documentation to find any transactions and we
16 selected and developed scenarios that would
17 meet the requirements for, in the list between
18 those two items, the MTP table 5 and the Qwest
19 system documentation so that we were exercising
20 all of the available functionality.

21 Question 10. "KPMG Consulting's
22 report states: 'KPMG Consulting observed and
23 interviewed the P-CLEC as it opened tickets for
24 newly migrated line (Qwest retail to CLEC)
25 within 24 hours of the service order due date.'

1 ."Were KPMG Consulting's observations
2 within the 24 hours immediately following the
3 service order due date?"

4 I think we have responded -- went
5 through this pretty well.

6 "Did KPMG Consulting make any
7 observations within the 24 hours immediately
8 following?"

9 Again we went over that.

10 Question 11. "KPMG Consulting
11 notes: 'The internal security of CEMR requires
12 ownership validation with the circuit
13 maintenance record before transactions can be
14 performed against a circuit number.'

15 "Please provide the meaning attached
16 to ownership validation in respect to this
17 section."

18 And this is as we mentioned moments
19 ago, the CLEC RSID has to match the log on
20 identity of the company attempting to perform
21 the transaction.

22 MR. CONNOLLY: Except for open
23 trouble ticket.

24 MR. WEEKS: On the migrating in the
25 case where it doesn't match.

1 MR. DELLA TORRE: And you still
2 really -- the transaction will not flow through
3 the way it normally would. It would drop to
4 manual handling to assess why you're trying to
5 get this done without the right RSID.

6 Question 12. "KPMG Consulting
7 states: 'In order to test the functionality of
8 the CEMR system, it was necessary to enter
9 troubles, and in some cases, modify troubles,
10 close troubles, and obtain a history of closed
11 troubles.'

12 "Please confirm that the meaning of
13 troubles for purposes of this paragraph is
14 records and details describing simulated and
15 inserted troubles."

16 And just for clarification, there
17 are three events, if you will, and we're trying
18 to refine the report to capture the following
19 language. It is the actual fault, the problem
20 that exists in the real world, so that is one
21 to follow. The second is the troubled report
22 that we would try to -- that we would create or
23 modify in CEMR. And then the third is the
24 trouble ticket which is actually the internal
25 Qwest acronym or mechanism for tracking that

1 trouble report that was opened by the CLEC.

2 So the three different concepts and
3 we may not have used those three in the most
4 efficient manner so we will make revisions
5 where appropriate.

6 MR. WEEKS: Did we answer your
7 question?

8 MR. CONNOLLY: Yes, thank you.

9 MR. DELLA TORRE: Question 13.

10 "Footnote 85 says 'Alternate method of
11 processing designed to minimize the impact that
12 the third-party testers had on Qwest
13 maintenance workers without distorting or
14 changing basic system functionality.'

15 "Which system(s) basic functionality
16 were worked around by the third-party testers?"

17 And these were modifications to
18 WFA/C and LMOS, not to CEMR, so the way CEMR
19 actually completed its processing of those
20 transactions were not modified.

21 Question 14. "Please explain how
22 the procedures for handling trouble tickets
23 described in the paragraph following are
24 consistent with blindness principles.

25 "KPMG Consulting was instructed by

1 Qwest to use these test methodologies where
2 appropriate. These methodologies did not
3 affect the functional processing of the test
4 scenarios. As a preventative measure, a
5 specific narrative was entered in the comments
6 field so that a Qwest employee who might
7 intercept the report would be able to identify
8 it as a test trouble, and not work on the
9 reported trouble."

10 And this is the same concept as the
11 previous question that we were evaluating CEMR
12 functionality not the folks actually going and
13 doing the work.

14 There were no changes made to CEMR,
15 only in the OSS, to prevent the dispatching and
16 manual intervention.

17 MR. WEEKS: Blindness was an issue
18 of a piece of software.

19 MR. CONNOLLY: The message that the
20 Qwest technician would see under the
21 circumstances of one of these trouble tickets
22 would say this is a test not a real alert?

23 MR. DELLA TORRE: That it was a test
24 trouble and should not be worked.

25 MR. WEEKS: And it actually went to

1 a different work cube than a live trouble
2 ticket would refer to as well. That is part of
3 the WFA that was done.

4 MR. CONNOLLY: So this in concept
5 seems somewhat akin to the --

6 MR. DELLA TORRE: Volume test in
7 order management that don't go through to
8 provisioning.

9 MR. CONNOLLY: Right, and the
10 discussion again earlier about the WFA
11 modifications.

12 MR. WEEKS: The scripts.

13 MR. CONNOLLY: Thank you.

14 MR. WEEKS: Again just to emphasize,
15 because this was a CEMR functional evaluation,
16 we were trying to evaluate whether CEMR, the
17 interface and software had the right features
18 to function that it presented to the CLEC
19 community and we were able to do that without
20 actually having the troubles worked by the
21 folks in the field. That's part of the other
22 M&R end-to-end test. So for purposes of this,
23 we just needed to have a safety net out there
24 so we didn't have people running around as a
25 result of all these troubles that we were

1 turning in to try and test the CEMR's
2 functionality.

3 MR. DELLA TORRE: Question 15.

4 "Based on the known functionality of CEMR, KPMG
5 Consulting developed a checklist for use in
6 observing RSAs as they performed trouble
7 administration activities employing Qwest
8 retail systems.

9 "What is the basis of KPMG
10 Consulting's knowledge of CEMR that was relied
11 upon to develop this checklist?"

12 And it was a review of the CEMR user
13 guide as well as observations made during Phase
14 1 of the evaluation.

15 Question 16. "Please describe the
16 contents of the Phase 2 checklist."

17 The checklist contains the basic
18 functional elements of the CEMR system, i.e.,
19 to create, modify, close, cancel, et cetera.

20 Question 17. "In what sections of
21 the Test 16 report are the documented
22 similarities and differences in M&R functions,
23 (i.e., between retail and CEMR) provided?"

24 We do not present similarities and
25 differences. They are not documented because

1 we didn't find any.

2 MR. FINNEGAN: Didn't find any
3 similarities or didn't find any differences?

4 MR. DELLA TORRE: Thank you very
5 much. That's exactly the point I was just
6 being told from my questioning team.

7 Question 18. "Please describe the
8 results of the detailed comparison of the
9 respective functionality and capabilities
10 between CEMR and retail systems for trouble
11 management."

12 And in fact this is the subject
13 matter of our evaluation criteria 16-2-1
14 through 16-2-7.

15 So those seven consecutive criteria
16 are in fact the evaluation and functionality
17 comparison between CEMR and retail.

18 Question 19. "KPMG Consulting makes
19 several references to normal days and normal
20 hours.

21 "Please describe the meaning KPMG
22 attaches to normal days and normal hours for
23 purposes of this subsection."

24 The normal day is defined as seven
25 hours of normal load conditions and five of

1 peak load conditions. And normal hours defined
2 is the number of transactions submitted by CLEC
3 in a non-peak load condition. So one of the 7
4 hours versus the five peak.

5 Question 20 is regarding table 16-7.
6 "Please provide an explanation of the
7 carrier(s) that are projected to have the
8 volumes of lines in service in August 2002."

9 And we did not base our forecast on
10 projections from carriers.

11 MR. CONNOLLY: The projected lines
12 represent a projection of carrier lines and not
13 Qwest lines?

14 MR. DELLA TORRE: These volumes were
15 projected on data provided by Qwest which
16 includes lines of service from April 2000 to
17 June 2001.

18 MR. WEEKS: Total lines in service.

19 MR. DELLA TORRE: And the troubles
20 reported over that same time period so it's
21 Qwest produced data on lines and troubles
22 versus CLEC provided forecasts.

23 MR. CONNOLLY: I'm trying to figure
24 out whose lines they are.

25 UNIDENTIFIED FEMALE SPEAKER: Qwest

1 lines.

2 MR. WEEKS: All lines. Okay. So
3 it's wholesale lines in that question not
4 retail.

5 MR. DELLA TORRE: Right. Qwest
6 provided data of wholesale lines.

7 Question 21. "Footnote 86 says
8 'KPMG Consulting used Qwest's raw data for
9 lines in service and trouble reports received
10 to calculate the average trouble rate.'

11 "Please describe the processes
12 employed by KPMG Consulting to validate the
13 Qwest data and calculations in respect to this
14 test phase."

15 There was not an independent
16 valuation of the data presented, however, after
17 KPMG developed its test methodology, it was
18 submitted to the raw TAG for approval, which
19 was then subsequently approved.

20 Question 22. "In this subsection
21 KPMG Consulting makes several references to
22 normal days, normal rate and normal hours.

23 "Please describe the meaning KPMG
24 Consulting attaches to normal days, normal rate
25 and normal hours."

1 And I think we just went through
2 this for normal days and normal hours.

3 Normal rate actually is the same as
4 normal hours so we will make a revision to the
5 report.

6 MR. CONNOLLY: So what you're
7 getting at here, what this is about is
8 determining what the volume is over what period
9 of time and then a concentration interval for
10 the peak?

11 MR. DELLA TORRE: Correct.

12 MR. CONNOLLY: For a day --

13 MR. WEEKS: In order to spread the
14 workload across the ticket, a reference.

15 MR. DELLA TORRE: Question 23.

16 "KPMG Consulting advises: KPMG Consulting
17 assumes that in the near future approximately
18 the same percentage of troubles will arrive via
19 CEMR as will arrive the IMA GUI.

20 "Has KPMG Consulting performed
21 studies in the Qwest region and supports its
22 assumption?"

23 The answer is no.

24 Question 24. "KPMG Consulting
25 states: 'CEMR processing required two steps.'

1 "What is the current way in which
2 CEMR processing occurs? Are there more steps
3 now than there were? Is it a one step process
4 now?"

5 The answer is no. It has been,
6 continues to be and our understanding is it
7 will continue to be a two-step process
8 certainly in the way we were explaining how the
9 process worked.

10 MR. WEEKS: I want to make sure
11 we're not passing each other here by what we
12 mean when we say steps. It's like to submit
13 the information, enter the information and get
14 a response back from the company looking at
15 that response, that's what we mean by a
16 two-step process, as opposed to maybe what we
17 inadvertently communicated that you have to go
18 through two steps to do the submission, that's
19 not what we're saying.

20 MR. DELLA TORRE: It's actually
21 crossed to the CEMR process sends to the
22 back-end is one and then receives from the
23 back-end is two.

24 MR. CONNOLLY: Thanks for that
25 clarification because I had the alternate.

1 MR. WEEKS: That's why I clarified
2 it.

3 MR. DELLA TORRE: It's not the front
4 end, it's the middle.

5 Question 25. "What is the bandwidth
6 of the connection between steps T3 and T4 and
7 between T5 and T6?"

8 And this is referencing figure 16-2.
9 And we do not know the answer to that question.
10 We would defer that to Qwest if they would be
11 able to provide any additional insight to the
12 bandwidth of those connections.

13 MS. PATTERSON: We don't know.

14 MR. CONNOLLY: Do we know who knows?

15 MR. DELLA TORRE: Just for the
16 record, there is a question by AT&T to Qwest if
17 they could retrieve the information on the
18 bandwidth of these particular connections and
19 Qwest is representing that they will attempt to
20 get that information.

21 MR. CONNOLLY: It's AT&T question
22 number 25 for Test 16.

23 MR. DELLA TORRE: Question 26. The
24 "Subsection heading should be renumbered to
25 2.4.3.4."

1 And that is duly noted and will be
2 changed.

3 MR. FINNEGAN: Can I interrupt for a
4 second before we move on to section 3.1? In
5 the April 26 version of the draft final report
6 on page 321 and section 2.5.3, the last
7 sentence states: KPMG Consulting performed a
8 permutation test on the timeliness criteria
9 using the benchmarks identified in section
10 2.4.2.4. I don't recall a discussion ever
11 being had on applying statistical testing to
12 benchmarks.

13 Generally benchmarks were stair and
14 compare.

15 MR. DELLA TORRE: One clarification
16 I can make immediately, these were not PID
17 benchmarks, these were benchmarks that we
18 determined through an independent exercise so
19 it's possibly a poor use of the word benchmark.

20 MR. FINNEGAN: Even with that
21 clarification, in the documentation that I can
22 review, the latest being a November 11th of
23 2001 document on the test methodology, there
24 was no mention of statistical testing being
25 applied to the benchmarks, if you want to call

1 them that.

2 MR. WEEKS: I think the distinction
3 we're trying to make here and not doing it
4 successfully is that we needed to establish a
5 standard that we were going to use for
6 determining what an acceptable response time
7 would be. And it is in analyzing the data that
8 we used, not a Qwest performance.

9 This is in the test design phase
10 before we had ever even sent our first trouble
11 report, trying to go through a test, if you
12 will, a little mini simulation and trying to
13 establish the benchmark of what did it look
14 like a reasonable response time would be. It
15 is in analyzing that data that we did the
16 permutation test, not on evaluating Qwest
17 results thereafter to determine if they were in
18 compliance with the bench data.

19 MR. DELLA TORRE: And if I recall,
20 let me follow up briefly. I don't have the
21 exact language and it's not in front of me.
22 What I think that the approach document that we
23 published for the PID does indicate that we
24 would use statistical testing. And I think
25 there is a mention of standard deviation and

1 whatnot. I think that's in there.

2 MR. FINNEGAN: There is, the
3 recommended M&R transaction volumes and
4 methodology. This is the 11/13/2001 document
5 that I'm referencing. There is a statement in
6 there that in determining the benchmarks, data
7 will be captured and KPMG Consulting will
8 analyze the time-stamped data calculating
9 averages, standard deviations and the like.

10 There is also reference to what the
11 benchmark values would be. And what I'm
12 missing is the success criteria that says
13 success of Test 16 will be determined when, in
14 essence, Qwest passes permutation tests against
15 these cross tests; that's a gap I'm missing. I
16 understand how the possible benchmarks were
17 achieved and I recall those discussions.

18 What I don't recall is the next
19 step, so to speak, where it was decided the
20 benchmarks would not be stair and compare but
21 there would be a permutation test and
22 statistical tests applied against those
23 benchmarks for the purposes of Test 16.

24 MR. WEEKS: Historically we have
25 done as you have represented which is in other

1 tests we've always used permutation tests when
2 we establish the standard. You're correct it
3 may not have been explicit that when we were
4 not in PID land, because you're right, in PID
5 land we agreed for PID benchmarks it would be
6 stair and compare. And we agreed for parity we
7 would use the dual tests. I think we were
8 probably always silent and never explicit on
9 the circumstances when we established the
10 standard, as opposed to the standards by the
11 PID that we would use permutation method, that
12 probably wasn't explicit and we've always done
13 that.

14 MR. FINNEGAN: Well, that may be the
15 case, but in that same document further down,
16 there is a statement: Benchmarks and standards
17 will be finalized by the parties using
18 customary rock/TAG collaboration.

19 MR. WEEKS: That the values would be
20 established.

21 MR. DELLA TORRE: Correct.

22 MR. FINNEGAN: Well, benchmarks and
23 standards if it says benchmark/standards.

24 MR. WEEKS: The way we use the
25 phrase benchmark and standards that's the

1 yardstick, that's the 95 percent, the two
2 seconds, the whatever. That's when we use the
3 phrase benchmark or standard that's what we
4 mean. Not the evaluation technique that we're
5 going to use to look at the performance.

6 MR. FINNEGAN: But even then there
7 may be some inconsistencies. In Test 19 there
8 is a benchmark of 95 percent of a completeness
9 of the DUF records. To my knowledge, there was
10 no permutation test applied with that KPMG
11 defined benchmark outside of PID line.

12 MR. WEEKS: I would have to go look
13 and see what their scroll is.

14 MR. DELLA TORRE: Typically if the
15 results are very close for a standard that we
16 have established, we will use statistical
17 analysis to determine if in fact there are
18 material differences between the results that
19 we've achieved and the standard that we've
20 established. That is consistent with all of
21 the other test areas.

22 MR. FINNEGAN: There may be some
23 exceptions. One of the DUF exceptions I can
24 recall where the benchmark was 95 percent and
25 the result was exactly at 95 percent and that

1 resulted in additional retests. If the
2 permutation test is applied, the critical value
3 in that case would be something higher than 95
4 percent.

5 MR. WEEKS: John, it is what it is.
6 Allen was just telling me what we've always
7 done where we established the standard,
8 benchmark, whatever you want to label that,
9 where it wasn't articulated by the PID. If it
10 was a percentage, we used binomial, and if it
11 is an average, then we use permutation tests.
12 It's just the way we've always done it; it's
13 the way we did it here. If that's not your
14 understanding of how the test would be done, I
15 apologize, but that is what it is.

16 MR. DELLA TORRE: I'm speculating on
17 the DUF example which you gave; however, there
18 are conditions, given the point in the test,
19 because there are -- in certain circumstances
20 we will not have completed the entire
21 evaluation yet, but we will raise exceptions
22 even if it's a close call, if you will, because
23 we aren't there yet and if we see a trend or a
24 pattern and it looks like that doesn't conform
25 to our expectations we will issue exceptions,

1 but at the conclusion when we're looking at
2 aggregate results, we will apply testing as
3 Mike just defined.

4 MR. FINNEGAN: What alpha did you
5 apply to the permutation test?

6 MR. WEEKS: Five percent.

7 MR. DELLA TORRE: Question 27, and I
8 think we may have addressed this earlier in
9 WorldCom's question. This is the time zone
10 issue between Greenwich mean time and Mountain
11 time and whether or not something reported on
12 the edge looks like it's a different day. But
13 in fact now is now, there and here.

14 MR. WEEKS: It is what it is.

15 MR. DELLA TORRE: Question 28 --
16 sorry.

17 MR. CONNOLLY: Excuse me, Joe, there
18 is a specific question on "What is the trouble
19 ticket create date for trouble reports
20 requested after 17:59 MDT?"

21 MR. WEEKS: The actual GMT time, the
22 time you enter is the time that is logged into
23 the system.

24 MR. DELLA TORRE: So it's the next
25 day in Greenwich mean time.

1 MR. CONNOLLY: Great, thanks. Now I
2 understand.

3 MR. DELLA TORRE: Which is still
4 now. Question 28. "KPMG Consulting reports:
5 'The Qwest representatives who answered the
6 calls did not appear to have the knowledge
7 about the CEMR application or the technological
8 capability to resolve the problem in a timely
9 manner.'

10 "What types of technology were not
11 available to the Qwest representatives? What
12 technologies are typically used and what
13 prevented them from being available?"

14 We are going to amend the report.
15 This was an overzealous representation
16 expressed in the observation, or exception. It
17 was an observation that was just taken verbatim
18 and replicated into the draft final report.

19 We had no way of identifying the
20 technology available to these folks. All we
21 know is that the answers we received were not
22 the answers we expected. And that's really the
23 point of the exception. And that's the point
24 of this -- and we just reiterated that
25 exception and its findings in the draft final.

1 So we will amend the report to be more
2 consistent with what our actual findings were.

3 Question 29. "Please explain the
4 possible ways in which to track trouble ticket
5 system transactions other than the trouble
6 ticket number."

7 The answer is the trouble ticket
8 number generated with the create transaction
9 can be used to track the status of open trouble
10 reports in LMOS. Once they're closed, the
11 telephone number must be used. Transactions
12 such as MLT testing or history of requests use
13 only the telephone number and are not
14 associated with the trouble ticket. Once
15 they're closed you need to use the TN.

16 MR. WEEKS: The history is that
17 trouble begins the particular circuit so, once
18 it's opened, the focus is on fixing that
19 problem. Once that problem sort of goes away,
20 gets resolved, then the only way to really get
21 back at that particular trouble is to
22 understand what circuit was the subject of the
23 trouble and then you can look off by that TN
24 all the troubles that have taken place. So
25 history is a circuit concept, not a trouble

1 concept.

2 MR. DELLA TORRE: Question 30.

3 "Please clarify the modification(s) made to
4 CEMR to 'instruct the application to wait to
5 update the status of the trouble ticket.'"

6 And to follow on "What instructions
7 does CEMR provide to which application(s)?"

8 And while we know what the
9 modifications were intended to do, and we also
10 can verify that they were between CEMR and
11 WFA/C and CEMR and LMOS, we do not know what
12 the specific modifications were.

13 MR. CONNOLLY: Would Qwest have
14 insight to provide an answer to AT&T's question
15 30 about take-back basis?

16 MS. PATTERSON: This is Debbie
17 Patterson. What I do know about that is it's a
18 synchronization tool. I don't know if that is
19 a good enough answer that you're looking for,
20 but it is an immediate ticket status, so it
21 updates the ticket statuses from the legacy
22 system back into CEMR.

23 MS. DONALDSON: Tim, I wonder if the
24 question is reversed?

25 MR. DELLA TORRE: Jackie, you need

1 to use the --

2 MS. DONALDSON: This is Jackie
3 Donaldson with Qwest. Tim, I think the
4 question might be reversed, that in fact it's
5 the update back to CEMR that was upsync'd. So
6 as I read the question, is not CEMR providing
7 instruction to the downstream application, it's
8 getting the CEMR in sync with the downstream
9 application.

10 MR. CONNOLLY: Reading from test
11 cross-reference 16-4 KPMG's comment says in
12 part: To prevent further occurrences of this
13 inconsistency Qwest modified CEMR to instruct
14 the application to wait to update the status of
15 the trouble ticket until it receives
16 notification of successful ticket closure from
17 the legacy systems.

18 MR. DELLA TORRE: The CEMR
19 application.

20 MR. WEEKS: I think both things are
21 true. I think the active part of this was the
22 tool that was just described by Debbie, but
23 then reading from this note, we were under the
24 impression CEMR also had to have an updated
25 capability to disable, to not update itself the

1 status information which it had been doing, but
2 instead to bypass that updating of the field
3 and have that field updated.

4 MR. CONNOLLY: Great. Thanks. No
5 need to for the same thing.

6 MR. DELLA TORRE: Question 31.
7 "What response time did KPMG Consulting
8 establish as a benchmark for receiving expected
9 responses from CEMR?"

10 And the cross-reference is to
11 16-3-1.

12 And that is not a timeliness
13 criteria but rather receipt of response.

14 MR. WEEKS: The existence of a
15 response, did we receive one, yes or no.

16 MR. CONNOLLY: So it's just that
17 binary sort of I have it or don't have it?

18 MR. DELLA TORRE: Yes.

19 MR. WEEKS: Yes.

20 MR. CONNOLLY: When did you start
21 looking for it?

22 MR. WEEKS: Well, mechanically as
23 soon as we sent it. Are you asking is there a
24 standard interval or something that we had been
25 led to believe there was for response time or

1 something?

2 MR. CONNOLLY: Well, it just seems
3 since you were going to look for a response.

4 MR. WEEKS: Yes.

5 MR. CONNOLLY: Would it be an
6 immediate response you're looking for? Is it
7 next day turn-around? Before you can decide
8 you don't have one you have to decide the
9 timing --

10 MR. DELLA TORRE: We have the
11 benchmark values that were established that are
12 in Table 16-18 so there is a separate sort of
13 timeliness evaluation. It's just that this
14 particular criterion is just often did we get
15 what we were supposed to get. There are
16 another set of the benchmark values in Table
17 16-18.

18 MR. WEEKS: So the timeliness
19 criterion is which one? I think if you'll
20 look, for example, at 5.

21 MR. DELLA TORRE: 16-3-5.

22 MR. WEEKS: Is just an example of
23 where we applied the benchmark to a particular;
24 it was in this case a mod. So if you look at
25 3-5, which is a modified 3-6 which is a

1 close/cancel, 7, there are a number of ones
2 where we applied the benchmarks we had
3 previously established to get at what I think
4 you're getting at which is, where did you worry
5 about timeliness.

6 MR. DELLA TORRE: There are several
7 different high levels and in fact you'll see
8 the same thing tomorrow in the order management
9 as well where we're looking for just the
10 receipt of the response, the timeliness of the
11 response, the ability to transact that response
12 or functionality and the accuracy of
13 completeness of a response as sort of generic
14 areas, if you will, that we look for in the
15 submission and response life cycle.

16 So this particular criteria that
17 you're referencing is simply receipt of
18 expected response.

19 MR. CONNOLLY: Okay. Thanks.

20 MR. DELLA TORRE: Question 32. "Did
21 KPMG Consulting establish a time-out threshold
22 for CEMR responses?"

23 And the answer is no.

24 Question 33. "What steps did KPMG
25 Consulting undertake to validate the content of

1 the CEMR responses in this test phase?"

2 And our content validation was
3 limited to the correlation of the reference or
4 identification fields. For example, a ticket
5 ID or a circuit ID.

6 Question 34. "What meaning is
7 attached to 'successful response' for purposes
8 of this Test Cross Reference?"

9 And the successful response is that
10 CEMR returns a response as defined by the CEMR
11 user guide. Based on the transaction or the
12 ticket that we initiated in create or modify,
13 et cetera, the CEMR user guide laid out what
14 the appropriate response would be. The
15 successful response is if in fact that was the
16 response received.

17 Question 35. "Provide a definition
18 and description of the, quote, scouting
19 activities conducted by the P-CLEC" -- oh,
20 yeah, I'm sorry, my apologies, I moved forward
21 before really thinking about it. This was the
22 following, one, two, three, questions were
23 actually referred to HPC that HPC referenced to
24 us as being more appropriate for us to answer.
25 So I will give you more detailed references to

1 where these belong and where they come from.

2 Sorry, I just was reading aggressively.

3 So HP's report 12-B, which is the
4 CEMR helpdesk and maybe we would be better off
5 doing this in your section. We had originally
6 intended to give these answers to these three
7 questions today because the personnel on our
8 team that are appropriate are here now, as
9 opposed to tomorrow during PHC's section where
10 these folks may or may not be available.

11 However, I would be happy to do them both now
12 and then so if you don't feel like tracking and
13 figuring out where they belong, we will address
14 them again tomorrow. But just in case anyone
15 can figure out why they belong here you can ask
16 some questions now since we have our personnel
17 here. Let me just read off the questions and
18 go over this and we'll address this again
19 tomorrow.

20 The following three questions were
21 referenced to HPC and then ultimately
22 re-referenced to us. The first one was
23 "Provide a definition and description of the
24 'scouting activities' conducted by the P-CLEC."

25 And this is a practice that we have

1 put into place for testing where we will submit
2 a small number of the intended transactions to
3 verify that in fact our orders or our tickets
4 are well formed and that we're receiving the
5 responses that we expect before the actual test
6 is performed. It's sort of a Q/A test, if you
7 will, for ourselves internally.

8 MR. CONNOLLY: I want to help people
9 find this question. This was in our set of
10 Test 12-B, number 10, which was that question.

11 MR. DELLA TORRE: Thank you. The
12 next one was 12-B, 6, question number 6 from
13 WorldCom. And again, we'll go through this
14 again tomorrow. So don't fret.

15 "When a Qwest representative
16 verifies CLEC ownership of a line for a
17 manually submitted trouble ticket, is Qwest
18 able to identify instances where the line
19 recently migrated to the CLEC, (SOC has been
20 issued but the order has not completely
21 processed through Qwest's back-end systems)?"

22 Okay. We didn't -- KPMG Consulting
23 did not evaluate this circumstance and let me
24 restate it.

25 When a Qwest representative verifies

1 CLEC ownership of a line for a manually
2 submitted trouble ticket, is Qwest able to
3 identify instances where the line recently
4 migrated to the CLEC?

5 And we do not know the answer to
6 that question. We did not validate that.

7 And the final one is also from
8 WorldCom 12-B, question number 7, "When a Qwest
9 representative assigns a trouble ticket number
10 and an appointment time for the completion of
11 repairs from manually submitted trouble
12 tickets, does the appointment time reflect the
13 same commitment time that would have been
14 returned if the trouble ticket had been
15 electronically submitted?"

16 Okay. We did not test this. We did
17 not submit two tickets manually at the same
18 time to try and create this condition. So this
19 was not specifically tested.

20 And as a follow-up to that, the
21 commitment time is system generated for both
22 CEMR and manually-generated troubles.

23 We did observe out of the system
24 generated commitment time was provided to the
25 callers.

1 Other questions on Test 16? I have
2 Becky Oliver from WorldCom.

3 MS. OLIVER: Becky Oliver, WorldCom.
4 I wanted to go back to WorldCom questions 6 and
5 7 and see if maybe Qwest would be able to
6 address them. And just to recap, question 6 is
7 asking at what point after an order completes
8 for a newly-migrated service will a trouble
9 ticket that is submitted via CEMR and created
10 in LMOS flow automatically through the systems,
11 instead of this time period which I assume is
12 before the RSID is updated and this time period
13 where the trouble ticket would be routed to a
14 Qwest representative. I'm looking for what is
15 that cut-off time? Does that make sense?

16 MS. PATTERSON: Let me make sure
17 that I understand that question. This is
18 Debbie Patterson. You want to know how quickly
19 after a service order is completed that you can
20 enter a trouble report and that it flows to a
21 representative?

22 MS. OLIVER: No. And maybe the
23 question is simply what -- let me try again.

24 MS. PATTERSON: Okay.

25 MS. OLIVER: I'm looking for the

1 time frame I understand that a trouble ticket
2 can be submitted before the RSID is updated.
3 And in those cases the trouble ticket would be
4 routed to a Qwest representative to review and
5 that trouble ticket is accepted provisionally
6 in CEMR?

7 MS. PATTERSON: That is correct.

8 MS. OLIVER: So when would that not
9 happen and the trouble ticket would be
10 electronically processed? At what point in
11 time would that ticket not need to be routed to
12 the reps because there is no question about it
13 being accepted provisionally or not?

14 MS. PATTERSON: As soon as the
15 service order is completed then the information
16 for ownership is processed into the repair
17 system. So therefore at that point in time the
18 trouble ticket could automatically flow and
19 would not hit a manual person to validate the
20 ownership.

21 MS. OLIVER: So I guess I still have
22 a disconnect because I understood there is a
23 period of time between an order completing and
24 the RSID being updated. And in that period of
25 time is when the ticket would be accepted

1 provisionally and routed to a rep.

2 MS. PATTERSON: Okay. The time that
3 it takes, it takes -- at night it's downloaded
4 to the service order processor and LMOS is
5 updated from the service order processor every
6 night. So that would be therefore any
7 completed service order you would have the
8 authority to send through your trouble report
9 because the RSID is the service order is
10 completed in the system and the trouble report,
11 the repair systems are updated.

12 MS. OLIVER: Okay. So it would just
13 be a case where the order completed today as
14 before LMOS is updated in the evening with the
15 RSID update that if I submitted a ticket before
16 that evening update occurred, the ticket would
17 be provisionally accepted and routed to a rep;
18 is that correct?

19 MS. PATTERSON: Correct.

20 MS. OLIVER: Okay. Thanks.

21 MR. DELLA TORRE: Just to make sure
22 that we thoroughly confused everyone in terms
23 of being able to track where we're at, we did
24 want to address a few of the follow-up
25 questions or questions that were not answered

1 adequately from both the first and the second
2 VTCs.

3 There are 1, 2, 3, 4, 5, 6 questions
4 we would like to run through very quickly.

5 From VTC 1 test 14.7 there was a
6 question on what is the prioritization
7 mechanism for K 2?

8 Because this prioritization logic is
9 embedded in code in the K 2 system, we do not
10 know what the prioritization mechanism is.

11 Question 2 from the same test
12 section: CLEC orders will be canceled if there
13 are no facilities -- this is from AT&T by the
14 way -- CLEC orders will be canceled if there
15 are no facilities available. Will retail
16 orders be canceled for no facilities?

17 And first we would address the
18 assumption that CLEC orders would be canceled.
19 A CLEC is offered the opportunity to pay for
20 facilities to be made available. If the CLEC
21 does not agree, then the order is canceled.

22 Similarly, for retail orders, Qwest
23 makes a decision as to whether or not it wishes
24 to invest in making facilities available. If
25 not, the order is canceled.

1 From Test 18.7, there was a question
2 regarding how trouble tickets are assigned a
3 ticket number.

4 For non-designed services, trouble
5 tickets are referenced by the phone number in
6 LMOS. And for designed services, trouble
7 ticket numbers are generated by WFA/C. Those
8 are internal generations by the system and we
9 do not know the specific algorithm used to
10 create the ticket number.

11 Two questions from Test 19.6.
12 First, which organizations resolve DUF
13 problems?

14 The answer is the wholesale systems
15 helpdesk, production services, account
16 management and billing SBC.

17 The second question from Test 19.6:
18 What is the process that is followed by Qwest
19 when a CLEC notifies them that they have
20 received usage that does not belong to them?

21 The answer, the wholesale systems
22 helpdesk refers the problem to production
23 services. The usage guide file is corrected
24 and usage is reguided to the correct CLEC.

25 And the last question from VTC 2

1 Test 15, we were asked if we could provide the
2 percentage of orders designed to not flow
3 through the system.

4 The answer is therefore the normal
5 day it was 2.28 percent, for the peak day it
6 was 1 percent, and for normal and peak combined
7 was 1.34.

8 And apparently there is one other
9 follow-up. I'll turn it over to Geoff May with
10 HPC right after we address questions from Tim
11 Connally.

12 MR. CONNOLLY: On your second
13 response to the 19.6 carryover from VTC 1 --

14 MR. DELLA TORRE: Yes.

15 MR. CONNOLLY: -- is it your
16 understanding that the DUF reflowing for
17 reguiding purposes would occur unless there is
18 an intervening billing period?

19 MR. DELLA TORRE: No, that is not
20 our understanding.

21 MR. CONNOLLY: Okay. Thanks.

22 MR. DELLA TORRE: Geoff May, HPC.

23 MR. MAY: Geoff May with HP.

24 MR. DELLA TORRE: The New HP, my
25 apologies.

1 MR. MAY: Don't get me fired.

2 MR. CONNOLLY: The new Geoff May.

3 MR. WEEKS: You could say formerly.

4 MR. MAY: They might stick me at the
5 old AT&T. Mr. Connally had forwarded an
6 additional Test 15 question which we have
7 gracefully prepared for. And it reads as
8 follows: HPC will provide its description of
9 the methods it employed to record date and time
10 stamps on the outgoing and incoming IMA EDI
11 submissions in VTC number 2.

12 Did I say this was a Test 15
13 question? Okay.

14 The question was: Is the FSIS
15 (phonetic) translation at HPC performed on
16 outbound transactions performed prior to the
17 initiation of the secure socket layer SSL
18 session?

19 And the answer is yes.

20 And the additional question was: Is
21 the FSIS translation that HPC performed on
22 inbound transactions performed after the last
23 bite of data is received?

24 And the answer is yes.

25 MR. CONNOLLY: I bet you thought I

1 didn't understand that stuff.

2 MR. DELLA TORRE: Never
3 underestimate. I think we're all set for
4 today.

5 (Proceedings adjourned at 4:46 p.m.)

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