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6   ROC OSS 271 VENDOR TECHNICAL CONFERENCE #3

7   Hotel Teatro

8   1100 Fourteenth Street

9   Denver Colorado

10   Wednesday, May 15, 2002

11   8:30 a.m.

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 1   APPEARANCES:

 2   AT&T
          JOHN FINNEGAN
 3        MARY TRIBBY
          TIM CONNOLLY
 4
     HPC
 5        CHERIE MONTEFERRANTE
          DON PETRY
 6        ERIC BIGGERSTAFF
          FRANKIE BUENO
 7        GEOFF MAY
          JEANMARIE STURM
 8        JEFF CROCKETT
          KYLE KIRVES
 9        LEE TRUDEAU
          LIZ GRAGERT
10        MARY CEGELSKI
          TERRI JOHNSON
11        TRICIA PARKER

12   KPMG
          MIKE WEEKS
13        JOE DELLA TORRE
          BEN HEMPHILL
14        CARRIE THIELEMANN
          JOE GORALSKI
15        JOHN DEAHL
          LIZ FUCCILLO
16        NOLAN DINSMORE
          RUSS GUZDAR
17        ALAN SALZBERG
          YLONDA CHESTNEY
18        TERRY TRUDGIAN
          ANN LAWRENCE
19        BOB FALCONE
          BRIAN RUTTER
20        CHRIS BLACK
          FELICIA KENDRICK
21        FRED ARMSTRONG
          GEORGE CORYELL
22        JASON CUMBERLAND
          JULIANA BARTRA
23        MARCOS DaCRUZ
          MICHAEL BUJAN
24        MICHELLE TULIEN
          RICH WOODHOUSE
25        RYAN SHURTER
          SAM YEUNG
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 1   APPEARANCES (CONTINUED):

 2   KPMG cont'd
          STEVE CORECO
 3        TOBY SCHWARTZ
          VAN HOWARD
 4
     MTG
 5        DENISE ANDERSON
          BOB CENTER
 6        MARIE BAKUNAS

 7   QWEST
          ANDY CRAIN
 8        BARB BROHL
          BARRY ORREL
 9        BRAD HOFFNER
          CECELIA ORTEGA
10        CHARLIS MILLER
          CHRIS VIVEROS
11        DAN POOLE
          DEBBIE PATTERSON
12        FRED AESQUIVEL
          GARY WOODSIDE
13        JACKIE DONALDSON
          JENNIFER CALDWELL
14        KRISTIN PROVOST
          LUCY HIGLEY
15        LYNN NOTARIANNI
          MIKE WILLIAMS
16        NANCY LUBAMERSKY
          NITA TAYLOR
17        PAT HALBACH
          RON TRULLINGER
18        SCOTT SIMANSON

19   WORLDCOM
          BECKY OLIVER
20        TOM DIXON

21   NEW MEXICO
          MIKE RIPPENGER
22
     OREGON
23        IRV EMMONS

24   WASHINGTON
          DAVE GRIFFITH
25        TOM SPINKS
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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: I don't think we have

4 any announcements or any changes. Right, Joe,

5 we are just going to dive in?

6   I did do a little research on the

7 issue of the rerun of the retest. And so I

8 will give with Bob Falcone a little later and

9 John and we can share that information.

10   MR. DELLA TORRE: Good morning,

11 everyone. I wanted to start by making a

12 correction that I believe we may have stated

13 yesterday.

14   It's the notion of the standalone

15 LNP versus standalone directory listing versus

16 both at the same time. We did not do an

17 assessment of directory listings for standalone

18 LNPs by design, because we didn't think there

19 were going to be very many cases where, when

20 you are reporting the number, you are also

21 going to be doing the L change, changing the TN

22 with the number was why we didn't set that

23 scenario up to begin with.

24   I wanted to make sure we were clear,

25 we did standalone directory listings and LNP.

1   We did not do them as one activity when we were

2   assessing the directory on standalone LNP

3   orders. Just a correction from yesterday.

4   So let's jump right in to Test 12.

5   The AT&T questions.

6   Actually, let's start with

7   Washington -- the Washington questions first.

8   MR. WEEKS: On Test 12, as we

9   published the report, the draft final report,

10 there is one evaluation criteria in the not

11 complete category. That is evaluation

12 criterion 12-11-4 that says Qwest produced

13 measures of preorder order performance results

14 for HPC transactions are consistent with KPMG

15 Consulting produced HPC results. That is kind

16 of the whole essence of 31-20, exception 31-20,

17 which is also the only open exception that was

18 sitting out there for Test 12 which also

19 applies to Test 14.

20   But that is -- in not complete

21 status its status will change as is appropriate

22 to sat or not sat depending on the outcome of

23 the retest that is under way.

24   There are also five unable to

25 determines currently sitting in that report.

1   We expect that the status will remain all

2   unable to determines. Those are 12-8-2 which

3   says Qwest representatives provide timely FOCs

4   in response to local interconnect service

5   trunks ASRs. There were not enough commercial

6   observations during the course of the test for

7   us to form an opinion. So that will remain

8   unable.

9   12--9-1 Qwest provide jeopardy

10 notice in advance of the due date for resale

11 products and services. Again, this is a case

12 where there just was not sufficient data to

13 developed during the course of the test for us

14 to offer an opinion on.

15   12-9-2, Qwest provides jeopardy

16 notices in advance of due date for UNE-P. So

17 this is the same issue.

18   12-9-4. Qwest systems and reps

19 provide timely jeopardy notice for resale

20 products and services. Same answer.

21   And 12-9-5, Qwest sales reps provide

22 timely jeops for UNE-P.

23   So, we couldn't force these sorts of

24 things to happen in the normal course of the

25 test, so there weren't enough observations to

1   form an opinion on that.

2   So that is kind of the state of the

3   test activities in Test 12 in terms of the

4   status of the various evaluation criteria, and

5   what is likely to change between now and then.

6   Then finally on the issue of

7   state-specific results, I think the report is

8   clear when it calls out things that happen sort

9   of at the other-than-Qwest-total level. But I

10 don't believe there is anything in there that

11 is just purely Washington-specific data.

12   Okay.

13   MR. DELLA TORRE: I do want to give

14 it an update. On the 12-9-4 and 12-9-5, those

15 two criteria Mike just mentioned, unable to

16 determine, one on jeops for resale, one on

17 jeops for UNE-P. We do have an observation

18 out, 3108, I believe, that may be fodder for

19 discussion later today, where we did have a few

20 jeops for each of those, 9 in one case, 11 in

21 the other. When we disaggregated those

22 regionally and then did the dual test, it

23 turned out that there was a no decision, that

24 then by agreement we need to bring that to the

25 TAG.

1   For those two particular criteria,

2   the issue is still somewhat in play. So I just

3   wanted to be clear for those two. And I am

4   sure we will get to those later on today.

5   Okay, so let's move into the AT&T

6   questions.

7   Question 1: Please list the

8   documents that were circulated to the TAG that

9   explain the volume and mix of transactions for

10   Test 12.

11   The documentation we used and that

12   was circulated to the TAG was the MTP. But

13   more specifically, appendices B and K.

14   Question 2. Explain what is meant

15   by the box that states, "if integrated, proceed

16   to order."

17   And this is to clarify, we have two

18   different types of pre-order activities. One

19   we call a stand-alone pre-order where we just

20   submit the pre-order somewhat in a vacuum where

21   we are checking the functionality of that

22   particular pre-order.

23   The other type is an integrated

24   pre-order, where that pre-order and result of

25   that pre-order are then used with the

1   subsequent LSR and ordering activity. So that

2   is what that means for integrated. It's an

3   integrated pre-order that the information is

4   then used on the subsequent LSR.

5   Question 3 --

6   MR. CONNOLLY: Tim Connolly. Excuse

7   me, Joe. In the pseudoCLECs operate for EDI

8   transactions, did this integration of pre-order

9   to order worked, maybe it's a question for HP.

10 Was that part of your scheme, your system?

11   MR. MAY: Jeff May. HP. Yes, it

12 was. Pre-order to order integration was within

13 HPC's scope and its covered in Appendices B and

14 C of our final report submission.

15   MR. CONNOLLY: Can you identify

16 which pre-order query types you integrated with

17 orders?

18   MR. MAY: Those are identified in

19 that report. We are not prepared, here, to

20 summarize the report. We are happy, you know,

21 if you want to look at the reports and then

22 come back --

23   MR. CONNOLLY: We will ask you some

24 questions when we get there.

25   MR. MAY: Okay. Sorry.

1   MR. DELLA TORRE: Question 3 from

2   AT&T: KPMG states Qwest processed and returned

3   valid pre-order responses, Firm Order

4   Confirmations, error messages, SOCs and

5   completion notices.

6   AT&T believes that the valid

7   responses were eventually returned, but in the

8   course of Test 12, Observations and Exceptions

9   indicate there were many cases where responses,

10   confirmations, errors and completions and

11   completion notices were such that they were

12   invalid.

13   Is KPMG's statement overly broad in

14   this regard?

15   KPMG consultant agrees with AT&T's

16   assertion and we will amend the report to more

17   accurately reflect the life cycle of response

18   received over the course of the test.

19   Question 4: KPMG indicates that

20   "future dated" orders were entered. It is

21   AT&T's understanding that Qwest's systems

22   cannot accept orders that are dated in the

23   future.

24   What is meant by future dated

25   orders?

1   And in this case our use of the term

2   future dated is meant to indicate the desired

3   due date is set out into the future.

4   MR. CONNOLLY: Tim Connelly, AT&T.

5   Aren't all desired due dates in the future?

6   MR. DELLA TORRE: Absolutely. In

7   certain cases, particularly say for our EEL

8   orders with LNP, because the facilities really

9   weren't there, we didn't have a CLEC volunteer

10   to participate with us, what we did, we

11   extended the due date much, much further out

12   than would be expected for a standard interval

13   so we could test the functionality of the

14   interface to handle that type of an order. But

15   prevent the provisioning from happening.

16   MR. CONNOLLY: Thanks.

17   MR. DELLA TORRE: Question 5:

18   Please confirm that KPMG conducted no

19   observations of CLECs entering or processing

20   EDI transactions.

21   That is correct. We did conduct

22   interviews and observations with several CLECs,

23   but did not have an opportunity to see them

24   actually submit orders through EDI.

25   Question 6: Please explain whether

1 KPMG planned to submit LSRs for accounts that

2 had pending order activity or whether KPMG

3 found that its submittal of LSRs was impaired

4 by the existence of pending order activity.

5   The answer is yes, we did coordinate

6 with a commercial CLEC to create the situation

7 of a pending order conflict. We did find a

8 problem with that initially. We issued

9 exception 31-01. However after retesting we

10 found that Qwest was processing those orders

11 appropriately.

12   MR. CONNOLLY: So -- Tim Connolly,

13 again. Joe, is it the case that there were no

14 planned orders, sequences for the pseudo-CLEC

15 that would generate order on top of order to

16 create pending order conflict?

17   MR. DELLA TORRE: We did it jointly

18 with pseudo-CLEC and commercial CLEC creating

19 the pending situation versus pseudo-CLEC on

20 both sides.

21   MR. CONNOLLY: Thank you.

22   MR. DELLA TORRE: Question 7: In

23 footnote 15, KPMG indicates that it was

24 "stipulated in the MTP" that sample size for

25 UDIT orders was so small as to prevent

1 evaluation of UDIT ordering and provisioning

2 timeliness.

3   The phrase "as stipulated in the

4 MTP," will be removed from the final report.

5   For clarification, UDITs were not

6 one of the Appendix K products that needed a

7 statistically significant sample size and was

8 tested for functionality only.

9   MR. CONNOLLY: Is this the usual

10 stipulation that we discussed yesterday, there

11 was a section where things were stipulated and

12 what it really meant is they were documented?

13   MR. DELLA TORRE: Correct. It was

14 laid out in the MTP which was agreed to by

15 data.

16   Question 8: KPMG indicates that

17 27,485 orders were submitted to the POP

18 evaluation. What is the volume of pre-order

19 transactions submitted?

20   With two subquestions as standalone

21 pre-order transactions? And in conjunction

22 with order transactions?

23   We wanted to clarify here that these

24 27,000 orders mentioned in Section 2.4.1 were

25 actually used as part of the systems

1 availability test only. These were the ping

2 orders, if you will, where we had an automated

3 system set up to submit transactions, what was

4 it, five minute intervals, ten minute

5 intervals -- two minute intervals, to establish

6 systems availability. So that is to be

7 distinguished from the actual functionality and

8 timeliness tests and the transactions we

9 submitted in those cases.

10   All right.

11   MR. CONNOLLY: So there were no

12 pre-order transactions for system availability.

13 There were just the order pings?

14   Did you issue pre-order transactions

15 for the system availability pinging?

16   MR. MAY: That is all.

17   MR. CONNOLLY: None of them were

18 orders?

19   MR. MAY: Correct.

20   MR. DELLA TORRE: We will have to

21 verify what the type of transaction was that

22 was causing the pinging. We may have labeled

23 them as orders, they may have been pre-orders .

24 The reason for the oversight was this was a

25 systems availability ping, if you will, not for

1 the functionality of the pre-order or order

2 itself.

3   Question 9: Please explain the

4 apparent discrepancies between the number of

5 orders submitted and the number of orders

6 cited.

7   That is the same answer as 8.

8   Question 10: KPMG's statement is

9 unclear: Every transaction for which a

10 functional acknowledgment was not received was

11 counted against the availability percentage.

12   What is the availability percentage

13 calculation that is involved with not receiving

14 FA transactions?

15   An interpretation of the question.

16 I think what we're -- the way we interpreted

17 this is in the same spirit as 8 and 9, in that

18 we were doing the calculation for PIC G 82,

19 which is EDI system availability. In fact it

20 had little to do with the functionality or

21 timeliness evaluation in Test 12.

22   Maybe you could throw the

23 question --

24   MR. WEEKS: Are you asking what are

25 the numerator and denominator of the

1 calculations?

2   MR. CONNOLLY: I was first trying to

3 rationalize system availability in terms of

4 these order transactions with some calculation

5 that demonstrates the system wasn't available,

6 where you, if you didn't get an FA --

7   MR. WEEKS: If you didn't get an

8 FA --

9   MR. CONNOLLY: The system was not

10 available?

11   MR. WEEKS: Yes, in effect the

12 calculation would have been such that the

13 numerator is the FA's return and the

14 denominator would be the number of pre-orders

15 sent. So missing FAs, as this is trying to

16 indicate, would count against you in terms of

17 systems available as a percentage when it's

18 expressed as a percent of the time available.

19   MR. CONNOLLY: Did these

20 calculations then get translated into a GA2

21 like metric for your purposes?

22   MR. WEEKS: I think what we were

23 attempting to do, maybe -- hold on a second.

24   (Pause.)

25   MR. SALZBERG: HP gave us the

1   results of each transaction they sent. They

2   gave us the sent with an ID. Then the received

3   with an ID. All we did was match them up and I

4   think this analysis was for January and

5   February.

6   MR. CONNOLLY: And that allowed you

7   to calculate a GA2.

8   MR. SALZBERG: That's what we used

9   to calculate the GA2, that's right.

10   MR. CONNOLLY: For each of those

11   models?

12   MR. SALZBERG: Right.

13   MR. CONNOLLY: Thank you.

14   MR. DELLA TORRE: Question 11: What

15   data was used by many KPMG to evaluate the

16   functional of the IMA GUI.

17   What data was supplied by Qwest or

18   the P-CLEC or acquired by other means?

19   We developed the scenarios and we

20   reviewed Qwest's order processing for

21   transactions submitted by the P-CLEC.

22   Test 12 GUI functionality analysis

23   is based on P-CLEC data only.

24   MR. CONNOLLY: The range of

25   functionality is as documented in --

1   MR. DELLA TORRE: That's correct.

2   MR. CONNOLLY: -- in the MTP>

3   MR. DELLA TORRE: And the final

4   report.

5   MR. CONNOLLY: And the final report.

6   What advised you of the functionality within

7   the IMA GUI?

8   MR. WEEKS: I think you are asking

9   the question how did we gain an awareness of

10   what functionality was in the GUI?

11   MR. CONNOLLY: Correct.

12   MR. WEEKS: It was by look at

13   publicly available documentation provided by

14   Qwest.

15   MR. DELLA TORRE: Question 12: What

16   data was used by KPMG to evaluate the accuracy

17   of the IMA GUI?

18   What data was supplied by Qwest or

19   P-CLEC or acquired by other means?

20   The same answer, used HPC data,

21   initially established our expectations based on

22   Qwest documentation.

23   Question 13: KPMG states results in

24   section 3 were calculated based on HPC's

25   internal time stamps which may differ from the

1   measurement points reported by Qwest. This

2   difference is due to the fact that KPMG

3   Consulting measures HPC's end-to-end response

4   time, while Qwest measures processing time

5   within its environment. Presumably HPC's

6   measurements showed longer intervals than did

7   the Qwest reported interval.

8   Please quantify the amount of time

9   that is shown in the HPC intervals that is not

10 reflected in the Qwest measurements.

11   We did not do the analysis of

12 comparing HPC interval that is not reflected in

13 the Qwest measurements, because the only place

14 this would really be material are for those

15 transaction types that are measured in seconds

16 and, therefore, around PID PO1 and PID P03. In

17 the case of PID PO1, we can't quantify the

18 difference because Qwest does not report its

19 results on this PID on a CLEC specific level.

20 So we would not have been able to do that

21 comparison just for P-CLEC.

22   For PID PO3 KPMG actually issued

23 exception 3105, because according to our

24 measures (inaudible) response time, Qwest was

25 in fact failing the timeliness measure.

1   Qwest responded that based on its

2   internal processing time the EDI order rejects

3   were passing time limits and a certain amount

4   of HPC processing time should be taken into

5   account by KPMG Consulting in calculating the

6   results.

7   As agreed in the January 7, 2002 ROC

8   TAG and project management meeting, Qwest and

9   TAG agreed adding a certain amount of

10 processing time to the 18 second benchmark was

11 a reasonable approach to the PID calculation.

12   Question 14: KPMG reports 14

13 pre-order query types, yet in Table 12-1 it

14 establishes that Test 12 involved only 12

15 pre-order types.

16   Please identify the pre-order types

17 that were not tested in Test 12 and explain why

18 the additional pre-order query types were not

19 tested.

20   In fact, all 14 types were tested.

21 However, in the table, there are two groups of

22 two. The pre-order TNAQ and TNSQ are related

23 in that one is an availability and one is a

24 selection.

25   The same is true for AAQ and ASQ.

1 Appointment availability and appointment

2 selection.

3   So we grouped those in listing them.

4 However, we did submit and test all 14.

5   Question 15: Please describe the

6 process improvement that KPMG verified that

7 will ensure the PREMIS database is properly

8 maintained with TNs assigned to CLECs.

9   I believe this was the result of HP

10 exception 2055 and KPMG Consulting did not do

11 any retest verification for that exception.

12   If HPC would like to comment on any

13 of its retest activities --

14   MR. MAY: This is Geoff May with HP.

15   Due to the nature of the P-CLEC work

16 which is essentially black box, we would have

17 no insight into what is essentially a white box

18 oriented verification.

19   So while we raised the issue in an

20 exception, verification along these lines would

21 be a white box analysis for which we have no

22 visibility into.

23   MR. DELLA TORRE: Question 16:

24 Please quantify the number of EDI pre-order

25 transactions that were returned in excess of

1   199 seconds. Of these, indicate the percentage

2   that was returned with accurate response data.

3   There were ten pre-orders returned

4   in excess of 199 seconds, two of which had the

5   expected response, eight of which had the

6   unexpected response or 20 percent and

7   80 percent.

8   MR. CONNOLLY: Did you analyze the

9   incorrect responses to determine what it was in

10 the response that was inaccurate?

11   MR. DELLA TORRE: No, we did not.

12   MR. CONNOLLY: But the two that were

13 accurate, you evaluated them enough to know

14 they were accurate?

15   MR. WEEKS: We had to evaluate it

16 enough to figure out it wasn't what we

17 expected, but I don't think we took your

18 question to mean did we investigate beyond

19 discovering that it wasn't what we expected.

20   MR. DELLA TORRE: Typically we won't

21 do regression testing if the performance is

22 above whatever standard or benchmark we are

23 looking for. We won't explore the other

24 two percent, if you will.

25   MR. CONNOLLY: Of the eight, a quick

1   question, was the inaccuracy that the data was

2   incomplete?

3   (Pause.)

4   MR. DELLA TORRE: We did not

5   determine why we received an unexpected

6   response.

7   And just to be clear, it's an

8   unexpected response, not necessarily an

9   inaccurate response.

10   MR. CONNOLLY: Would you agree the

11 54, there is a balance of 54, if you go through

12 the numbers in this test cross-reference

13 12-2-3.

14   Those 54 are in -- just vaporized I

15 guess, cyberspace? 17-4-86.

16   MR. WEEKS: Trying to get to the

17 page.

18   MR. WEEKS: 12-2-3, pre-order

19 time-outs before receiving response?

20   MR. DELLA TORRE: Correct. There

21 were 64 that we received no response.

22   64 out of the 74. There were 74

23 that timed out. 64 of them were no response,

24 and 10 of them were unexpected responses.

25   MR. CONNOLLY: Great.

1   MR. DELLA TORRE: Question 17:

2 KPMG's report states: Of 490 LSRs submitted

3 for which an order response was expected, 490,

4 one hundred percent, received the expected

5 response.

6   What is the quantity of LSRs that

7 were issued for which no response was expected?

8   The answer is zero. We expected a

9 response in all cases of one type or another.

10   We do have the situation where a

11 test case scenario called for a supplement to

12 be submitted prior to receiving a FOC or am

13 error. But even for those LSRs we would still

14 expect the FA to come back. And we were

15 expecting a FOC or an error, but just sent the

16 supplement in in a very short window of time.

17 So there were zero LSRs that no response was

18 expected.

19   MR. CONNOLLY: An LSR that is

20 canceled would be canceled by the supplement.

21   MR. DELLA TORRE: Correct.

22   MR. CONNOLLY: In which case there

23 wouldn't be any firm order confirmation, just

24 the FA.

25   MR. WEEKS: Right. What we may be

1   struggling with here is what an expected

2   response is. As indicated we always expect at

3   least an FA.

4   MR. DELLA TORRE: No, but even on a

5   cancel, you still get a canceled FOC.

6   So it's a canceled completion. I am

7   not sure of the acronym, but there is a

8   response to a cancel.

9   It is a FOC. I have just been told

10 it's a FOC that confirms the cancel.

11   MR. VIVEROS: It's actually not a

12 FOC. It looks like a FOC. It's actually a

13 canceled confirmation. The guideline, it is

14 not confirming an order. FOC by definition

15 says I got your order, I processed your order,

16 I have turned it in to an internal service

17 order and I have assigned it a due date.

18   When we get a cancel we are doing

19 just the opposite of that and we do send our

20 response back acknowledging we have gotten the

21 cancel and we've processed it but it's not a

22 FOC. It looks like a FOC, I know it looks like

23 a FOC.

24   MR. CONNOLLY: Quack quack.

25   MR. MAY: It seems to be a

1   semantical issue.

2   MR. DIXON: A pseudo-FOC.

3   MR. DELLA TORRE: Question 18: For

4   the 11 orders that were excluded due to an

5   invalid due date, please describe the

6   conditions that caused these due dates to be

7   deemed invalid. Were the invalid due dates

8   intentionally inserted as a part of the test

9   design.

10   These were deemed invalid because

11   the due date requests were less than the

12   standard interval. And the selection of the

13   less than standard interval due dates was not

14   an intentional part of the test design.

15   Question 19: Please explain the

16   discrepancy in LSR volume between the 7,525

17   noted in this test cross-reference 12-5-10 and

18   those reported in test cross-references 12-5-2

19   and 12-5-6.

20   The LSR totals found in 12-5-10 are

21   actually the sum of 12-5-2 and 12-5-3. 2 and 3

22   are EDI and GUI, whereas 10 is the total.

23   12-5-6, on the other hand, reflects

24   the number of EDI LSRs only and, therefore,

25   can't be compared to 12-5-10.

1   As a point of fact these numbers

2   were updated in version 1.1 of the draft final

3   report.

4   Question 20: Please explain the

5   discrepancy rejected LSR volume between the 411

6   identified in the test cross-reference and the

7   3,419 reported in test cross-reference 12-5-6.

8   This is a very similar answer to the

9   previous answer except these are the GUI

10   portion of the total.

11   Question 21: Please confirm that

12   KPMG has insufficient data to report LNP orders

13   issued through the IMA GUI.

14   The LNP orders needed to be issued

15   by HPC using live CLEC CCNA codes. This can

16   only be done via the EDI system and, therefore,

17   KPMG has no dated to evaluate Qwest performance

18   on LNP orders issued via the GUI.

19   I would like to make a correction

20   that the commercial P-CLEC was not a

21   participant.

22   Question 22: KPMG reports the Qwest

23   calculated that the rejections took an average

24   of 2.36 seconds to move through HPC's systems.

25   What methods were employed by KPMG to perform a

1   calculation that verified the Qwest calculation

2   of 2.36 as being accurate?

3   We did not validate the accuracy of

4   Qwest's calculation except that we did examine

5   the time stamp differences that we both used

6   the same sets of data to come up with the 2.36.

7   We did not validate the underlying

8   accuracy of that data.

9   This is also similar or the same in

10 spirit as the question that we discussed

11 earlier when there was an agreement reached

12 with the TAG for incorporating the overhead

13 considering different points of capturing time

14 stamp data.

15   Okay.

16   MR. CONNOLLY: Best of your

17 recollection it was the same meeting,

18 January 7th.

19   MR. DELLA TORRE: I think it's the

20 same issue actually. January 7th.

21   Question 23: KPMG reports of 5,274

22 instances submitted for which a work completion

23 notification was expected, 5,243, 99.41

24 percent, received the expected response.

25   Under what circumstances would an

1   LSR not be considered an instance?

2   That is just our own language, all

3   LSRs would be considered an instance.

4   MR. WEEKS: Actually there is an

5   instance of a test case. And within the

6   confines of the instance of the test case there

7   would be an LSR. So they are two different

8   things so to speak. As we have talked about

9   scenarios would have oftentimes more than one

10   activity associated with them, like run a

11   pre-order query, submit an LSR, submit maybe

12   another LSR to cancel. So there is not a

13   one-to-one correspondence necessarily between

14   an LSR and an instance. There could be a

15   one-to-many (inaudible).

16   MR. CONNOLLY: But for this test

17   cross-reference there is a one-to-one

18   relationship between instance and LSR?

19   (Pause.)

20   MR. WEEKS: We will examine whether

21   instance or LSR is the most appropriate wording

22   here, so that the words in this evaluation

23   criterion reflect whichever of those is more

24   accurate.

25   MR. CONNOLLY: Good.

 1   MR. DELLA TORRE: Question 24:

 2 Please identify any additional reasons that an

 3 LSR would not be expected to complete besides

 4 LSRs that were canceled, rejected, or

 5 supplemented.

 6   And in this case I refer back to the

 7 answer from before where we submitted EEL

 8 orders with LNP that we pushed the desired due

 9 date well out into the future for facilities

10 reasons.

11   MR. CONNOLLY: Weren't those

12 eventually canceled, though?

13   MR. DELLA TORRE: Yes, those were

14 ultimately canceled.

15   Question 25: Please explain the

16 discrepancy between the number of LSRs that

17 generated work completion notices according to

18 5,245 and the quantities identified in test

19 cross-references 12-10-2 plus 12-10-3.

20   I will defer this question to

21 Mr. Bob Falcone.

22   MR. FALCONE: Bob Falcone, KPMG

23 Consulting. If I may I would like to address

24 25 and 27 together today, because they sort of

25 go hand in hand.

1   First of all, the answer to 27, the

2   discrepancy or the numbers that KPMG may have

3   omitted that we caught after-the-fact when the

4   report was out there was that, there was a lot

5   of confusion around PO6 quite, frankly.

6   Our initial look at this PIC, we

7   were only counting inward activities.

8   Therefore we were excluding things we shouldn't

9   have excluded when putting that PID together.

10   And we realized that report was already out

11   there. That is why your numbers won't add up

12   in your question 25 because we have things in

13   there -- we didn't have things in there we

14   should have.

15   Just to close on this PID though,

16   you will see it in the final report, for PO6A,

17   which is the GUI, we cannot self-report this

18   PID because we don't have GUI time stamps of

19   when the SOC was received, only the date. The

20   date and time stamp is a critical component to

21   calculating this PID.

22   So in the final report you will not

23   see any data for PO6A because we can't

24   self-report that.

25   However, you will see data for PO6B,

1   the EDI WCN timeliness. And KPMG can

2   self-report that and will in the final report.

3   A VOICE: It sounds like they are

4   talk -- in the room, can you hear me okay on

5   the house system?

6   (Discussion off the record.)

7   MS. ANDERSON: We are sorry for the

8   interruption here. The bridge is not as clear

9   as it was.

10   Qwest, do you need to have a meeting

11 outside? No?

12   Sorry about the problem with the

13 bridge. People can't hear quite as well on the

14 bridge today. Marie was asking the technician

15 to see what they could do. They told us to

16 flip a couple knobs up here which she did. We

17 apologize for the interruption. Let's resume

18 where we were, question number --

19   MR. DELLA TORRE: Yes. Actually, I

20 want to revisit question 23 briefly. We

21 confirmed that for that specific reference

22 instances are in fact synonymous with LSRs. So

23 we will revise the report to read LSRs.

24   Did you have a question on where we

25 were?

1   MR. CONNOLLY: Yes. I believe that,

2   Bob, I believe you said that in doing the

3   calculations for PO6A, the GUI calculation,

4   that you didn't have the time of the work

5   completion notice arrival.

6   MR. FALCONE: We don't have the time

7   stamp on and let's get the semantics right. We

8   were calling work commission orders SOCs. When

9   we receive a SOC for the GUI orders all we

10   receive is the date the SOC was received.

11   However for the calculation of this

12   PID, you read the formula on this PID, you need

13   the date and time, a critical component for

14   calculating the PID. We don't have a GUI time

15   stamp of the time of day the GUI SOC was

16   received. For the PID PO6A KPMG Consulting

17   will not be able to self-report on this PID

18   because we don't have the data to do the

19   calculation.

20   MR. CONNOLLY: We --

21   (Pause.)

22   MR. CONNOLLY: The difference

23   between the self-reporting is -- and Qwest's

24   published results is when KPMG has assembled

25   the data on its own and attempts to recalculate

1   its results with Qwest reported results?

2   MR. FALCONE: For the purposes of

3   this test any time we report out on PID results

4   we use KPMG data supplied by the pseudo-CLEC.

5   MR. CONNOLLY: So the time sent, the

6   time the FOC is sent, that is not provided in

7   the Qwest auto push message; is that correct?

8   MR. FALCONE: The SOC, the time that

9   the SOC is received is not captured on our --

10   MR. DELLA TORRE: The difference

11   being the notion of the time stamps that Qwest

12   captures and reports on versus the time stamps

13   that HPC and KPMG Consulting captures and

14   report on.

15   There may be a Qwest time stamp of

16   when they sent the SOC, but we didn't capture

17   when the SOC was received other than date.

18   MR. WEEKS: Qwest can't know when we

19   are going to receive it.

20   MR. DELLA TORRE: Only GUI.

21   MR. FALCONE: For EDI, to that

22   point, what we will do is we will take the date

23   and time, because we do have all that

24   information, when we receive the SOC. Then we

25   will use the formula to take the date and time

1   the last internal Qwest completion notice was

2   done to come up with the difference as to how

3   long it took them to send that completion

4   notice to us.

5   We will be able to do that

6   calculation on EDI and it will be in the final

7   report with the results.

8   There is no pass/fail criteria on

9   this, but we cannot do that for --

10   MR. CONNOLLY: Thanks.

11   MR. DELLA TORRE: The same concept

12   is true for questions 26 and 28 but only around

13   BCS.

14   Bob?

15   MR. FALCONE: Yes. For 26 it's the

16   same thing, PID PO7A, GUI, and PO7B, which is

17   EDI. Again, to be frank, KPMG Consulting had

18   confusion as to how they were calculated when

19   we were getting the draft report out.

20   For PO7A, we don't have GUI BCN

21   information, so we cannot self-report on this

22   PID and you will not see anything in the final

23   record on there other than a note saying we

24   could not self-report it.

25   For PO7B, we mistakenly thought we

1   didn't have them. Yet, after the draft report

2   was out we realized we do have the BCNs on the

3   EDI and we will calculate PO7B and self-report

4   what those results were.

5   MR. CONNOLLY: Qwest has not pushed

6   the GUI BCNs?

7   MR. WEEKS: Again the issue is we

8   don't have time stamp information associated

9   with those.

10   MR. DELLA TORRE: Qwest, my

11 understanding, Qwest does in fact push BCNs

12 after the CLEC requests that functionality.

13   MR. CONNOLLY: A CLEC signs up for

14 receiving BCNs?

15   MR. DELLA TORRE: Right. That is my

16 understanding.

17   MR. CONNOLLY: And they would in

18 routine get those is my understanding.

19   MR. DELLA TORRE: Correct.

20   MR. CONNOLLY: The pseudo-CLEC did

21 not sign up for those?

22   MR. PETRY: Don Petry, HP. For GUI,

23 the way that you can get -- you have to first,

24 if you wish to receive status updates, which

25 Qwest identifies as an LSR is going through

1   significant status changes within their

2   back-end systems, that is a status update

3   option, that a CLEC has the ability to sign up

4   for both EDI and GUI.

5   GUI, the way you obtain that

6   information is to go in and pull a query on an

7   order based upon PON or LSR ID, then you see

8   the statuses for that order at that point.

9   So the P-CLEC, because we have no

10   insight into when updates are going to be being

11   triggered and being pushed to the IMA system,

12   we did not go and periodically or routinely

13   pull IMA GUI submitted orders to obtain all of

14   the statuses at that point in time.

15   But that is how you would be able to

16   go in and see where the status of that order

17   is.

18   MR. WEEKS: It's not a proactive

19   push.

20   MR. PETRY: No, it's mot a push,

21   it's a query, LSR status update inquiry in

22   which you can then receive the responses back.

23   The completion notices are provided

24   on the completion reports that are produced

25   daily by Qwest.

1   MR. CONNOLLY: The service order?

2   MR. PETRY: Yes.

3   MR. CONNOLLY: But not the

4   billing --

5   MR. PETRY: Correct.

6   MR. CONNOLLY: So the inability to

7   recalculate PO7A is not because there isn't,

8   the time isn't there; is that correct, is that

9   what you just said?

10   MR. WEEKS: No, I think what we are

11 trying to say is that in order for the

12 pseudo-CLEC to have accurately determined when

13 that status of information was available, they

14 would have had to continuously pull at the

15 second level of granularity the status of those

16 individual orders. The overhead and volume

17 associated with that would have been, you know,

18 astronomical and would have probably destroyed

19 the integrity of the whole test, because you

20 would have spent so much time churning and

21 pulling that you would have chewed up the

22 machine.

23   So because of the architecture of

24 the GUI and how status information is made

25 available to CLECs, it wasn't practical, it

1   wasn't feasible for the pseudo-CLEC to collect

2   time stamps on BCN's status updates if you

3   through the GUI. We didn't do it. They didn't

4   collect it. Therefore we couldn't analyze it.

5   Therefore we can't report.

6   MR. CONNOLLY: So the underlying

7   reason for -- the discrepancy in ours, PO6A

8   versus PO7A, the reasons are substantially

9   different?

10   MR. FALCONE: If you are going by

11 the old report the numbers you see here are --

12 we were reporting based on Qwest-derived data.

13 We decided we weren't going to do that, if we

14 couldn't self report we wouldn't report at all.

15 You are really looking at apples and oranges.

16   On the total SOCs which is reference

17 12-10-1 that is the total SOCs received. For

18 PO6, you won't get any number for PO6A, we

19 didn't have the data to calculate but for B you

20 will have the number for the SOCs, the

21 timeliness of those SOCs for the EDI system.

22 And that will be in the final report.

23   MR. DELLA TORRE: To your comment

24 about the reasons, I would argue that the

25 reasons are the same, we do not have GUI data

1 for WCNs or BCNs -- PO6 or 7, so the reason is

2 the same as to why we are not reporting.

3   The underlying cause as to why we

4 don't have that data is different in each case.

5   MR. CONNOLLY: That is a good point,

6 and one I agree with.

7   MR. DELLA TORRE: Question number

8 29: I believe has been answered in this

9 discussion in that we do have our own data for

10 evaluating BCI, BCNs. That will be in the

11 final report.

12   Question 30: Please describe the

13 evaluation's comparability conducted by KPMG

14 Consulting and its findings from its review of

15 retail and CLEC operations for the following.

16   Processes that provide for

17 reservation of vanity telephone numbers. There

18 are several others but I will go one at a time.

19   KPMG Consulting compared the

20 pre-order and order requirements, the required

21 customer information, standard intervals and

22 the expedite procedures in the wholesale and

23 retail environments.

24   For vanity telephone numbers

25 specifically, KPMG Consulting compared the

1 functionality available to wholesale customers

2 and compared that to functionality available to

3 retail Qwest representatives.

4   We issued observation 3007 which

5 addressed the inability of wholesale reps to

6 electronically reserve consecutive blocks of

7 TNs, which is a type of custom or vanity

8 number.

9   In response, Qwest provided CLECs

10 access to a GUI which allowed for the

11 reservation of consecutive blocks of TNs.

12   The second functionality identified

13 in AT&T's question is to discuss processes that

14 provide for reservation of large blocks of

15 telephone numbers.

16   And the comparative analysis of the

17 processes that provide for large blocks was not

18 within the scope of the testing conducted in

19 our comparability analysis.

20   The third type are error rejection

21 codes and messages to -- provided to service

22 representatives.

23   This also was not within the scope

24 of the comparability testing.

25   We did, HPC and KPMG Consulting did

1   evaluate error response accuracy and clarity as

2   part of Test 12.

3   And the final category, the types of

4   reference materials that are made available by

5   Qwest in the form of on-line job aids, ordering

6   guides, et cetera.

7   And the availability of reference

8   materials was verified as part of our pre-order

9   order process review as described in the draft

10 final report.

11   Additionally, HPC performed a review

12 of Qwest's wholesale order, transaction

13 creation documentation as part of their

14 Test 10.

15   MR. CONNOLLY: But I didn't hear you

16 say evaluation of comparability on reference

17 materials.

18   MR. DELLA TORRE: That's correct, we

19 did not do that. We reviewed the documentation

20 stand alone, as provided to wholesale

21 providers, not as comparable between what Qwest

22 retail reps use and what wholesalers use.

23   MR. CONNOLLY: The scope issue?

24   MR. DELLA TORRE: Yes, that was a

25 scope issue.

 1   MR. FINNEGAN: I would like to

 2 follow up on the scope issue, looking at the

 3 master test plan. On page 50, table 12-4-2,

 4 pre-ordering and ordering evaluation measures,

 5 one says consistency with retail capability.

 6   That seems a pretty broad scope that

 7 could fit in a lot of things. How did KPMG

 8 come to the conclusion that the error messages

 9 or the capability to receive information on an

10 error was outside the scope?

11   MR. DELLA TORRE: We attempted to

12 look for where there would be a retail analog

13 to a wholesale operation or wholesale activity.

14   And in the case of interacting with

15 interface, whether GUI or EDI, there is not a

16 direct comparison to a retail activity where an

17 order writer is putting something directly into

18 SOP. And therefore the comparison of using,

19 assessing the completeness of GUI business

20 rules, EDI business rules, the documentation if

21 you will, or the error messages generated

22 through using those interfaces, we believe was

23 not part of the scope of the underlying

24 ordering of products and services that was in

25 fact part in the scope of the underlying

1   evaluation.

2   MR. WEEKS: What we're trying to say

3   is each of the particular types of error

4   messages and so on is unique to the interface

5   being used.

6   So while we wanted to make sure that

7   the functions the two did were similar, we

8   believed, in answer to your question, we

9   believed that the error messages and things

10 would be unique to that interface and didn't

11 necessarily have the same need for

12 comparability as did the basic requirements for

13 functionality.

14   MR. FINNEGAN: Let me give you an

15 example. Let's say a retail rep is entering an

16 address and put the wrong address in. It

17 bounces up against the database, comes back

18 with an error message that goes right to the

19 field on the form that is incorrect and

20 highlights it in red. Wherefore the CLEC, when

21 the CLEC enters an incorrect address there is a

22 message back that says you got something wrong

23 on this LSR.

24   MR. WEEKS: Okay, that is the

25 hypothetical. Go ahead.

1   MR. FINNEGAN: Hypothetical. That's

2   what the type of comparative, granted, this is

3   somewhat qualitative, but the criteria type for

4   this consistency with retail capability, one of

5   them was qualitative. Yes, they are different

6   interfaces, but if the capability is superior,

7   inferior, one way or another --

8   MR. WEEKS: John, to answer your

9   question I think we were looking slightly at a

10   higher level when we did our comparability of

11   functionality. It was the ability to add,

12   subtract, multiply, and divide. It wasn't that

13   the screen color was prettier or -- unless it

14   was radically different and we could figure it

15   out by the level of what we were doing we might

16   have commented on such a drastic change as

17   that.

18   But I don't think we designed the

19   test to uncover every instance of where there

20   was this really substantive, in the way that

21   you are describing, difference in the user

22   interface itself.

23   We were looking at features and

24   functions, not sort of the details of the

25   implementation of those features and functions.

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 1          MR. FINNEGAN:  So I understand your
 2   response, it would be --
 3          MR. WEEKS:  That is a lower level of
 4   detail than we really went to in the test.
 5          MR. FINNEGAN:  But trying to get an
 6   idea of the sensitivity --
 7          MR. WEEKS:  Right.
 8          MR. FINNEGAN:  -- we get reject
 9   messages, they get reject messages.  Is that
10   considered equivalence?
11          MR. WEEKS:  I think that the
12   interface provides meaningful feedback in both
13   cases would have been would be of the things we
14   would have looked at.
15          To say the retail error messages are
16   more robust than the wholesale messages would
17   have required a great deal of analysis,
18   hundreds and hundreds of message formats, and
19   we just didn't go to that level of detail when
20   we did this comparability analysis.
21          MR. FINNEGAN:  Okay.
22          MR. DELLA TORRE:  Question 31:  How
23   is it determined that a pre-order transaction
24   had timed out.
25          That would be either pre-order
```

1   responses that did not receive a response, or

2   those that received responses in greater than

3   two hundred seconds.

4   Question 32: Please identify the

5   retest quantities that were the basis for

6   closing exceptions 2029, 2031, 2032, 2033, 34,

7   36 and 37.

8   Okay?

9   MR. FINNEGAN: Can we not go back

10 for a second to the last one, how is it

11 determined that a pre-order transaction had

12 timed out, the last one. Did you receive valid

13 responses after two hundred seconds?

14   MR. DELLA TORRE: Yes.

15   MR. WEEKS: We talked about those a

16 little while ago. Tim was asking questions

17 about those.

18   MR. FINNEGAN: And --

19   MR. VIVEROS: I was trying to figure

20 out which question you are on.

21   MR. WEEKS: Question 31.

22   MR. FINNEGAN: There was a

23 supplemental additional set of AT&T submitted

24 questions, so we merged those together.

25   MR. WEEKS: Yes, of HPC submitted

1   questions. We merged them together.

2   MR. FINNEGAN: It was submitted May

3   7th.

4   MR. DELLA TORRE: Question 16:

5   John, is where we were talking about the ten

6   pre-orders that were both expected and

7   unexpected responses greater than 199 seconds.

8   MR. FINNEGAN: Okay.

9   MR. DELLA TORRE: So question 32 is

10   a request to identify retest quantities for a

11   series of HPC exceptions, hence we will defer

12   the answer to HPC.

13   MR. MAY: Geoff May, with HP. For

14   exception 2031, give us a minute on 2029. I

15   will come back to that one.

16   Exception 2031, zero instances out

17   of a total of 3,770 original and supplemental

18   LSRs.

19   Exception 2032, zero instances out

20   of a total of 2m211 original and supplemental

21   LSRs.

22   Exception 2033, zero instances out

23   of a total of 3,770 original and supplemental

24   LSRs.

25   Exception 2034, 11 instances out of

1   a total of 3,770 original and supplemental

2   LSRs.

3   Exception 2036, 2 instances out of a

4   total of 90 original and supplemental LSRs.

5   Exception 2037, zero instances out

6   of a total of 3,770 original and supplemental

7   LSRs.

8   If we may come back to 2029, we are

9   just trying to pull that.

10   MR. WEEKS: Do you want to come back

11   to it later?

12   MR. PETRY: Yes.

13   MR. WEEKS: Question 33: Were the

14   results for PO-4A a combination of the results

15   of PO-4A-1 and O-2.

16   The answer is yes.

17   MR. DELLA TORRE: Question 34: For

18   the PO-4A errors that were unplanned errors,

19   please identify where the unplanned error count

20   by reason code and percentage of total can be

21   found.

22   There is a citation from the MTP.

23   KPMG will defer this question to

24   HPC.

25   MR. MAY: This is very important.

1   MR. WEEKS: Yes.

2   MR. MAY: Geoff May, HP.

3   Though the raw data is available,

4 HPC was not assigned, by assigned I don't mean,

5 I just sort of mean by the scope, I guess it

6 was outside the scope, for HPC for this kind of

7 statistical analysis or calculation.

8   MR. FINNEGAN: It was in the MTP.

9 It was outside the scope for HP -- was it

10 outside the scope for KPMG?

11   MR. DELLA TORRE: We would not be

12 able to calculate unplanned errors.

13   MR. WEEKS: If HP has the

14 information and wants to provide it to us, we

15 can calculate it. We have not been given that

16 information.

17   MR. FINNEGAN: Can I go back to

18 question 35 for a moment?

19   Would it be possible --

20   MR. DELLA TORRE: 33?

21   MR. FINNEGAN: 33, I am sorry.

22   Would it be possible to get the

23 split for the 4A-1 and 4A-2 reject rates?

24   MR. DELLA TORRE: Yes, we will get

25 that for you and return to it later.

1   MR. FINNEGAN: For the record,

2   PO-4A-1 are the rejects that were rejected

3   manually and the PO-4A-2 were the rejects that

4   were rejected automatically.

5   MR. DELLA TORRE: We will provide

6   that at the conclusion of the test section.

7   Question 35: Were the results of

8   the PO-4B a combination of results for 4B-1 and

9   4B-2.

10   And the answer is yes.

11   MR. WEEKS: Same Qwest?

12   MR. FINNEGAN: Yes, thank you.

13   MR. DELLA TORRE: Question 36 is

14   similar to 34. We will defer that to HPC.

15   MR. MAY: And our response is the

16   same.

17   MR. WEEKS: As is ours.

18   MR. DELLA TORRE: Question 37:

19   Please confirm that KPMG Consulting

20   intentionally submitted 30 orders that it

21   expected to be rejected.

22   This is a correction that will be

23   made to the final report. Those were

24   unplanned, those 30 rejects were unplanned

25   rejects.

 1   Question 38 --

 2   (Pause.)

 3   MR. DELLA TORRE: Okay. Just

 4   returning briefly to question number 33 and

 5   question 35. On the request for information

 6   disaggregating those two PIDs, we will not be

 7   able to provide that disaggregation data today,

 8   but we will follow up with those numbers.

 9   MR. CONNOLLY: Follow-up question on

10   37, Joe.

11   I understood you to say that the 30

12   errors were unplanned errors. How are those

13   different from unplanned rejects?

14   MR. DELLA TORRE: We use those words

15   interchangeably typically, error and reject.

16   MR. WEEKS: In theory you could make

17   an error that wouldn't result in a rejection,

18   it would maybe just fall out (inaudible), but

19   in this case because of the way the criteria

20   WAS written it means an unplanned error that

21   resulted in a much --

22   MR. DELLA TORRE: That is correct.

23   MR. WEEKS: This was a manual order

24   criterion? Okay.

25   MR. DELLA TORRE: Question 38.

1   (Inaudible).

2   MR. CONNOLLY: In 12.5-7 -- those

3   are fax orders?

4   MR. WEEKS: Yes, submitted via fax.

5   MR. DELLA TORRE: Question number

6   38: Please indicate from what population the

7   sample of 150 FOCs was taken from.

8   Please indicate how KPMG Consulting

9   arrived at the quantity of 150.

10   And the sample was taken from the

11   universe of FOCs received and the 150 was

12   selected because we have a typically minimum

13   sample size of 140 in this type of instance and

14   we just divided evenly across the product types

15   resale, UNE-P, and UNE loop, 50 each.

16   Question 39: It would appear that

17   Qwest was unable to account for 418 of the

18   orders that were submitted during the test.

19   Were these orders lost orders? How

20   did KPMG Consulting and/or HPC react to valid

21   orders that never reached a terminating state?

22   First point of interest, the 418

23   orders was actually a miscalculation. Version

24   1.1 of the report reflects 51 orders,

25   4.5 percent, calculated or unaccounted for.

1   Subsequent to the receipt of these

2   questions and additional research conducted, we

3   determined these 51 orders didn't receive a

4   functional acknowledgment. However, they did

5   receive FOCs and/or errors and, therefore,

6   should not have been counted as lost orders,

7   but simply orders that didn't receive a

8   functional evaluation and, or functional

9   acknowledgment, and, therefore, the calculation

10   for PO-10 is actually one hundred percent.

11   MR. FINNEGAN: Did KPMG investigate

12   why it would not have received a functional

13   acknowledgment but did receive either an FOC or

14   a rejection notice?

15   MR. DELLA TORRE: There were

16   exceptions raised. This was part of the

17   disorderly order circumstances or events that

18   occurred early on, so there were several

19   exceptions related to that time period of order

20   response flow inaccuracies.

21   MR. FINNEGAN: Can you describe in

22   some detail what happened between the initial

23   version of the draft final report and version

24   1.1 and accounted for the difference of 418 to

25   51?

1   MR. DELLA TORRE: It was actually a

2   very simple mathematical error, where we

3   inverted numbers in adding them together and

4   then subsequently subtracting them. It was

5   really a very, very basic mathematical mistake.

6   So question 40 actually addresses

7   the same issue.

8   As does 41.

9   Question 42: Please identify where

10   the CLEC aggregate measures as a data point to

11   check for consistency are reported.

12   This actually -- this may be a bit

13   of just a linguistics issue. The CLEC

14   aggregate measures are actually the PID

15   performance reports that are out there on the

16   web site, Qwest's web site. It's the monthly

17   PID reports. That is in fact the CLEC

18   aggregate values.

19   We did not choose to include that on

20   the draft final report due to the volume of

21   information provided and the fact it's publicly

22   available.

23   Question 43: Is it KPMG

24   Consulting's belief that the steps Qwest took

25   to improve the manual reject response time were

1 a direct result of exception 3020?

2   We actually have know basis for

3 forming an opinion to answer this question.

4 There is a representation made by Qwest in

5 response to the question that several of the

6 initiatives were on their way prior to the

7 release of the exception, but we have no way to

8 substantiate that assertion.

9   Question 44: Please explain why

10 KPMG Consulting reference UDIT in a test

11 cross-reference concerned with interconnection

12 trunks.

13   And in this case KPMG mistakenly

14 took an engineering view of you UDITs and

15 thought they were synonymous with LIS trunks.

16 Subsequently we have come to understand this is

17 not the case as per the tariff, understanding

18 of how you UDITs are to be treated and the

19 evaluation criteria will in fact be removed

20 from the report.

21   MR. WEEKS: UDITs and LISs are

22 different in tariffs, even though from an

23 engineer's perspective they look very similar.

24   MR. FINNEGAN: That I understand. I

25 don't understand why you removed the evaluation

1   criteria.

2   MR. FALCONE: We are not removing

3   the evaluation criteria from UDITs from a

4   functionality -- (inaudible). However this

5   particular cross-reference is timeliness, I

6   believe a FOC timeliness. If you go to the PO5

7   PID there is no criteria for you UDITs today

8   established for FOC time limits.

9   MR. FINNEGAN: But there is for

10 interconnection service trunks, LIS trunks.

11 Evaluation criteria is concerned with LIS

12 trunks.

13   MR. FALCONE: LIS trunks were not

14 the scope of the test, though. Again, this may

15 be a semantics issue. I mistakenly thought you

16 UDITs and LIS trunks were one and the same.

17 That is why we put them in this category.

18   If you of asking what the timeliness

19 experience was on LIS trunks we have no

20 experience because they were not -- if you look

21 at the MPT, Section D, Appendix D if you look,

22 they were not in the scope of the test.

23   MR. FINNEGAN: The error would have

24 been referring to interconnection service

25 trunks in the evaluation criteria.

1   MR. WEEKS: Yes, even putting that

2   in was inappropriate given they were out of

3   scope.

4   A VOICE: Either category of

5   products -- do you want to say it?

6   MR. CRAIN: Andy Crain, for Qwest.

7   Neither category of products was designed to

8   have a statistically significant sample for

9   this kind of measurement, so this kind of

10   evaluation wasn't intended to be in there.

11   MR. WEEKS: It's a mistake on our

12   part.

13   MR. FINNEGAN: Okay.

14   MS. NOTARIANNI: Lynn Notarianni

15   from Qwest. Just a clarification.

16   At the beginning of the meeting

17   today you indicated that there were five I

18   believe unable-to-determines that would remain,

19   12-78-2 was one of those, so I assume that

20   would change.

21   MR. WEEKS: No, we are going to

22   leave that in there.

23   MS. NOTARIANNI: Just to give me

24   another number to worry about.

25   MR. WEEKS: If you'd like us to

1   leave it in, we'll leave it in.

2   MR. DELLA TORRE: Question 45: This

3   goes back to the discussion we began earlier

4   around jeopardy notices and PID PO9. Please

5   explain why KPMG Consulting reached an unable

6   to determine result from PO9 when Qwest has

7   missed commitments for resale orders.

8   In fact during Test 12 there were

9   nine misses and we did not receive jeopardy

10 notices for those missed orders.

11   Therefore, we raised observation

12 3108 after disaggregating those nine by region,

13 the dual test resulted in a no decision and,

14 therefore, needs to be brought to the TAG for

15 an agreement on how to proceed.

16   This is the same issue as question

17 number 46 but only for UNE-P orders versus

18 resale orders. And for the UNE-P there were 11

19 misses with no jeopardy notices.

20   MR. WEEKS: These are unables that

21 will get revised based upon the decision taken

22 by the TAG.

23   MR. DELLA TORRE: Before you

24 proceed, John, there was some discussion given

25 that most of the parties of the TAG are

 1 actually participating in this here today, that

 2 questions 45 and 46 could serve as a platform

 3 to discuss observation 3108 as part of the,

 4 quote, TAG Forum. So I would like the parties

 5 to consider that and we can drift away from

 6 these two questions and to the discussion of

 7 that observation.

 8   MR. FINNEGAN: Prior to that can I

 9 ask a clarifying question? In observation 3108

10 it shows a sample size of 20. And you had

11 referenced nine misses.

12   MR. DELLA TORRE: Nine for resale,

13 11 for UNE-P, total of 20.

14   MR. FINNEGAN: Thank you.

15   MS. ANDERSON: I think the idea was

16 we have most of the TAG folks here. If it's

17 not going to be an issue, we could take care of

18 it right now. At least get the issues on the

19 table.

20   If that is not agreeable, we could

21 defer it and, our next TAG meeting will be next

22 Thursday. We don't have one this week.

23   MR. WILLIAMS: Mike Williams with

24 Qwest. We are ready to discuss it if the other

25 parties are willing to go a head-on that basis.

1   MS. ANDERSON: It's similar to the

2   delayed order type thing where it's kind of

3   like you can't get them or can't plan them.

4   MR. FINNEGAN: What about Wayne

5   Hart's suggestion of combining the results?

6   MR. DELLA TORRE: We have done that

7   and would be prepared to share that.

8   MR. FINNEGAN: Does that still

9   result in a no decision ?

10   MR. SALZBERG: This is Allen

11   Salzberg.

12   In anticipation of that suggestion,

13   Wayne's e-mail and (inaudible) in talking about

14   it, we went back and calculated three different

15   P values that combined results in different

16   ways.

17   The first two combined the results

18   of the regions but keep the products separate.

19   When doing that, you still have a no decision

20   and P values for resale and UNE-P are .13 and

21   .08 respectively.

22   If you also combine the products so

23   you use have one large grouping of 20, 40

24   missed jeopardies, if that is the right term,

25   missed jeopardies, but then you have a P value

1   of .01 and it turns into a fail.

2   So that is the additional

3   information we can provide you.

4   MR. WEEKS: Is that well understood?

5   Do we need to go through that again?

6   MS. ANDERSON: Could you go through

7   the first one again?

8   MR. SALZBERG: The first one we --

9   for resale the P value was .13. And for UNE-P

10   it was .08. So that is still a no decision in

11   both cases.

12   MR. DELLA TORRE: Combined regions,

13   it remains a no decision.

14   Combined products becomes a fail.

15   MR. WILLIAMS: This is Mike Williams

16   from Qwest. If I could offer some perspectives

17   and our response.

18   We would note that the context here

19   is that an area which, by nature, would not

20   receive statistically significant volume, so we

21   know from the outset that this is not one that

22   the test was expecting anyone to make

23   statistically significant conclusions.

24   We also note that low volumes in

25   fact are desirable in this particular

1   measurement, PO9 rejects or jeopardy

2   notification, the percent of them that are

3   given in advance.

4   And so the dual test, in effect,

5   really wasn't required to be done, because the

6   statistical significance was not required.

7   Nevertheless, it was done. And

8   supports the idea that this -- that there is

9   not enough information to make any conclusion.

10   So we would agree with what KPMG put

11 in their initial conclusion in principle.

12 There are some details we might take issue

13 with, but just the concept that there is not

14 enough information from the test to conclude

15 anything about jeopardies.

16   We would note as a technicality in

17 terms of the wording of a conclusion, in such

18 cases where statistical significance is not

19 required, the presumption is parity in the

20 absence of evidence to the contrary.

21   So we would submit that the

22 conclusion could be properly stated as, there

23 is not enough information to conclude that

24 Qwest is not providing parity service.

25   Now, having said that, I would also

1   note that all of these orders were of a

2   non-facility reason for their date to be

3   missed.

4   We would also note as we have

5   brought out in the past, in past TAG meetings

6   and discussions that the vast majority of our

7   jeopardy notifications are for facility

8   reasons, largely because that is the

9   predominant method or process by which we can

10 identify or provide notices.

11   So where -- we have a situation

12 where the test has, for its own reasons,

13 developed a collection of orders which aren't

14 typical of the cross-section of the total

15 measurement of PO9. The typical cross-section

16 will have the vast majority of jeopardy

17 notifications being facility reasons for the

18 miss.

19   And so you would expect -- or you

20 wouldn't be surprised, maybe you wouldn't

21 expect but you wouldn't be surprised when you

22 roll up all the products as done in the latest

23 combined region combined products, that you

24 might get a fail there, because you are looking

25 at a subset of orders that are in the grouping

1   that is among those that don't typically get

2   jeopardy notifications.

3   An example would be where we can't,

4   basically, give a notification in advance of

5   the due date because the interval is a zero-day

6   interval or one-day interval. The practicality

7   of it is that you just don't see such very

8   commonly.

9   So we would submit that while, you

10   know, in detail you could look at orders and

11   compare retail and wholesale, the point is that

12   we don't have a representative population

13   sufficient to declare a fail when combining the

14   results with what really retail is looking at.

15   The whole set of the test population is only --

16   only contains non-facility situations in this

17   case.

18   So again, we would kind of go back

19   to the simple level and say we would be content

20   with a conclusion that says there is not enough

21   information to conclude we are not providing

22   parity.

23   MR. FINNEGAN: John Finnegan. If I

24   could respond.

25   We heard yesterday from KPMG that

1 there was no minimum sample size for parity

2 test that KPMG looked to, with the dual test,

3 if the dual test came out with a result, there

4 was no need to have a minimal sample size

5 before any conclusion was reached.

6   What the PIDs do is have for resale

7 and UNE-P a measure of when you miss a

8 commitment, what percent of the time do you

9 provide a jeopardy notice.

10   Yes, it's good that the number of

11 missed commitments is low. But that is not

12 what this is measuring. This is saying when

13 you do miss a commitment, what percent of the

14 time do you provide a jeopardy notice.

15   In the case of the test that was

16 zero percent. They didn't provide any.

17   If you look at the results of the

18 dual test, in the first analysis that Allen

19 talked about, you look at it just for resale,

20 what those P values mean is, if you assume

21 parity, what is the likelihood that you will

22 get results that bad, meaning zero percent

23 jeopardy notices provided when there is a

24 miscommitment.

25   What that says is there is only a

1   13 percent chance that the results would be

2   that bad if there is parity.

3   The other side of the dual test says

4   if you assume there is discrimination, what is

5   the likelihood that you would receive

6   zero percent?

7   The likelihood if you assume

8   discrimination of getting zero percent is a P

9   value of 1, a hundred percent.

10   If you want to look at it from a

11 statistical perspective, the results are

12 certainly leaning very strongly towards the

13 conclusion of disparity.

14   If you combine the resale and UNE-P

15 results even further to get that sample size up

16 to 20, the retail analog that is being compared

17 to for resale and UNE-P are the same. If you

18 look at observation 3108 and look at the retail

19 sample size, you can see the exact same

20 numbers. What that means is for the resale

21 CLEC results it was comparing it to the exact

22 same retail results as was for the UNE-P

23 results.

24   In that case if you combine the

25 UNE-P and the resale results, again, what the P

1   value of .01 means is if you assume

2   non-discrimination, if you assume parity, what

3   is the probability that you would get results

4   that bad, meaning zero percent jeopardy notices

5   provided. And it's 1 percent, one out of a

6   hundred. That would be a clear fail under the

7   dual test.

8   From a test perspective and the

9   evidence that is available from KPMG, I believe

10 there is enough information available for KPMG

11 to render a decision. I would say the results

12 show disparity from a test perspective.

13   If Qwest wants to argue some other

14 facts to the contrary outside this test, that

15 is certainly within their purview, but from a

16 test perspective I think the facts speak for

17 themselves and they do strongly point towards a

18 conclusion of disparity.

19   MR. DELLA TORRE: I would like to

20 make one point of fact, that the unable to

21 determine that is in the draft final report was

22 not put in there based on the evidence we are

23 discussing here right now.

24   The unable to determine that was in

25 the report was based on our analysis of the

 1   1500 retest transactions where in fact we did

 2   not receive any jeopardy notices and,

 3   therefore -- or misses, and, therefore, were

 4   unable to determine on zero data. That was a

 5   mistake.

 6   When we went and looked at the

 7   entire life cycle of the test it was only at

 8   that point, and this was actually because of

 9   work we were doing based on questions submitted

10   to us by AT&T, did we note that there were in

11   fact 20 misses and no jeopardies.

12   So then we went and did this

13   analysis, issued the observation, we are having

14   the discussion now.

15   So please understand that our

16   conclusion of unable to determine is not based

17   on the information that we are drawing now.

18   MS. ANDERSON: That's right.

19   MR. DELLA TORRE: We are putting

20   this forward to the TAG and there is precedent

21   for situations where no decisions have been

22   reached through the dual test that is brought

23   to the TAG. In fact, one was related to

24   jeopardy notices. Another was delay days, if I

25   recall. And the TAG came to a conclusion.

1   And we cited that conclusion as the

2   result in our report.

3   So the same is true here. We may be

4   inclined or we will adhere to the TAG decision

5   if one is concluded on this observation. And

6   these particular results may change to satisfy

7   or not satisfy, based on the outcome of this

8   TAG discussion.

9   I just wanted to make clear the

10 unable to determine, where it came from.

11   MS. ANDERSON: What I am hearing

12 initially is that there are conflicting views

13 as to what the TAG might come to as a

14 conclusion.

15   For example, if I were to propose

16 that the TAG say that this item be given

17 satisfied as a result of this discussion, would

18 there be any objection?

19   A VOICE: Yes.

20   MS. ANDERSON: Okay.

21   MR. WILLIAMS: And we would agree

22 there is not enough evidence to say.

23   MS. ANDERSON: Okay. So what I

24 would like to suggest. I just wanted to make

25 sure that I was reading the situation properly.

 1   I would like to suggest we put this on the TAG

 2   call for a week from tomorrow and we will go

 3   through whatever discussion and dialogue and if

 4   it's at impasse we will have the steering

 5   committee settle it shortly after that, either

 6   on the Thursday call or go to impasse.

 7   MR. CRAIN: The only question I

 8   have, Denise, is that timely for getting out

 9   the final report or do we need a special TAG

10   meeting before that and maybe Friday we ought

11   to have a conference call on this or something?

12   MS. ANDERSON: We could do something

13   before then. I will leave it to KPMG. If we

14   had a decision by -- what is your drop dead

15   date?

16   MR. DELLA TORRE: It would be

17   beneficial to us if we could move it forward by

18   24 or even 48 hours.

19   MS. ANDERSON: Why don't we plan to

20   do a special TAG call then early on Monday

21   morning.

22   VOICE: Are we at impasse?

23   MR. WILLIAMS: It sounds like it.

24   MS. ANDERSON: Do we want to just do

25   impasse statements and the steering committee

1   could settle it on their Monday call? That

2   will work, too? Okay.

3   MR. CRAIN: Okay.

4   (Pause.)

5   MS. ANDERSON: What we will do

6   absent objection is this evening I will send

7   out an impasse statement template. You guys

8   can fill in your stuff, get it back by Friday.

9   I will get it to the steering committee over

10   the weekend and the TAG of course and steering

11   committee can settle it on their Monday call.

12   MR. WEEKS: Can I ask what the

13   impasse is? Is the impasse over whether or not

14   there is enough information to form an opinion

15   and one position is there is not enough

16   information, the other position is there is

17   enough information?

18   MR. FINNEGAN: Just to clarify

19   AT&T's position is, there is sufficient

20   evidence to say --

21   MS. ANDERSON: Not satisfied.

22   MR. FINNEGAN: Failure of the

23   statistical test in that observation.

24   As far as what conclusions KPMG

25   reaches as a result of that, I don't think

1   either AT&T or Qwest should put conclusions in

2   your head.

3   MR. WEEKS: That is what I am

4   trying --

5   MR. FINNEGAN: That is entirely up

6   to you.

7   It's not an issue of the result of

8   satisfied or not satisfied for the particular

9   test cross-reference. It is for that

10 observation is there sufficient evidence to

11 conclude a test failure or test pass or a no

12 decision.

13   MR. DELLA TORRE: And just based on

14 precedent, the other no decision situations

15 that we have encountered that have been brought

16 to the TAG have been brought because of low

17 volume, and yet we have reached a conclusion.

18   So, low volume has been a situation

19 we have dealt with before, and we have still

20 decided on a pass/fail.

21   I can pretty much confidently say

22 that that pass/fail will also result in a

23 sat/not sat for this criteria.

24   MR. WILLIAMS: Just to balance

25 AT&T's position with our position, it is not

 1   only that there is not enough information, but

 2   that in the context of what the test is

 3   requiring, it has not required statistical

 4   significance for this measurement. A dual test

 5   is technically not appropriate, not required,

 6   not a standard that has to be met. If it is

 7   applied, it's being applied in unfair

 8   circumstances where, by definition, the volumes

 9   have not provided the alpha and beta levels,

10   the type 1 and type 2 error levels that we

11   would feel comfortable with. There is a lot of

12   issues there.

13   But the key point is not enough

14   information. But also that what information we

15   have is not designed, was not planned to be a

16   proper comparative at these volumes for the

17   retail comparison. In other words, you have

18   got the non-facilities versus the retail which

19   contains a lot of facility.

20   MS. ANDERSON: Okay. So I think in

21   terms of the impasse document that I will put

22   out, it basically, the issue which Mike

23   clarified, thank you, is sufficient information

24   to reach a decision, not should it be pass or

25   fail. You guys can put all your unfair, not

1   enough this, and plenty of everything to say

2   no-go in your position statements. And the

3   steering committee will, as they always do,

4   play Solomon.

5   So, what I would like to do --

6   MR. DELLA TORRE: We will be left at

7   that point without a decision, though. If the

8   decision on that impasse will not result in a

9   conclusion on this issue.

10   MS. ANDERSON: Well, I think the

11   steering committee can decide what direction

12   they want to take. Maybe the direction is that

13   it just remains unable to decide.

14   MR. VIVEROS: Denise, (inaudible)

15   there is not piece of information to get out

16   there. They did issue 3108. Qwest has not

17   responded to that. We are in the process of

18   doing that. In our response will be some

19   disagreements around the base number. So from

20   our perspective the number is going to get

21   smaller.

22   We think it's important that KPMG

23   see and analyze our response and provide

24   feedback before the steering committee makes

25   their decision.

1   MS. ANDERSON: Okay, so when will

2   you have your response?

3   MR. VIVEROS: We are working to get

4   our response out today.

5   MS. ANDERSON: Okay, so the timing

6   should work. (Inaudible) meanwhile we will get

7   the impasse statements together and go from

8   there.

9   MR. FINNEGAN: Is it appropriate to

10   get the impasse statements if we haven't seen

11   Qwest's response or KPMG's response to the

12   response?

13   MR. WEEKS: I agree. I was getting

14   ready to say the same thing. I think we need

15   to hold off drafting everyone's positions until

16   we have had a chance to reassess the response

17   to the observation.

18   MS. ANDERSON: Okay. So they are

19   going to get theirs out tomorrow. Then when

20   would you folks think you would --

21   MR. DELLA TORRE: Friday, close of

22   business at the earliest.

23   MS. ANDERSON: At that point that

24   will be distributed to the TAG. I will send

25   the template out, you guys can start it. But I

 1   would need to have it back by Sunday, COB, and

 2   then the steering committee could have the

 3   morning to look it over and raise any questions

 4   that we could get folks on the phone about.

 5   MR. FINNEGAN: Not to throw sand in

 6   the gears here, but KPMG may not disagree with

 7   Qwest's response. And that may not be the end

 8   of it, once KPMG responds.

 9   Rather than put a date certain on

10   the impasse, I think we need to wait until the

11   argument of the facts has been resolved.

12   If we can set it conditionally, if

13   KPMG agrees on the facts, after review of

14   Qwest's response, it might be appropriate to

15   have a Sunday COB deadline.

16   But if there is still some dispute

17   on the facts after KPMG's response, it would be

18   premature to start the impasse process.

19   MS. ANDERSON: It's looking a lot

20   like next Thursday, isn't it?

21   MR. FINNEGAN: Well, it doesn't have

22   to be next Thursday, but it doesn't also have

23   to be Sunday.

24   MR. HART: I think it's still better

25   to plan for a Monday decision. And if we can't

1   reach one at that point, let's not go.

2   MR. FINNEGAN: Frankly, I would be

3   comfortable without write-ups, have a quick

4   call, argue the facts, then let the steering

5   committee make their decision.

6   MS. ANDERSON: Well, I would

7   hesitate to not have a write-up. Look how many

8   times we go back to look what the record said,

9   look how many times we go back to look at the

10 TAG minutes. That came up yesterday. I just

11 gave Bob an excerpt from the TAG meetings.

12   Otherwise, in hindsight we say well,

13 what I really meant was, and you know, I just

14 would prefer not to do it that way. But maybe

15 we could combine the approach and maybe have a

16 quick call and have paperwork that follows

17 that.

18   MR. FINNEGAN: Or transcript.

19   MS. ANDERSON: With no augmentation

20 of what was said.

21   MR. FINNEGAN: Or transcribe the

22 call.

23   MS. ANDERSON: Yeah, we could do

24 that.

25   MR. CONNOLLY: You are just talking

1   about transcribing presentations of the

2   parties.

3   MS. ANDERSON: Yes. But by the time

4   we do that you might as well write it up and

5   send it to the TAG.

6   Why don't we do that. We will

7   proceed with the next steps, which are the 3108

8   response from Qwest, then KPMG's review. And

9   why don't we schedule a call for Monday morning

10   at 8 Mountain, and try to make sure we know

11   where we are at. If a quick write-up is

12   required from each party after their

13   presentation, we won't even have to have that

14   transcribed. That could be discussed,

15   provided, have them decide it that day if

16   appropriate or reschedule until Tuesday or

17   Wednesday depending on what the facts are at

18   that moment.

19   Would that be agreeable to the

20   parties?

21   It appears John is shaking his head.

22   MR. FINNEGAN: Yes, that is fine.

23   MS. ANDERSON: Anyone at Qwest --

24   Chris shook his head. Okay.

25   (Laughter.)

 1   MR. DELLA TORRE: If I could suggest

 2   quickly we have two more questions for AT&T

 3   Test 12, then we will take our morning break.

 4   Let's run through these real quick

 5   and take a time out.

 6   Question 47: In discussing the PO-9

 7   results for unbundeled loops, KPMG Consulting

 8   references the number of orders received in

 9   each of the three regions. Should the

10   reference of the number of orders received have

11   been the number of orders missed?

12   That is correct. We will make that

13   change to the final report.

14   Question 48: I believe this was

15   originally intended for HP.

16   Scenario 10 of Exception 2068

17   identifies 32 instances where Qwest assigned a

18   customer-not-ready code to Pseudo-CLEC orders.

19   Did HP concur that it was not ready

20   for installation?

21   Please describe the conditions that

22   resulted in HP not being ready.

23   This was actually properly deferred

24   to KPMG Consulting, and we do concur. We were

25   not ready to accept these orders. We had

1   scheduling conflicts around our ability to

2   coordinate on the field and required SOPs be

3   sent to change the dates.

4   MS. ANDERSON: So that was the last

5   one, right? We will break for 15 or 20

6   minutes.

7   (Recess.)

8   MR. DELLA TORRE: Before we begin

9   with the WorldCom questions, I would like to

10 give it over to HP, the New HP, to discuss AT&T

11 question number 32.

12   MR. MAY: If you remember the

13 question was to please identify the retest

14 quantities that were the basis for closing,

15 basically 2029 through -- exceptions, sorry,

16 2029 through 2037.

17   We had the quantities for all of

18 them but 2029 and the quantity for 2029 would

19 be zero instances out of a total of 1,670

20 original and supplemental LSRs.

21   MR. DELLA TORRE: Question 1,

22 WorldCom: Were all UDIT ASR orders submitted

23 via fax?

24   And the answer is no.

25   Question 2: Did the intentionally

1   erred transactions submitted in the POP

2   evaluation contain a single error or multiple

3   error conditions?

4   All our planned errors had single

5   error conditions.

6   However, there were situations of

7   unplanned error that contained multiple errors.

8   MS. OLIVER: Becky Oliver, WorldCom.

9   Was that per scope of the MTP or

10   just --

11   MR. WEEKS: Just the way we designed

12   it.

13   MR. DELLA TORRE: Yes, that is our

14   test design.

15   MS. OLIVER: Thank you.

16   MR. DELLA TORRE: Question 3: What

17   criteria did KPMG Consulting use to determine

18   which orders would be canceled or future dated

19   to avoid actual provisioning and which orders

20   would progress through physical provisioning?

21   As we discussed earlier, the only

22   orders that were future dated were the EELs

23   with LNP.

24   Question 4: Clarify how KPMG

25   Consulting completed a comparison between CLEC

1   production data and P-CLEC transaction data.

2   In this case we reviewed the P-CLEC

3   results that were captured through our

4   transaction testing with the Qwest produced

5   aggregate CLEC results reported in the PIDs.

6   Question 5: When did Qwest roll out

7   its IMA EDI implementation of LSOG 5 and over

8   what period of time did HPC develop and use its

9   IMA EDI interface?

10   I will refer this question to HPC.

11   MR. MAY: Geoff May with HPC. There

12   are essentially three questions here so I will

13   kind of take them one at a time.

14   When did Qwest roll out it's IMA EDI

15   implementation of LSOG 5? Qwest implemented

16   LSOG 5 in conjunction with IMA release 8.0 that

17   was implemented on August 19, 2001.

18   When did HP develop the various EDI

19   interfaces.

20   The P-CLEC developed and implemented

21   the following IMA EDI releases: 5.0, August

22   16, 2000, through February 8, 2001; 6.0,

23   December 4, 2000, through February 20, 2001.

24   That was a migration.

25   6.0 for new functionality December

1   4th, 2000 to April 4th, 2001.

2   The 7.0 release for volume testing

3   purposes, March 20th, 2001, through May 4th,

4   2001.

5   7.0 for Test 12 purposes, August

6   28th, 2001 through October 8, 2001.

7   And 8.0 for volume test purposes,

8   August 21st, 2001 through September 18th, 2001.

9   And part 3. When did we use the

10   interfaces. The P-CLEC used the IMA EDI 6.0

11   interface from April 12, 2001, to October 5th,

12   2001.

13   The P-CLEC used the IMA EDI 7.0

14   interface from October the 8th, 2001, to April

15   30th, 2002.

16   MR. DELLA TORRE: Geoff, why don't

17   we move to question 7, as well, while we are on

18   this subject.

19   MR. MAY: Similar. This one just

20   has two parts. When did Qwest roll out its IMA

21   GUI implementation of LSOG 5.

22   The answer to that is Qwest

23   implemented LSOG 5 GUI in conjunction with the

24   IMA release 8.0 that was implemented on August

25   20th, 2001.

1   Over what period of time did HPC, as

2   the P-CLEC, use its IMA GUI interface?

3   The P-CLEC used the IMA GUI 6.0

4   interface from April 12th, 2001, through April

5   22nd, 2001.

6   The P-CLEC used the IMA GUI 7.0

7   interface from April 23rd, 2001, through August

8   20th, 2001.

9   The P-CLEC used the IMA GUI 8.0

10   interface from August 21st, 2001, to February

11   24th, 2002.

12   MS. OLIVER: Becky Oliver, WorldCom.

13   Follow-up questions for

14   clarification.

15   Did, to confirm, HP used EDI IMA

16   version 8.0 which is implementation of LSOG 5

17   just for volume testing rather than

18   functionality testing.

19   MR. MAY: EDI or GUI?

20   MS. OLIVER: I was going to ask the

21   same for GUI.

22   MR. MAY: That was EDI?

23   MS. OLIVER: This is asking about

24   EDI.

25   MR. MAY: It's a correct statement

1   we used 8.0 only for volume testing with one

2   exception, which was an LNP scenario that

3   involved a participating CLEC, for one

4   participating CLEC.

5   MS. OLIVER: And for the GUI, 8.0?

6   MR. MAY: The GUI 8.0 was used in

7   Test 12, feature functionality testing. If you

8   want the date, we will repeat it.

9   MS. OLIVER: That is not necessary.

10   Can you please describe what was

11   reason for that?

12   MR. MAY: All of these decisions

13   were discussed in project managers meetings as

14   to whether or not the P-CLEC should migrate to

15   version 8.0 for feature function testing.

16   Decision was made maybe even by the steering

17   committee as to whether we would go to 8.0 and

18   the decision was only for volume on 8.0.

19   MS. ANDERSON: Yes, we had an

20   impasse on that and it was resolved by the

21   steering committee.

22   MS. OLIVER: That addressed why 8.0

23   was used for functionality via the GUI and not

24   via EDI?

25   MS. ANDERSON: Not exactly.

1   MR. MAY: I am sorry.

2   MS. ANDERSON: Go ahead.

3   MR. MAY: In part that is because

4   you know the GUI releases a flash cut. So

5   there was no alternative. That played a part

6   in that.

7   MS. OLIVER: That's okay. Thank you.

8   MR. MAY: You are welcome.

9   MR. DELLA TORRE: I will address

10   questions 6 and 8 together as they are the same

11   question, one referencing EDI and one GUI.

12   If the P-CLEC submitted standalone

13   pre-order queries specify when and how it was

14   determined that an IMA EDI pre-order query

15   should be run to validate customer information.

16   And we interpreted the question to

17   be getting to the issue of standalone

18   pre-orders versus integrated pre-orders that we

19   explained earlier.

20   The types of pre-orders and when

21   they would be run was articulated in the MTP

22   and Appendices D and K. And the choice to use

23   integrated for particular test cases was by

24   test design from the MTP for both EDI and GUI.

25   Question 9. Did KPMG Consulting

1   evaluation that Qwest's systems provide

2   required pre-order functionality including an

3   assessment of Qwest's systems compliance to OBF

4   pre-ordering guidelines?

5   And we will again defer this

6   question to HP.

7   MR. MAY: This particular assessment

8   actually would be contained in HP's final

9   report, appendices B and C, which we had

10 discussed briefly earlier in response to a

11 question AT&T had.

12   So, I guess, even though the

13 question is directed to KPMG if we were to

14 direct it to HP, the question would be yes. I

15 mean the answer.

16   MS. OLIVER: Becky Oliver, WorldCom.

17   So HP is confirming that they did

18 do -- HP did do some type of evaluation of

19 Qwest systems adherence to pre-ordering OBF

20 guidelines?

21   MR. MAY: Not their systems per se

22 but their documentation and adherence to OBF.

23   MS. OLIVER: Okay. Thank you.

24   MR. DELLA TORRE: Question 10. Do

25 the 4,058 IMA GUI pre-order transactions

1 correlate to 4,058 separate customer accounts?

2   If not, approximately how many

3 individual customer accounts were accessed for

4 IMA GUI pre-order queries?

5   And it is not a one-to-one

6 relationship. We submitted approximately 1,000

7 different GUI accounts or JASCs is the acronym

8 we use internally to HP for both pre-order and

9 order GUI activity.

10   Question 11. Similar question but

11 for EDI. And the response is the same, the

12 number of EDI JASCs or accounts were

13 approximately 5,000.

14   Question 12: Are the 490 P-CLEC

15 LSRs submitted via the IMA GUI which KPMG

16 determined to have received expected order

17 responses original version orders so that

18 received responses were original responses?

19   Our reading of this question was the

20 original meant the first order rather than the

21 supplement. And in fact, we did have

22 transactions with planned supplements and some

23 that were just the original LSR.

24   In both cases we received the

25 responses that were expected.

1   Question 13: What level of analysis

2   was completed to conclude that for the 490

3   P-CLEC LSRs submitted via the IMA GUI

4   interface, all LSRs received the expected

5   response? Specifically, did KPMG Consulting

6   analyze the content of the LSR responses (such

7   as verifying the correct due dates and

8   verifying the correct reject code)?

9   And we will defer this question, we

10   will defer to HP.

11   (Pause.)

12   MR. DELLA TORRE: To be specific in

13   response to this question, KPMG Consulting did

14   not analyze the response content. It was our

15   understanding that HP was doing that validation

16   so I will refer this to HP.

17   MR. MAY: Taking the question as

18   directed to HP, we did validate the content of

19   the LSR responses.

20   MR. DELLA TORRE: Question 14.

21   Specify what is the scope of the following KPMG

22   evaluation criteria: Qwest provides expected

23   order responses for LSRs submitted via IMA GUI.

24   Specifically, does this evaluation include all

25   order responses for each LSR through the

1 order's complete life cycle?

2   And the answer is no. We were

3 looking for a response, this was FOC in error,

4 I believe, is that the criterion? For this

5 particular criterion we were looking for the

6 appropriate FOC order error. We did not track

7 it through to completion for this particular

8 criteria.

9   MS. OLIVER: Becky Oliver, WorldCom.

10   I would like to go back one to

11 question 13 and ask if HP can provide a lower

12 level of granularity in the response that was

13 provided that HP validated the content of the

14 LSR responses.

15   Can it be specified which data

16 elements were validated which led to this

17 overall conclusion that the expected responses

18 were received?

19   (Pause.)

20   MR. MAY: The specific validation or

21 verification would depend on the response type.

22 There's at least six different types of

23 responses. We evaluated the responses as it

24 pertained to the order, i.e., test instance

25 required.

 1   MS. OLIVER: So would it be a fair

 2   assessment or statement that all primary

 3   aspects of the order response were validated?

 4   I mean, was there anything that HP, say for

 5   example on a FOC, that you just looked for one

 6   data element such as the due date and didn't

 7   pay attention to some other aspects?

 8   MR. MAY: No. We would have looked

 9   at all the relevant --

10   MS. OLIVER: Okay.

11   MR. MAY: Of course, Becky, if there

12   was a problem, we would have raised it in an

13   observation and exception, and/or an exception.

14   MS. OLIVER: Thank you.

15   MR. MAY: You are welcome.

16   MS. OLIVER: I did actually have a

17   follow up on question 14, please.

18   I understood that there was a

19   distinction made for this particular criteria,

20   that the order responses be considered or

21   looked for, whether FOC or a reject.

22   And I guess I am wondering or

23   looking for an explanation of this evaluation

24   criteria stated expected order responses for

25   LSRs. So, I just heard there are six different

1 types of order responses.

2   Why did this criteria just include

3 the FOC or reject?

4   MR. DELLA TORRE: We have other

5 criteria that assess the FAs or functional

6 acknowledgments. We also have criteria that

7 assess the SOCs or service order confirmations.

8 The SOC specifically is 12-10-1.

9   So in this particular case we were

10 looking to see if the LSR was properly

11 confirmed or rejected.

12   There are other criteria to see if

13 it were acknowledged or completed.

14   MS. OLIVER: Okay.

15   MR. DELLA TORRE: Question 15 is the

16 same as question 13, but it is the EDI

17 interface.

18   The question asks did KPMG

19 Consulting analyze the content of the LSR

20 responses.

21   And we did not. It was our

22 understanding of the roles and responsibilities

23 that that was HP. So I will defer question 15

24 to HP.

25   MR. MAY: Our answer would be the

1   same as the previous question, number 13.

2   MR. DELLA TORRE: In fact, for much

3   less drama, question 16, our answer is the same

4   as 14. EDI versus GUI is the distinction.

5   So question 17: How was the sample

6   size of 150 LSRs determined?

7   This is a question that was answered

8   in AT&T's section. There were 50 resale, 50

9   UNE-P and 50 UNE-L.

10   Question 18. Why was the time of

11 receipt for SOCs received via the GUI interface

12 not available to KPMG.

13   This was also discussed earlier,

14 that it was a date, not a time.

15   Question 19. What analysis did KPMG

16 conduct regarding the timeliness of receiving

17 work completion notifications via the GUI to

18 conclude that Qwest systems or representatives

19 provide timely work completion notifications in

20 response to LSRs submitted via the IMA GUI.

21   And I believe this was also

22 discussed earlier.

23   Question 20: Why was the time of

24 receipt of SOC received via the EDI interface

25 not available.

1   In fact, this is a mistake that will

2   be revised in the final report also as

3   discussed during the AT&T section.

4   Question 21: Specify from what

5   event trigger the average response time of 262

6   minutes for receipt of work completion notices

7   was calculated.

8   This result was obtained by using

9   the formula for calculating PO6-B PID per

10 Qwest's PID documentation.

11   The specific data elements used to

12 calculate it are SOC receipt date and time and

13 the date and time of the completion of the last

14 internal Qwest service order associated with

15 that POM.

16   Question 22. Why was the time of

17 the receipt of BCN data received by the P-CLEC

18 via the GUI and EDI interfaces not available?

19   As discussed earlier GUI remains

20 unavailable, but EDI will be reflected for the

21 PO7-B PID in the final report.

22   Question 23: Define the use of

23 comparable in following -- in the following

24 KPMG finding: Qwest's product and feature

25 offering for resale and UNE-P were reviewed and

1   found to be comparable with retail?

2   The word comparable is used to

3   describe functionality available both from the

4   wholesale and retail perspectives regarding

5   product and feature offerings.

6   Of course allowing for differences

7   in the names of the products, groupings, the

8   fact that the interfaces by design are

9   different.

10   Question 25: Specify which

11   pre-ordering transactions were used by KPMG

12   Consulting in its functionality comparison

13   between wholesale and retail pre-order and

14   order capabilities.

15   The pre-order transactions used in

16   this comparison were those required to submit

17   an order for the products and features listed

18   in the evaluation criterion, specifically,

19   validate customer address or AVQ. Obtain

20   customer service record, CSR. Reserve

21   telephone numbers which is both the TNAQ and

22   TNSQ. Determine product and feature

23   availability or the SAQ. Perform facility

24   availability check, FAQ. Schedule appointment

25   AAQ and ASQ. Obtain loop qualification

 1 information, RLDQ and cancel an appointment or

 2 reserve TN, the CTQ.

 3   MS. OLIVER: I didn't hear -- Becky

 4 Oliver, WorldCom.

 5   Did we skip question 24?

 6   MR. DELLA TORRE: No, that was the

 7 discussion of the notion of comparable.

 8   MS. OLIVER: Right. 24 is asking if

 9 KPMG made --

10   MR. DELLA TORRE: Oh, my apologies.

11   MS. OLIVER: -- related comparable

12 evaluation on the UNE aspect.

13   MR. DELLA TORRE: My apologies, I

14 skipped it inadvertently.

15   As there is no retail product, that

16 we believe is the equivalent on the retail side

17 of a UNE, we did not do a retail comparability

18 assessment of UNE products.

19   For supplemental information on

20 question 25, there were pre-order types for

21 which we felt there were no retail analog and,

22 therefore, were not in the scope of the test.

23 That includes the validate customer CFA or

24 CFAQ. Obtain directory listing information for

25 an existing UNE-L customer. Obtain design

1   layout record or the validate (inaudible) MPQ .

2   We will move forward with the

3   Montana questions.

4   Question number 1 relates to PID

5   PO-10 which we discussed earlier, where there

6   are three different sets of numbers 418

7   originally, 51 subsequently, and then zero, in

8   fact, that were lost orders and they did

9   receive subsequent responses of one type or

10   another.

11   Question number 2: Table 12-7, Test

12   Cross Reference 12-11-3, paragraph 4, pre-order

13   and order capabilities. Please identify in

14   which exception(s) or observation(s) KPMG

15   Consulting formally raised the issue of Qwest's

16   adherence to due date expedites.

17   And that was observation 3106.

18   Moving with Oregon questions. Table

19   12-8-2. What was the result of the

20   functionality evaluation?

21   And in this particular case the

22   participating CLEC was able to successfully

23   order and have viewed its provision in all

24   three regions.

25   That would be subsumed in evaluation

1 criteria 12-5-1.

2   MR. EMMONS: I have one follow up.

3   MS. ANDERSON: Please pass the mic

4 back.

5   MR. EMMONS: Irv Emmons, Oregon PUC

6 staff.

7   (Inaudible) whenever there was an

8 unable to determine as KPMG Consulting result

9 or inconclusive, and in order to go back and

10 justify that as a result, shouldn't it also

11 have that type of statement in there? The way

12 this one ended was the functionality and you

13 have given an explanation of a result of that,

14 which since you brought that up would be

15 appropriate and because of your sample size not

16 being sufficient should it have that statement

17 at the end?

18   MR. DELLA TORRE: This is actually

19 the criteria that's being removed from the

20 discussion we had earlier where units were

21 inappropriately kept in the test as a trunk

22 issue and we really should remove it entirely.

23 So that will be removed entirely.

24   MR. EMMONS: That is satisfactory.

25 Thank you.

1   MR. DELLA TORRE: And the second

2   question from Oregon refers to table 12-9-6.

3   The discussion on parity in the Western Region.

4   Is there a typo? Why is there a conflicting

5   result in a statistical test when both test and

6   retail are at 8 percent.

7   And in fact this is not a typo.

8   Even though both were 8 percent, the dual

9   statistical test result came out with a

10 conflicting result. It is likely, in fact, the

11 small sample size from the Western Region that

12 is the main factor in determining that

13 conflicting result.

14   MR. EMMONS: This is Irv Emmons

15 again. Then it should I think be stated as

16 such so it clarifies that part of it.

17   A VOICE: It's the dual test.

18   MR. WEEKS: Right. And so the

19 suggestion is refer to the dual test, because

20 it looks on the face like the numbers are the

21 same.

22   MR. EMMONS: That just clarifies that

23 part of it.

24   MR. DELLA TORRE: Okay. Let's take

25 a look at that criterion.

1   (Pause.)

2   MR. WEEKS: Actually, the very last

3   paragraph refers to that.

4   MR. DELLA TORRE: That the dual test

5   resulted in a conflicting test result for the

6   Western Region and that this issue was brought

7   before the TAG.

8   MR. WEEKS: It's already in the

9   report I think, unless you would like us to

10   clarify it further.

11   MR. DELLA TORRE: The very last

12   paragraph.

13   MR. EMMONS: I understand. That was

14   brought up by another staff member. She is not

15   on the conference. I don't hear her. We will

16   go ahead and accept that.

17   MR. WEEKS: Okay.

18   MR. DELLA TORRE: Thank you.

19   MR. WEEKS: If you find out later

20   that, you know, you guys have a different

21   opinion, just get back to us.

22   MR. EMMONS: Okay.

23   MR. DELLA TORRE: There are a few

24   questions that we are prepared to answer that

25   were HPC referrals to us. However, there was

1   an unnecessary level of confusion caused

2   yesterday. So we will wait until those

3   questions are reached during HP's section.

4   However, I think it is appropriate

5   to go through a few supplemental questions that

6   were provided to us by, I believe we have --

7   from AT&T for Test 12.7 which was covered in

8   previous ECCs.

9   Question number 1 is please explain

10   the basis for the KPMG Consulting report

11   information about the retail loop qualification

12   process.

13   And if by that the basis means how

14   we drew our conclusions, we would refer you to

15   the section titled evaluation Methods and also

16   analysis Methods, where we detail or indicate

17   that we conducted Qwest -- reviewed Qwest

18   documentation, we conducted interviews with

19   Qwest personnel and we conducted on-site

20   observations of the retail loop qualification

21   process.

22   The second question for Test 12.7:

23   In which Qwest work center are retail end user

24   trouble calls answered when those trouble calls

25   deal with difficulties being experienced with

1   the Web-site tool?

2   In fact, this was, the Web-site tool

3   was not part of our assessment and beyond the

4   scope of the parity test, 12.7.

5   MR. CONNOLLY: But you do mention

6   the retail tool in your report. Isn't is that

7   correct, the retail GUI?

8   MR. DELLA TORRE: We will have to

9   get back to you on that because we don't have

10   the information prepared. We thought our

11   answer would suffice and we don't have the

12   ability to follow up on that.

13   Could you repeat the question?

14   MR. CONNOLLY: I was curious because

15   as I read 12.7 there is a discussion about the

16   retail tool. So --

17   (Telephone interruption.)

18   MR. WEEKS: We were comparing the

19   functionality of the tools. The question as to

20   if you have a problem with that tool what work

21   center do you phone in your trouble calls to.

22   I don't know that that was necessarily a part

23   of what we looked at.

24   MR. CONNOLLY: Well, let me go back

25   to our first question.

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 1              MR. WEEKS:  Okay.

 2              MR. CONNOLLY:  And your answer to

 3    our question was that you looked at Qwest

 4    documentation, interviewed Qwest personnel and

 5    you observed Qwest employees at work centers.

 6              MR. WEEKS:  Using the retail tool.

 7              MR. CONNOLLY:  Performing the retail

 8    queries.

 9              MR. WEEKS:  Right.

10              MR. CONNOLLY:  Did you look at all

11    at any use of their GUI that is used by retail

12    end users to perform --

13              MR. DELLA TORRE:  No, we did not.

14              MR. WEEKS:  We would not have done

15    that because that is not a retail function

16    per se.

17              MR. CONNOLLY:  That is where my

18    confusion comes up, the next question covered

19    in your report --

20              MR. WEEKS:  We made reference, I

21    don't know what we did to evaluate it.  We will

22    need to look at it and get back to you.

23              MR. CONNOLLY:  And with that

24    evaluation if you found out how do users of

25    that GUI get their questions answered relative
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1   to connectivity --

2   MR. WEEKS: I now understand the

3   question. I don't know the answer. We will

4   figure it out and come back to you.

5   MR. CONNOLLY: Thank you for that.

6   MR. DELLA TORRE: I believe at this

7   point the KPMG Test 12 section is concluded.

8   There is a follow-up from HP on a previous

9   question, I believe.

10   MR. MAY: Yes. Geoff May from HP.

11   On WorldCom question number 13, in response to

12   Becky's follow up, there are actually four

13   e-mail response types. Those would be the FOC,

14   LSR reject, LSR error and an LSR jeopardy. I

15   think I misspoke and said there may be six. We

16   just wanted to clarify that. Thank you.

17   MR. DELLA TORRE: I believe the next

18   item on the agenda is the HP portion for Test

19   12.

20   MR. MAY: Geoff May with HP. I will

21   refer you to, actually I will start with the

22   Washington state PUC questions.

23   There were no state-specific HP Test

24   12 results and all HP observations and

25   exceptions have been closed resolved.

1   And beginning now with Test 12 A,

2   AT&T Question number 1.

3   Question 1: HPC reports pre-order

4   transactions enable the CLEC to obtain

5   information necessary for the preparation of

6   orders and prevent delays when processing local

7   service requests.

8   Please describe the processing

9   delays that can be prevented by using pre-order

10   transactions.

11   Qwest provides its pre-ordering

12   overview, version 9.0, on its wholesale web

13   site. The overview describes how the pre-order

14   function prevents ordering transaction delays.

15   MR. CONNOLLY: Tim Connelly on

16   follow-up.

17   When I read your 12 A, in this

18   particular paragraph 2.1, business Process

19   Descriptions, you say what you say in that

20   paragraph. We will try to understand what you

21   mean by pre-order transactions, prevent delays

22   in processing.

23   MR. MAY: Could I give you an

24   example or two?

25   MR. CONNOLLY: However many it

1   takes.

2   MR. MAY: Okay. One example would

3   be an address validation which allows a CLEC to

4   verify that an address for its end-user matches

5   the address for the location within Qwest's

6   database.

7   If Qwest is unable to match the

8   CLEC's end-user address to a single service

9   address, the request may be rejected.

10   MR. CONNOLLY: So the reject

11 process --

12   MR. MAY: Would cause a delay.

13   MR. CONNOLLY: A delay avoidable by

14 having conducted that address validation?

15   MR. MAY: Correct. Want another

16 one?

17   MR. CONNOLLY: Sure.

18   MR. MAY: The CSR allows a CLEC to

19 view the service provided by Qwest. This helps

20 the CLEC to order the services its end-user

21 requests.

22   An example there would be the USOCs

23 may have the same function at the end-user's

24 premise, but because of the service provided,

25 the USOC may be different.

1   Further example would be a Centrex

2 product versus a POTS product.

3   MR. FINNEGAN: This is John Finnegan

4 again with a follow-up. The initial response

5 to this question, you referred us to the Qwest

6 web site. It sounds like, well, it's unclear.

7 Is this a statement where you are repeating an

8 assertion by Qwest?

9   MR. MAY: Yes.

10   MR. FINNEGAN: Or is this a

11 statement it was HP's experience in the test

12 that delays were prevented?

13   MR. MAY: Both.

14   Okay. AT&T 12 A Question 2: Please

15 indicate the types of transactions that are

16 "service Order Completions."

17   The service order completions, SOCs,

18 noted in HPC 12 A report and D report pertain

19 to the provisioning completion notifications

20 received via EDI 865 or the completion reports.

21   In response to a AT&T clarification

22 question regarding billing completion

23 notifications BCNs Qwest only provides BCNs via

24 the status update process.

25   AT&T number 3. HPC's iteration of

1 the pre-order transaction types is inconsistent

2 with KPMG's Table 12-1 and its report on test

3 cross-reference 12-2-1.

4   Which pre-order queries were

5 submitted to in Test 12.

6   HPC reviewed both sections and has

7 determined that the differences pertain to word

8 choices. HPC plans to update its report, Table

9 12 A-1.2, P-CLEC pre-order/order transactions

10 to include the acronym for each transaction

11 type. I think we had a question similar to

12 this where Joe (inaudible) gave a similar

13 explanation.

14   Question 4: HPC reports the address

15 validation function enables a CLEC to march a

16 customer address provided by the CLEC to an

17 address in Qwest's OSS.

18   Which Qwest OSS databases is queried

19 for address validation?

20 And given the black box nature of

21 the P-CLEC's activities we would defer this

22 question to KPMG for their experience or

23 knowledge in this area.

24   MR. DELLA TORRE: We believe the

25 answer to this is PREMIS, however, we would

1   defer to Qwest to confirm that belief.

2   MR. VIVEROS: Qwest confirms that.

3   MR. DELLA TORRE: For those on the

4   bridge Qwest did confirm that it is in fact

5   PREMIS.

6   MR. MAY: Question 5. Which Qwest

7   database or databases is queried for facility

8   availability.

9   Similarly we would defer to KPMG or

10 Qwest.

11   MR. DELLA TORRE: Again, we believe

12 that system is LFAX. However we will defer to

13 Qwest.

14   MR. VIVEROS: We agree.

15   MR. DELLA TORRE: They agree to that

16 as well.

17   MR. MAY: Question 6: For LSRs that

18 are rejected for invalid USOCs is the

19 determination of validity based on CLEC

20 contract and state criteria?

21   The answer is yes. HP's exception

22 2007 provides the details regarding the

23 P-CLEC's experiences with USOC processing.

24   Question 7: Please explain how the

25 unlimited IMA response provides any solution to

1   the fact that Qwest's systems limit the

2   responses to the first ten meet points in a

3   specified range.

4   The statements are quoted from

5   Qwest's documentation. The test only had four

6   meet points and never exceeded ten meet points.

7   Question --

8   MR. CONNOLLY: Excuse me, Geoff.

9   Can you tell me in Section 2.1.10, (inaudible)

10   query around which sentences should I put Qwest

11   quotation marks?

12   MR. MAY: I am informed that it

13   wasn't a direct quote, it was a paraphrase.

14   Question number 6. For LSR are that

15   are rejected for invalid -- I apologize.

16   Number 7.

17   Number 8. Sorry.

18   Please describe the Qwest OSS

19   interface that HPC used that enables CLECs to,

20   quote, dial up and log on to Qwest's ordering

21   systems from local computers, end quote.

22   The P-CLEC tested dial up access to

23   Qwest's IMA GUI system using secure ID tokens.

24   MR. CONNOLLY: So does that sentence

25   misstate the nature of the access to the

1 ordering systems? Did you say dial up into

2 IMA?

3   MR. MAY: GUI.

4   MR. CONNOLLY: IMA GUI and you don't

5 have access to Qwest's ordering systems without

6 going through the IMA GUI?

7   MR. MAY: That's correct, I believe.

8   MR. CONNOLLY: Then, I think, if you

9 take a look at the sentence, you will see how I

10 might be confused when you say that a CLEC can

11 dial up and log on to Qwest's ordering systems

12 from local computers --

13   MR. MAY: Oh, okay. I would accept

14 an edit on that statement. I follow. We will

15 modify that.

16   Okay. Question number 9. What is

17 the basis for HPC's report statement, quote,

18 "TELIS allows CLECs to electronically submit

19 access service requests to order

20 interconnection trunking and facilities between

21 it and Qwest."

22   The statement originates from

23 Qwest's web site. HPC did not process

24 transactions of this type as indicated in the

25 footnote of the report.

1   MR. CONNOLLY: So should we put that

2   statement in quotation marks representing a

3   direct quote from Qwest's web site?

4   MR. MAY: This also was a

5   paraphrase.

6   Question number 10: Please explain

7   HPC's statement, quote, EDI uses clearly

8   specified fields and formatting.

9   What is the method employed by Qwest

10   IMA EDI to make these clear?

11   The standards for EDI that are

12   developed by the American National Standards

13   Institute's Accredited Standards Committee X-12

14   clearly and explicitly defines location,

15   repetition, format and content of each data

16   element in the standard.

17   Qwest's IMA EDI implementation

18   builds upon these standards and industry

19   guidelines developed by the Telecommunications

20   Industry Forum.

21   MR. CONNOLLY: Excuse me. So

22   Qwest's guidelines are as clear as the industry

23   guidelines?

24   MR. MAY: Yes.

25   MR. CONNOLLY: Thanks.

1   MR. MAY: Question number 11:

2   Please explain the HPC statement IMA GUI does

3   not require the CLEC to develop its own

4   interface.

5   Qwest's IMA GUI system allows CLECs

6   to perform pre-order, order, and post-order

7   functions using a Qwest developed application.

8   A CLEC can obtain and install the publicly

9   available software to access Qwest's IMA GUI

10   system.

11   Access is provided via several

12   communication paths, hence IMA GUI does not

13   require a CLEC to develop its own interface.

14   MR. CONNOLLY: Are you excluding

15   these Telecom requirements from your

16   determination or definition of interface?

17   MR. MAY: Are you talking about

18   entrance facilities?

19   MR. CONNOLLY: What I heard you say

20   was a CLEC has a choice of telecommunication

21   arrangements with which to connect through this

22   interface.

23   MR. MAY: For example, phone line.

24   MR. CONNOLLY: Phone line, T-1,

25   whatever. You said that there were several.

1   What I am trying to understand is,

2   do you consider that not part of the interface?

3   MR. MAY: That's correct, we are

4   excluding it from the interface.

5   MR. CONNOLLY: Absent those Telecom

6   facilities, is there any way for this interface

7   to connect to Qwest?

8   MR. MAY: No.

9   MR. CONNOLLY: I am just trying to

10   understand what their terminology is here.

11   MR. CRAIN: Can I get a

12   clarification?

13   You are asking whether or not the

14   interface connects with Qwest, or the interface

15   would then be connected to the CLEC?

16   MR. MAY: I guess the statement -- I

17   am sorry.

18   MR. CRAIN: And Tim, are you talking

19   about the telecommunications requirements

20   between interface and CLEC or between part of

21   the interface and Qwest?

22   MR. CONNOLLY: I'm trying to

23   understand HP's statement --

24   MR. CRAIN: I don't understand your

25   question.

1   MR. CONNOLLY: Since I am asking HP

2   the question, with all due respect, it's more

3   important for them to understand my question.

4   The answer we can probably address in Andy's

5   question.

6   MS. ANDERSON: Could I maybe

7   interrupt here. I think, please correct me if

8   I am wrong, I think what you were trying to say

9   is there is no software application development

10   required for the CLEC to connect to that. Yes,

11   they do have to order a phone line and might

12   have to get a T-1 or whatever, but I think it's

13   the application development that they were

14   getting at.

15   MR. MAY: We would concur with that

16   explanation.

17   MR. CONNOLLY: That would be the

18   sort of language modification we might see in

19   this report to straighten this out?

20   MR. MAY: We can take that back,

21   take a close look at that, see if we can make

22   that more clear.

23   MR. CONNOLLY: Thanks.

24   MR. MAY: Okay.

25   Question 12: Please explain the

1   methods and means the loss and completion

2   reports are provided to CLECs that provide

3   Qwest with manual orders via fax.

4   Loss and completion reports are

5   available to CLECs via facsimile, and then

6   there are electronic transfer options which

7   include MDM, a dedicated circuit, MDM dial up

8   and the web.

9   The Qwest web site provides

10 additional information.

11   Question 13: Please confirm the

12 that the term normal order flow and its

13 explanation in this section is the same as that

14 used by Qwest and is provided to CLECs in the

15 IMA EDI implementation guidelines.

16   Confirmed. The term, quote, "normal

17 order flow," end quote, and its explanation is

18 an HPC paraphrase of the explanation provided

19 in the Qwest IMA 8.0 disclosure, Appendix I,

20 generic order flow business model.

21   MR. CONNOLLY: When I looked at that

22 web site I saw the words normal order flow. Is

23 that what it says?

24   MR. MAY: Same term, yes. We are

25 confirming, the question asks us to confirm,

1   and we are confirming. We are agreeing.

2   MR. CONNOLLY: You agreed, but you

3   said your term is a paraphrasing of the Qwest

4   term. I read the Qwest term to be normal order

5   flow.

6   MR. MAY: It's the explanation, not

7   the term normal order flow, that is a

8   paraphrase.

9   MR. CONNOLLY: So normal doesn't

10   mean normal as you experienced it, normal means

11   whatever Qwest means by normal?

12   MR. MAY: Correct.

13   MR. CONNOLLY: Thanks.

14   MR. MAY: Question number 14:

15   Please confirm that the term, quote, "exception

16   order flow," end quote, and its explanation in

17   this section is the same as that used by Qwest

18   and is provided to CLECs in the IMA and EDI

19   implementation guidelines.

20   Similarly confirmed. Again,

21   Appendix I, generic order flow, business model

22   of the IMA 8.0 disclosure document.

23   MR. FINNEGAN: John Finnegan. A

24   quick follow-up question.

25   In that chart is there any reason

1   why the 997 functional acknowledgments were not

2   on the chart? It did appear on the normal

3   order flow chart but they did not on the

4   exception or supplemental. Figure 12 A-1.2 and

5   12 A-1.3.

6   MR. WEEKS: Wendie has a comment or

7   question.

8   MS. ALLSTOT: Wendie Allstot,

9   Colorado.

10   I actually pulled that off of

11 Qwest's web site, because I had some questions

12 as to what HP had in its report. That is not

13 included on the web site diagram.

14   MR. MAY: We concur with that.

15 That's correct. Thank you, Wendie.

16   Question 15: Please provide the

17 basis of HPC's knowledge of quote, "Central

18 Office embargoes," end quote, and processing

19 methods used by Qwest under these

20 circumstances.

21   This statement is quoted from Qwest

22 IMA EDI disclosure documentation. The P-CLEC

23 did not experience any CO embargoes during the

24 test.

25   Question number 16: Please describe

1   the disposition of LSRs received by Qwest when

2   it imposes a central office embargo.

3   Again, this statement is quoted from

4   Qwest's IMA EDI disclosure documentation and

5   P-CLEC did not experience any CO embagoes

6   during the test.

7   Question 17 --

8   MR. CONNOLLY: Geoff, the question

9   was, if you know, if an order is issued, an LSR

10 is issued during a Central Office embargo, do

11 you know what happens to it?

12   MR. MAY: The P-CLEC has no

13 experience with the Central Office embargo.

14   MR. CONNOLLY: Sounds like I don't

15 know.

16   MS. ANDERSON: Is it something Qwest

17 could quickly answer?

18   MS. KING: Beth King with Qwest.

19   If you have a Central Office embargo

20 you would get a reject on your order. That is

21 explained on the Qwest web site.

22   MS. ANDERSON: Thanks.

23   MR. MAY: Question 17: Please

24 describe the processing of retail orders

25 submitted by Qwest representatives during a

1 Central Office embargo.

2   The answer is the same. We don't

3 know.

4   MR. FINNEGAN: Did you identify your

5 last name?

6   MS. KING: It's King.

7   MR. FINNEGAN: I am sorry.

8   MR. CONNOLLY: Does Qwest have an

9 answer to 17, please?

10   MR. MAY: Please describe the

11 processing of retail orders submitted by Qwest

12 representatives during a Central Office

13 embargo.

14   MR. VIVEROS: In a retail

15 environment, since the customer is not

16 submitting a request, there is an equivalent

17 reject.

18   Basically with the end-user customer

19 on the phone the service rep would explain they

20 could not have service because that particular

21 central office doesn't have the availability to

22 make changes.

23   My understanding is that we would,

24 depending on the type of embargo it was,

25 certainly, in the case where we are talking

1   about a CO embargo associated with the sale of

2   the CO, I believe time frames are communicated

3   to the customer so the customer can get service

4   after the embargo is completed.

5   MR. MAY: Question 18: Please

6   explain the reasons in the case of a manually

7   generated fatal error that a CLEC cannot submit

8   a corrected LSR with a new PON and it must,

9   quote, "submit a corrected LSR with the

10   original PON and an incremental version

11   number," end quote.

12   The term exception (inaudible) and

13   its explanation is a (inaudible) paraphrase of

14   the explanation provided in the Qwest IMA 8.0

15   disclosure Appendix I, generic order flow

16   business model.

17   We would defer that one to Qwest as

18   well.

19   MR. CONNOLLY: Well, in your, in

20   this paragraph on my page 12-A6 the last

21   sentence of the second full paragraph on that

22   page says, manually generated fatal errors

23   require that the CLEC submit a corrected LSR

24   with the original PON and an incremented

25   version of it.

1   Are you saying that is not your,

2   HP's, understanding, but it's Qwest's

3   understanding, or Qwest's statement that you

4   paraphrased?

5   MR. MAY: This is a paraphrase of

6   information on Qwest's web site. In the

7   disclosure documentation. I apologize.

8   MR. CONNOLLY: Chris, would you know

9   the answer to that, AT&T's question 18.

10   MR. VIVEROS: The issue really has

11   to do with how the LSR has been recorded and

12   stored in our databases. Where the system has

13   mechanically detected an error, rejected it

14   back to the CLEC -- we would expect that the

15   CLEC would use the same PON.

16   But they certainly have the option

17   of using a brand new purchase order number.

18   The original PON in our database

19   would be in a state of a final disposition if

20   it was fatally rejected by our system.

21   In the case of a manually generated

22   fatal error that LSR has passed through our

23   systems, been accepted and registered as a live

24   LSR in our databases.

25   And then our service center has done

1 further validation, found an error, generated a

2 reject message.

3   Although we have updated the status

4 to reflect it was rejected, it's now sitting in

5 our databases and our strong preference is that

6 the CLEC use the same purchase order number so

7 that in fact there is a complete audit trail.

8   We obviously couldn't stop a CLEC

9 from sending in a separate order with a

10 different PON. As long as it was valid we

11 would process it.

12   MR. CONNOLLY: I guess what I am

13 understanding is that you pretty much agree

14 with HP's paraphrase, but it's not a

15 hundred percent?

16   MR. VIVEROS: Yes. We agree with

17 the paraphrase, that is reflective of what our

18 document says and the documentation on the web

19 site reflects our attempt to ensure that we

20 have got a complete and accurate audit trail

21 when in fact there is a situation where there

22 is a manually generated fatal reject.

23   MR. MAY: Okay. Question number 19:

24 Please explain whether the remarks containing

25 the ISC representative's correction to a

1 non-fatal error are provided automatically by

2 Qwest, by the Qwest system or whether they are

3 manually entered by the ISC representative.

4   And, you know, due to the black box

5 nature of the P-CLEC's activities we refer this

6 to KPMG.

7   MR. DELLA TORRE: And it is our

8 understanding that these comments are typed in

9 manually by the representative. However, we

10 would defer to Qwest for confirmation.

11 Mr. Viveros?

12   MR. VIVEROS: I apologize. Would

13 you repeat that, Joe?

14   MR. DELLA TORRE: Sure. The

15 question is whether the remarks are typed in by

16 an ISC manually or whether they are

17 automatically entered for fatal errors, or

18 non-fatal, my apologies.

19   MR. VIVEROS: All right.

20   MR. DELLA TORRE: And our

21 understanding is that those are typed in

22 manually by the rep for non-fatal error.

23   MR. VIVEROS: That is correct.

24   MR. MAY: Question 20: Please

25 confirm that the term, "supplemental order

1   flow" and its explanation in this section is

2   the same as that used by Qwest and is provided

3   to CLECs in the IMA EDI implementation

4   guidelines.

5   The term supplemental order flow and

6   its explanation is an HPC paraphrase of the

7   Qwest definition provided in the IMA 8.0

8   disclosure Appendix I generic order flow

9   business model.

10   Question 21: Please identify

11   materials received by the P-CLEC from Qwest

12   during the course of its Test 12 work that were

13   received in paper form, or on computer files

14   that P-CLEC did not download from the Qwest's,

15   from Qwest's web site.

16   Please explain the methods employed

17   by HPC to verify that each of the materials are

18   available to all CLECs.

19   The P-CLEC received several types of

20   materials directly directly from Qwest

21   account -- the Qwest account management team

22   members or designated Qwest representatives

23   including billing account numbers,

24   interconnection agreements, directory listing,

25   verification proofs, escalation lists, USOC

1 lists, communicators and/or notifications,

2 digital certificates, monthly performance

3 reports and responses to escalations or issues.

4   The P-CLEC always asked Qwest to

5 verify that the material provided was available

6 to any and all CLECs. Qwest always indicated

7 that any CLEC could obtain these materials.

8   Beyond that or however, due to the

9 black box nature of the P-CLEC test, HPC could

10 not verify this assumption.

11   Again, we would defer to KPMG if

12 they have any experience or knowledge in this

13 area.

14   MR. WEEKS: The answer is what Qwest

15 does or does not make available to other CLECs

16 other than what Qwest affirms to you that they

17 don't --

18   How can we read this last sentence

19 in that paragraph?

20   MR. MAY: We will revise that

21 sentence to read to state what I said in my

22 answer. We don't have any information that

23 would contradict what HPC said.

24   MR. CONNOLLY: Geoff, since you said

25 you don't know about what Qwest does or does

1   not make available to other CLECs other than

2   what Qwest affirmed to you that they don't, how

3   can we read this last sentence in that

4   paragraph?

5   I think you said you don't know that

6   Qwest does not make other information available

7   to other CLECs by the nature of the black box

8   testing.

9   This is the last sentence in the

10   paragraph that follows table 12 A-1.2.

11   MR. MAY: We will revise that

12   sentence to read, to state what I stated in my

13   answer, which was that -- describe, that we

14   asked Qwest and they told us. And beyond that

15   we can't verify.

16   Question 22: Identify which tests

17   were concluded -- which were conducted with

18   the 35,780 pre-order transaction responses

19   received by the P-CLEC.

20   P-CLEC submitted the 35,780

21   pre-order transactions in support of Test 12.

22   And test bed validation and verification to the

23   best of HP's knowledge.

24   Question --

25   MR. CONNOLLY: Do these include the

1   system availability pings?

2   MR. MAY: No.

3   Question number 23: HPC reports

4   that it identified issues with the completeness

5   of responses.

6   Notwithstanding the lists of

7   observations and exceptions, was the P-CLEC

8   evaluating the extent to which Qwest provided a

9   complete response to each query?

10   Did the P-CLEC determine that Qwest

11 provided a response to each query?

12   The P-CLEC reviewed the Qwest

13 responses to these types of orders and open

14 exceptions or observations if the response was

15 incomplete.

16   So I guess the answer is yes.

17   Moving to --

18   MS. ANDERSON: I am thinking that

19 unless there is any additional follow-up

20 questions that we take our lunch break now,

21 because we still have the WorldCom stuff to go

22 through for this section.

23   While we are out, they are going to

24 be working on the air conditioning. Absent

25 that, we will have fans when we come back. So

1   something new every time we let you out of the

2   room.

3   We'll reconvene as the agenda says

4   at 12:15 -- I am sorry. 1:15.

5   And you can go one block down to the

6   mall okay, 1:15. Thanks.

7   (Recessed at 12 o'clock noon to

8   reconvene at 1:15 p.m.)

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 1                   AFTERNOON PROCEEDINGS
 2               MS. ANDERSON:  Okay, folks.
 3               MR. DELLA TORRE:  All right, folks.  We're
 4      going to look to get started, if everyone can take
 5      their seats.
 6               MS. ANDERSON:  We had a couple of
 7      questions regarding the stopping payment attachment,
 8      and then we intend to continue through until we finish
 9      the questions on the agenda today, because tomorrow
10      we'll have a full day, and then we'll be breaking at
11      three for other things.  So, we're here for the
12      duration.
13               FROM THE AUDIENCE:  I wonder if the court
14      reporter is just finding that out now.
15               MS. ANDERSON:  That's why they've got two
16      or three of them, I guess.
17               With WorldCom not here -- here she is.
18      Never mind.  Ready to roll?
19               MR. MAY:  Tim, you indicated that you had
20      some follow-up questions, AT&T would, on 12A.
21               MR. CONNOLLY:  Yes, sir, Geoff, I do, on
22      12A.  If I could ask you to turn your attention to Test
23      Cross Reference 12-2-1, and your evaluation criteria
24      is, Qwest provides complete responses to CLEC preorder
25      transactions.  Correct me if I am wrong, you
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 1     established your expectations about what is a complete

 2     response, based on Qwest's documentation on their

 3     Website, and perhaps other Qwest documentation on the

 4     Website, what that told you to expect; is that correct?

 5                    MR. MAY:  Yes.

 6                    MR. CONNOLLY:  So, as we look at, for

 7     example, the preorder queries that are in the preorder

 8     transaction processing section, 2.1.1, for each one of

 9     those types of queries, did you establish a set of

10     expected fields, and the responses that you got, you

11     evaluated with the responses that you received against

12     that, the criteria for each of those?

13                    MR. MAY:  Yes, sir.

14                    MR. CONNOLLY:  Did you establish a set of

15     volume expectations where you said -- where you needed

16     to have a certain number of each of those types of

17     preorder query responses to establish that their --

18     Qwest's response was complete?

19                    MR. MAY:  No.  It was a functional

20     evaluation.  So the answer is, no.  It was a functional

21     evaluation.

22                    MR. CONNOLLY:  So, if you saw responses

23     that didn't comport with your expectations --

24                    MR. MAY:  We would issue --

25                    MR. CONNOLLY:  -- an observation or
```

1   exception?

2   MR. MAY: Correct.

3   MR. CONNOLLY: In those cases, where you

4   had some that were within expectations for a particular

5   query type, and others that were not, did that result

6   in an observation or an exception?

7   MS. MAY: Yes.

8   MR. CONNOLLY: So, in all cases that your

9   expectations were not satisfied, if you will, that

10   would have resulted in an observation or an exception?

11   MR. MAY: Yes.

12   MR. CONNOLLY: Is that true, also, for

13   Evaluation Criteria 12-3-1, where the subject is

14   complete responses for CLEC resale order and post-order

15   transactions.

16   MR. MAY: Yes.

17   MR. CONNOLLY: The comment in 12-3-1

18   isn't very clear as to how your findings support that

19   evaluation criteria. It reads, in part, "The CLEC used

20   Qwest-provided training and documentation to complete

21   IMA EDI, IMA GUI, and maybe order and post-order

22   transactions for resale products." Is that -- how

23   should I understand that comment, relative to your

24   evaluation work?

25   MR. MAY: Well, the nature of our

1   evaluation work would be to issue observations and

2   exceptions, where the results did not meet the

3   expectations, as we understood them, from Qwest's

4   wholesale documentation.

5   MR. CONNOLLY: Could you walk us through

6   what your evaluation -- let's take a resale migration

7   order. How did you evaluate that that worked?

8   MR. MAY: We evaluate the responses,

9   based on our understanding of what is supposed to

10   happen, pursuant to Qwest's documentation. We were

11   expecting a FOC. Did we get a FOC? Did it have a due

12   date that we were expecting?

13   MR. CONNOLLY: The test transaction that

14   KPMG provided you in this particular example, did that

15   have any expectations attached to it?

16   MR. MAY: Yes, the instances had

17   expectations.

18   MR. CONNOLLY: So, it's a combination of

19   evaluation -- did those expectations that are in the

20   transaction you received from KPMG Consulting, was that

21   also part of your evaluation criteria?

22   MR. MAY: Yes. Unspecified responses, in

23   that case, would also generate an observation or an

24   exception. It's possible that KPMG may have issued an

25   observation and exception, based on the results, as

1   matched against their expectations as well.

2   MR. WEEKS: When we designed a test case,

3   we communicated, at the time we defined that test case,

4   whether we expected it to flow-through normally into

5   work; or we would, at the design of the test case, say

6   this is something that we're trying to build in an

7   error or problem or an issue. And, so, you should find

8   a problem when you go to do this, or not. So, that's

9   the sense in which we communicated an expectation. It

10   was the expected outcome, given that, if it's a

11   properly formatted order, you get a properly formatted

12   FOC back.

13   MR. CONNOLLY: In the case that KPMG

14   handled HP transactions, we expected a reject out of

15   this. If it didn't reject, who wrote the observation

16   or exception?

17   MR. MAY: Generally speaking, it would be

18   HPC, unless, through our parallel process, we

19   determined that it may have been a test bed issue, or

20   some sort of an artifact of the test account

21   infrastructure. Then KPMG would pursue that with

22   Qwest.

23   MR. WEEKS: Tim, in general, I think the

24   method we used to operate was that we would give

25   direction to HPC as to how they should proceed if they

1   found problems with individual orders or individual

2   instances or individual responses, things that -- where

3   it appeared that the way the system operated, or the

4   way the order got processed, or the way the response

5   was formulated, didn't appear to agree with what they

6   understood from the business rules and documentation

7   issue, kind of at that instance level. They would work

8   that, and in the way that a normal CLEC would, through

9   the Help Desk, and alike.

10   If it was determined, as a result of sort

11 of working through the normal CLEC processes, that it

12 looked like they found an error in documentation, or it

13 looked like they found a place in the system where it

14 didn't appear to be working right, they would write an

15 0 or an E, based upon what they believed the problem

16 was. That would go through the O&E process that we're

17 all familiar with, which KPMG Consulting tended to look

18 at the Os and Es. We were tending to be looking across

19 groups or populations of orders as opposed to

20 individual orders.

21   MR. CONNELY: Right. I understood that

22 sort of layering, if you will, of evaluation. But, was

23 there any other set of inputs to HP that guided you on

24 preparing your expectations for preorder and order and

25 repair and maintenance?

1   MR. MAY: No.

2   MR. CONNOLLY: So, it was the Qwest

3   documentation and anything that came across for a

4   particular test case/instance?

5   MR. MAY: Correct. Correct. Hang on one

6   second. The only other one we can think of would be

7   where HP, as other CLECs are capable of doing, would

8   have a Subject Matter Expert type of meeting with Qwest

9   and would provide some sort of a guidance, sort of,

10   through an account management process.

11   MR. CONNOLLY: In terms of this earlier

12   test case, 12 -- or 12 -- Test Cross Reference 12-2-1,

13   for completeness, is that it would seem to me that --

14   correct me if I am wrong -- that the preponderance of

15   the definition of what's complete would come from

16   Qwest's Website documentation?

17   MR. MAY: Correct. I mean,

18   notwithstanding the fact that we're running a test, and

19   the test cases are issued to us by the test

20   administrator, and they are testing for certain

21   outcomes. I am not sure you can separate the two.

22   They both apply.

23   MR. CONNOLLY: Now, how about evaluation

24   criteria in any of the 12-1 through 12-7, that deals

25   with the accuracy of the responses that you received

1   from submitting preorder queries or orders?

2   MR. MAY: I am sorry. What's the

3   question?

4   MR. CONNOLLY: In any of the test

5   cross-references, 12-1 through 12-7, and their

6   subordinate numbers, which of those involved sort of

7   test evaluation criteria of accuracy in the responses

8   of the preorder queries, accuracy in the responses of

9   the preorder confirmations and rejects?

10   MS. ANDERSON: This is Denice Anderson of

11   MTG. Are you talking about 12. -- 12-1-2 in terms of

12   your talking about the criteria themselves, which ones

13   included accuracy?

14   MR. CONNOLLY: Yes.

15   MR. WEEKS: So, we're running through the

16   table and finding where we say "accuracy."

17   MS. ANDERSON: In the table, it says

18   accuracy, 12-2.2, 12-2.3 --

19   MR. MAY: The first one we identified is

20   12-2.2.

21   MR. CONNOLLY: All of those.

22   MR. MAY: Apparently, everyone that ends

23   in a -2.

24   MR. CONNOLLY: Those seemed to me, as I

25   look through them, to relate to error messages. I was

1   asking about the preorder queries that you received

2   responses for. Which of these did you consider the

3   accuracy of the response? 12-2.3?

4   MR. MAY: Okay. I think we're getting to

5   a, perhaps, revised table for those test

6   cross-references that end in a -1, 2, added the word

7   "accuracy" in addition to completeness, or in addition

8   to, "complete."

9   MR. CONNOLLY: Are you going to go back

10   and do an analysis on accuracy?

11   MR. PETRY: It was done there.

12   MR. MAY: It was done there. The report

13   is not clear that that's where we measured the accuracy

14   for the -1s in the table.

15   MR. CONNOLLY: How about the evaluation

16   criteria for the timeliness of a response relative to

17   the pseudoCLEC work, not relative to PIDs or other

18   sorts of measurements?

19   MR. CRAIN: What do you mean, timeliness

20   outside of PIDs?

21   MR. CONNOLLY: Well, in the preparation

22   of an order, where there's a step that says, pull a

23   CSR, do a TN query, do a facilities check. If you

24   didn't get the TN response, when you wanted it, did you

25   have to do something else?

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 1                    MR. MAY:  That's just out of scope for

 2      HP.  It was there, only if we never received a response

 3      whatsoever.  We weren't evaluating the time on this.

 4      That was another part of the overall test.

 5                    MR. WEEKS:  We didn't make, into the

 6      design of the test cases, an expectation of how long it

 7      should take to get a particular response.  We, as Geoff

 8      has indicated, that's analyzed across a universe of

 9      orders, what the average response time was, but we set

10      no expectations for Hewlett Packard, in the definition

11      of the test case, about how long they should expect to

12      wait before they received any particular response to

13      any particular query or any particular Os or Es or

14      anything else.

15                    MR. CONNOLLY:  So, in the case where you

16      submitted a preorder query, you didn't get a

17      response --

18                    MR. MAY:  We would issue an observation.

19      We would escalate through normal channels.

20                    MR. CONNOLLY:  If you issued an order and

21      you didn't get an FOC --

22                    MR. MAY:  Help Desk, and then,

23      ultimately --

24                    MR. CONNOLLY:  Help Desk and --

25                    MR. MAY:  Observation or exception.
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1   MR. CONNOLLY: Is it true that there is

2   documentation on the Qwest Website, by which you built

3   your expectations, that says you should get a response

4   for each one of these transactions? Is that just sort

5   of in the EDI world?

6   MR. MAY: You're talking about

7   functionally?

8   MR. CONNOLLY: Yes.

9   MR. MAY: Yes, yes.

10   MR. CONNOLLY: For both GUI and EDI.

11   MR. MAY: A question as to whether we

12   mechanically receive the response. We are not

13   measuring the response times. I think we covered that.

14   MR. CONNOLLY: I understand the response

15   time issue.

16   MR. MAY: As far as the response times,

17   the PIDs were the source of expectations,

18   notwithstanding the fact that HP did not -- it was

19   outside of our scope to measure the results for time

20   lengths. But the PIDs were the source of the

21   functional expectations.

22   MR. CONNOLLY: The performance

23   expectations?

24   MR. MAY: Yes.

25   MR. CONNOLLY: Not the functional

1   expectation?

2   MS. MAY: Correct. Sorry.

3   MR. CONNOLLY: That's okay. By all

4   means. One question more. On -- if you look at

5   paragraph 2, it says, "Method."

6   MR. PETRY: Where?

7   MR. CONNOLLY: In your report, 12A,

8   paragraph 2.0, method.

9   MR. PETRY: Okay. I am sorry. I thought

10 you meant this paragraph 2. 2.0.

11   MR. CONNOLLY: "This section summarizes

12 the test execution method." The business process

13 description seems to relate to what CLECs do sort of in

14 general, but not necessarily what HP did in its role as

15 the P-CLEC. Do you agree with that?

16   MR. MAY: We performed them as a CLEC.

17 We're describing the general CLEC process.

18   MR. CONNOLLY: And in the subordinate

19 sections of 2.1, that deal with the various processing

20 and query types and interface options, and so forth,

21 those are sort of general information about what a CLEC

22 would expect in terms of the operation performance of

23 these interfaces?

24   MR. MAY: Correct.

25   MR. CONNOLLY: But it's not a statement

1   that HP went through and did every one of these things

2   this way?

3   MS. ANDERSON: Tim, Tim, is your

4   question -- I am just trying to understand. This is

5   Denice Anderson. Is your question, do you want to know

6   whether, where it says, "CLECs," it should say

7   "pseudoCLEC"? Is that a suggestion or what is the -- I

8   am confused about the nature of the question.

9   MR. CONNOLLY: What I believe this to be

10   is an explanation of, you know, the interfaces, sort of

11   generally. It's not a statement by HP, this is the way

12   I understand every one of these things to function.

13   It's not an -- I don't think it's -- I don't understand

14   it to be a statement by HP of, this is the way I

15   executed this test.

16   MS. ANDERSON: So, Geoff and Don, is the

17   implication there that that's how you did it? This

18   just says "CLEC" instead of "pseudoCLEC"?

19   MR. MAY: Well, as a primary matter, our

20   interim report would describe what functionality this

21   CLEC established. And, in the first instance, the MTP

22   establishes what's within the scope of the test, from a

23   transaction test case and test instance perspective.

24   I think, Tim, you are asking, what have

25   we got here? Is it what we did, the steps that we

1   took, or is this a description of the business process?

2   And I would say this is a description of the business

3   process, not necessarily that the P-CLEC performed

4   every single one of those transactions.

5   MR. CONNOLLY: So, that's what I thought.

6   MR. MAY: Okay.

7   MS. ANDERSON: Can we move onto the next

8   question now? I am just mindful of the time, and

9   unless there's something of import here, could we move

10   along?

11   MR. MAY: Anything else, Tim?

12   MR. CONNOLLY: That's all. Thanks.

13   MR. MAY: We're moving on now to

14   WorldCom's 12A questions, beginning with WorldCom

15   Question 1: Why are work completion notifications and

16   bill completion notifications excluded from the

17   post-order phase?

18   This question was answered in AT&T No. 2,

19   HP's response to AT&T No. 2. And Question No. 2 --

20   MS. OLIVER: Excuse me. Becky Oliver

21   with WorldCom. Just to clarify on Question 1. Work

22   completion notifications are SOCs which were received.

23   Billing completion notifications were received for the

24   EDI interface, but not the GUI.

25   MR. MAY: Correct.

1   MS. OLIVER: Thanks.

2   MR. MAY: You are welcome. Then WorldCom

3   2 was answered in AT&T No. 4, HP's AT&T No. 4 on 12A.

4   Question 3: To what extent must an

5   address match Qwest's OSS to prevent a rejected order?

6   P-CLEC's understanding is that an exact address match

7   on a LSR is required.

8   MS. OLIVER: Becky Oliver, WorldCom. Is

9   that also the experience that the P-CLEC had?

10   MR. MAY: Yes.

11   MS. OLIVER: Thank you.

12   MR. MAY: WorldCom 4: For what type of

13 end customers are CSRs available to be queried by

14 CLECs? For example, Qwest retail customers, CLEC

15 resale customers, CLEC UNE-P customers, et cetera.

16 During the course of the test the P-CLEC conducted, the

17 CSR requests for Qwest retail, CLEC UNE-P, CLEC resale

18 and CLEC UNE accounts.

19   Question 5: Does Qwest's CFA validation

20 tool provide CFA availability information at the DSL

21 level? In response to a HP request for clarification,

22 WorldCom indicated that it was specifically interested

23 in, quote, if a DSL riding a higher capacity facility

24 can be validated. HP defers to KPMG.

25   MR. DELLA TORRE: Our understanding is

1   that the answer is, yes, but we would defer to Qwest

2   for confirmation.

3   MR. VIVEROS: Chris Viveros from Qwest.

4   We would agree that both -- in the original statement

5   of the question, that the CFA verification tool, from a

6   preorder standpoint, is available at the DS0 level.

7   The tool is designed, not for the purposes as described

8   in the WorldCom clarification, but you can certainly

9   use the tool to see that, in fact, a particular DS0

10   slide on the DS1 was occupied and in-service.

11   MR. MAY: Question 6: Are business

12   rule/BPL fatal errors system or manually generated? It

13   is the P-CLEC's understanding that Qwest systematically

14   generates BPL errors. Qwest systematically or manually

15   generates fatal errors.

16   Question 7 --

17   MS. OLIVER: Becky Oliver, WorldCom.

18   Clarification on the response to No. 6. You said that

19   business rule errors are systematically generated?

20   MR. MAY: BPL errors.

21   MS. OLIVER: Okay. Then you said fatal

22   errors are either manually or systematically generated.

23   And are any fatal errors considered business or BPL

24   errors?

25   MR. MAY: Yes. There are circumstances

 1   which we describe.

 2   MS. OLIVER: So, all of those fatal

 3   business/BPL errors would be systematically generated?

 4   MR. MAY: The answer to the question is,

 5   no. In other words, not necessarily, I guess.

 6   MS. OLIVER: So, just to clarify, then,

 7   the original answer is being modified to say -- the

 8   question reads, "Are business rule/BPL errors system or

 9   manually generated?" The answer is both. Is that what

10   I am understanding?

11   MR. PETRY: Can we -- Don Petry, HP. Can

12   we get some clarification? You're using BPL and fatal

13   error side by side. It is the P-CLEC's understanding

14   that there is a BPL, or Business Process Layer, that,

15   when an order comes in, it first goes through the BPL,

16   and there are upfront edits. If it fails one of those

17   edits, a BPL error is systematically generated back.

18   If it clears that front, and at the BPL layer, the

19   order can then go -- continue to flow into Qwest's

20   systems, but there may be Legacy or back-end systems

21   that can trigger a fatal reject coming back to you,

22   even though you made it through the front BPL layer.

23   There may still be some edits in a Legacy or back-end

24   system that can trigger a fatal error.

25   Additionally, a Qwest service

1   representative, while processing a service order, can

2   go ahead and generate a fatal or a nonfatal error on an

3   order. So, that is why the comment about

4   systematically fatal errors can be generated either

5   systematically or manually. Does that answer the

6   questions, Chris, or Beth? Would you care to comment

7   or confirm?

8   MR. VIVEROS: This is Chris Viveros for

9   Qwest, and we generally agree with Don's explanation.

10   There may be some nuances that are slightly different,

11   but that Don wouldn't be aware of, given the fact that

12   they did the black box test.

13   I think the important issue here is that

14   we talked about this in Santa Fe. We do have a

15   Business Process Layer that performs validation and can

16   detect errors. Depending on the severity of the error,

17   that could get fatally -- that could be rejected back

18   to the CLEC. A reject notice would be generated

19   mechanically. It might continue through processing and

20   have a human-evaluated, and the service representative

21   would make a determination, based on the type of error,

22   whether or not a nonfatal reject message should go

23   back, or whether there's more information that they can

24   get to reconcile the order and continue processing.

25   Where the service representative

1   determines that the error is severe enough to be

2   rejected, they would manually initiate that reject back

3   to the CLEC.

4   MR. WEEKS: Chris, in that case would

5   that be considered a BPL layer error?

6   MR. VIVEROS: We don't classify our

7   errors that way. It's an error, depending on the type

8   of error, severity, and our ability, with the resources

9   available to us, to reconcile it either as a nonfatal

10   or a fatal. If it's fatal, then it will generate a

11   reject back.

12   MR. DELLA TORRE: I think an important

13   distinction that's often lost is the difference between

14   errors and rejects. And an error is something wrong

15   with the order. A reject is a response type that goes

16   back to the CLEC.

17   MR. MAY: Question 7: Why can

18   system-generated errors be corrected with either a new

19   LSR or a supplement order, whereas a manually generated

20   errors must be corrected using a supp?

21   MS. OLIVER: I am sorry. I am sorry to

22   interrupt. I just don't want to lose the train, and I

23   had a thought there. I just had one more follow-up,

24   related to the question about, okay, it's past the BPL

25   edit layer. And, at this point, now, it's going

1   through -- the order is going through some additional

2   checks, either by another system or a rep. And at that

3   review period, could the -- one of the reasons that an

4   order would be rejected be due to business rules,

5   because that's what I am trying to get an understanding

6   of.

7   At what point, in Qwest's order

8   processing, would the CLEC be able to say, my order was

9   submitted and successfully met all of the required

10   business rules. It's passed the original BPL edit, but

11   it has to go to this additional step. Is that correct?

12   MR. VIVEROS: Chris Viveros for Qwest.

13   Yes, I believe that is correct. There are errors that

14   are detected, beyond the Business Process Layer

15   executing the validations, that would be, quote,

16   unquote, a business rule violation, that would result

17   in a reject back to the CLEC.

18   MR. WEEKS: Mike Weeks. Is it fair to

19   say, if I had received a FOC, that there are no errors

20   in the LSR?

21   MR. VIVEROS: I think it would be fair

22   for you to say that, yes.

23   MS. ANDERSON: Perhaps it's a -- if a SOC

24   was received.

25   MR. WEEKS: That was my first answer.

1   You can actually get a reject after FOC, is my point.

2   MR. DELLA TORRE: Typically not from an

3   LSR.

4   MR. VIVEROS: That's true. At one point

5   in time in the -- at one point in time, that situation

6   was experienced during the test. Since then, we have

7   worked through the Change Management Process, and we

8   have changed the circumstances where that would occur,

9   but I do think it's fair to say that, if you got a FOC,

10   under most normal circumstances, there's no errors on

11   that LSR. We're going to be able to successfully

12   provide the service that you request.

13   MR. MAY: Okay. Question No. 7. I

14   believe I have read the question I believe it's been

15   answered in AT&T question No. 14, which Chris Viveros

16   provided some clarification on.

17   WorldCom 8: Under what circumstances

18   would a nonfatal error be generated after a FOC? HP's

19   understanding is that Qwest could generate a nonfatal

20   error, if an error was detected after the service order

21   was created.

22   MR. VIVEROS: This is Chris Viveros from

23   Qwest. And I think it's accurate to say that that's

24   what HP experienced during a good portion of the test,

25   as I referenced a moment ago. That process of using

1 nonfatal errors post-FOC to communicate undetected

2 errors has been modified through the negotiations with

3 the CLECs in the Change Management Process. If we

4 detect errors after having generated a FOC, Qwest's

5 current business process is to issue a jeopardy.

6   MS. OLIVER: Thank you.

7   MR. MAY: Question No. 9: Verify that

8 HP, acting as the P-CLEC, discontinued tracking of the

9 LSR after a SOC was received, such that any WCN or BCN

10 notice that followed the SOC was not evaluated.

11 Verify. Correct.

12   MS. OLIVER: Thank you. Becky Oliver,

13 WorldCom. Was that, per scope of the MTP, that BCN

14 notices would not be validated in some way, other than

15 what we already talk about with the PID?

16   MR. MAY: Correct. Question 10: Does

17 the scope of the following evaluation criteria, "Qwest

18 provides complete responses to CLEC preorder

19 transactions," include the sufficiency of preorder

20 responses for translation to, and integration with,

21 ordering scenarios? The answer is, yes.

22   Question 11, and the response here is

23 going to apply for Questions 11 through 15, except for

24 there are different products which I will note. Did

25 HP's evaluation, which found that accurate and clear

1   error messages were returned on resale orders, include

2   instances where multiple error messages were returned

3   for one LSR, so that HP confirmed that the returned

4   error messages reflected all errors included on the

5   LSR. And the answer is, yes.

6   MS. OLIVER: Becky Oliver, WorldCom. And

7   when that happened, was that the result of

8   unintentional errors on the LSR? Did I understand,

9   from earlier discussion, that orders were not

10   intentionally submitted with multiple errors?

11   MR. MAY: Yes, except for perhaps some

12   test-bed-related issues. So, again, the answer is yes.

13   For Question 12, referring to UNE-P and UNE-C orders;

14   13, 14 and 15 for UNE-L, line-sharing and shared loop

15   orders and UDF orders.

16   That brings us to Montana State

17   Commission, Question No. 1. The third sentence in

18   Section 2.1.1.1, should this sentence be revised to

19   read, "If the customer address on LSR does not match."

20   Yes, HP will revise its report. Okay.

21   Moving right along to the questions on HP

22   report Test 12B, on Test 12B. First question: HPC

23   reports, "CLECs do not need to migrate to new releases

24   immediately." Please explain whether this statement is

25   true for all EDI interfaces employed by Qwest, i.e.,

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 1    preordering, ordering and billing.  The statement is

 2    true for all IMA EDI functions.  This statement was in

 3    reference to the IMA EDI interface for preorder, order

 4    and post-order functions only.

 5                Question 2 --

 6                MR. CONNOLLY:  Tim Connolly.  Do you

 7    know, for billed, if there's a requirement to migrate

 8    to new releases immediately?

 9                MR. MAY:  With regard to CRIS -- it's our

10    understanding, with regard to CRIS 811, that, yes, you

11    have to migrate.

12                MR. CONNOLLY:  Thank you.

13                MR. MAY:  Question 2:  Please provide the

14    basis for HP's statements on the standalone test

15    information.  The statements are based on Qwest's IMA

16    EDI implementation guidelines.

17                Question 3:  Please provide HP's

18    understanding of the differences between Qwest bills

19    and invoices, if any.  There is no difference.

20                Question 4:  Please provide the number of

21    wholesale bills received by the P-CLEC from Qwest

22    during the course of the OSS third-party test.  In the

23    case there is a difference between bill and invoice,

24    provide the number of wholesale invoices received by

25    the P-CLEC from Qwest during the course of the OSS
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1   third-party test. The number of wholesale bills

2   received by the P-CLEC was 44,430.

3   Question 5: Please provide the number of

4   wholesale bills received by the Volume P-CLEC from

5   Qwest during the course of the OSS third-party test.

6   We received none. No CRIS 811 bills.

7   Question 6: Provide the number of bands

8   that Qwest assigned to the P-CLEC during the course of

9   the OSS test. Indicate the number assigned per state.

10 During Test 12, Qwest assigned 78 bands to the P-CLEC.

11 All states have five, except Idaho, which had eleven;

12 Oregon, six, and Washington, six.

13   Question 7: Please -- I am sorry.

14 Provide the number of bands that Qwest assigned to the

15 Volume P-CLEC during the course of the OSS test.

16 Indicate the number assigned per state. During the

17 volume test, Qwest assigned 72 bands to the Volume

18 P-CLEC. All states have five, except Oregon, which had

19 six, and Washington which has six.

20   Question 8: Please explain the reasons

21 HP provides for no description of the DUF interface.

22 Daily Usage Fee, DUF, was covered in Section 8.2 of

23 HP's interim report.

24   Question 9: Please --

25   MR. FINNEGAN: John Finnegan with a

1   follow-up on the interim report. Should that be

2   considered an adjunct or a part of HP's final report?

3   MR. MAY: It's a -- I would say, no. Our

4   interim report is our interim report. It was issued

5   March 31st, 2001. And our final report is our final

6   report.

7   MR. FINNEGAN: But it appears that some

8   of the responses, in order to get a sense for

9   activities that HP performed, would not be found in the

10   draft final report. It would be entirely separate

11   sections in the interim report.

12   MR. MAY: Based on chronology and the

13   requirement for us to issue an interim report.

14   MR. FINNEGAN: Is there any way to map

15   which portions of the interim report would be only

16   found in the interim report and not found in the draft

17   final report?

18   MR. MAY: Again, it's a chronological

19   issue, and I believe we noted the time frames or the

20   chronology in our draft final report. In other words,

21   the interim report covered through March 31st of 2001.

22   The final report covers everything else.

23   MS. ANDERSON: This is Denice Anderson

24   from MTG. I think, also, would it be fair, Geoff, to

25   say that the interim report focussed on the initial

1   creation of the interfaces, and then other things

2   utilizing those interfaces, or upgrading them to the

3   next release, or whatever, would be covered in the

4   final report?

5   MR. MAY: HP would concur with that. In

6   Section 2.4 of our Test 12A report, it states that,

7   "during the period from March 2001 to April 2002."

8   We're just checking for that reference to chronology.

9   MR. FINNEGAN: If so, if I am

10   understanding you, you really need to look at both. If

11   you want to understand what HP's findings were, prior

12   to March 31st of 2001, you need to look at the interim

13   report.

14   MR. MAY: Yes. And, in general, as

15   Denice explained, the interim report covers the

16   building of the pseudoCLEC, whereas our draft final

17   report describes the experience during transaction

18   testing.

19   Question 9: Please explain whether HP

20   considers recertification to be a part of the migration

21   activities that it conducted in the Release 7 and

22   Release 8 activities. The answer is, yes.

23   Question 10: Provide a definition and

24   description of the scouting activities conducted by the

25   P-CLEC. I believe this question was covered yesterday

1   by KPMG. Anything else, Joe?

2   MR. DELLA TORRE: No. I will just revisit

3   it, as promised yesterday. This was one of those very

4   smoothly presented question and answers, from the HP

5   section, on scouting activities. This is a testing

6   principle that we have applied in many of our test

7   areas, where we will conduct, if you will, a QA test,

8   where we send a small number of representative

9   transactions to determine that, in fact, our

10   transactions are well-formed; that connectivity exists;

11   that we can receive and understand responses. Those

12   are the, quote, scouting activities.

13   MR. MAY: Okay. I believe that brings us

14   to WorldCom questions for test -- for HP Report 12B.

15   MR. CONNOLLY: Don't you wish.

16   MS. ANDERSON: Yes, we do.

17   MR. CONNOLLY: Earlier this morning, in a

18   discussion of AT&T's questions on Test 12, specifically

19   No. 2, we asked which of the preorder inquiries can be

20   integrated into ordering transactions by HP. And you

21   referred us to your reports. And I look at Footnote 3,

22   in Report 12A, and it says, "The results of HP's

23   analysis on integration capability issues are

24   documented in Appendices HP B and HP C respectively."

25   Are these the appendices you are talking about?

1   MR. MAY: Yes, sir.

2   MR. CONNOLLY: Can you tell me where, in

3   Report B, you see anything about integration?

4   MR. MAY: You mean Appendices B? Is

5   that --

6   MR. CONNOLLY: You said, when I asked

7   you, you said that's this report that we were just

8   talking about.

9   MR. WEEKS: I think the confusion is over

10   12B versus Appendix B.

11   MR. MAY: Yeah. Those are two

12   separate --

13   MR. WEEKS: Two separate documents. Both

14   have a "B" in it.

15   MR. CONNOLLY: So, Report 12B does not

16   describe interface.

17   MR. MAY: That preorder to ordering

18   integration was covered in the Appendices B and A -- I

19   mean B and C, sorry.

20   MR. CONNOLLY: Okay. Thanks for that.

21   It seems to me that Section 2 of Report 12B is sort of

22   generalized background information. And we don't get

23   to find out what HP really did, until we get to Section

24   3. Am I reading this properly?

25   MR. MAY: Yes.

1   MR. CONNOLLY: Why are there no

2   evaluation criteria against which you looked at the

3   proceeds of the work of the pseudoCLEC, and in 12B?

4   MR. MAY: This is because, by agreement

5   between the parties, the vendors, and with the

6   concurrence of the steering committee, those activities

7   that the pseudoCLEC engaged in, other than those

8   covered in our assigned, discrete reports, the

9   preference was to have them integrated, if you will,

10   into the KPMG draft final report. And, so, Test Report

11   12B and 12C are intended to provide that description of

12   the so-called pseudoCLEC experience.

13   MR. CONNOLLY: Not subjected to any

14   evaluation? Just iteration of fact.

15   MR. MAY: Correct.

16   MR. CONNOLLY: That's different from 12A?

17   MR. MAY: Correct.

18   MR. CONNOLLY: Which is a report that

19   conveys a certain level of your evaluation of how those

20   interfaces work.

21   MR. MAY: That's correct. And anything

22   else?

23   WorldCom Question 1 on Test Report 12B:

24   Clarify what is involved for a CLEC to, "Verify the

25   transport configuration parameters," and why that is

 1   necessary for transactions that do not require

 2   recertification. Qwest's trading partner I.D. has

 3   changed with each IMA EDI release. Trading partner

 4   checks need to be conducted when completing a new IMA

 5   EDI release, even if the transaction does not require

 6   recertification.

 7   Question 2. Does Qwest's 811 Transaction

 8   set contain any variances from TCIF 811 guidelines? If

 9   so, are those variances identified in the, quote,

10   BillMate Billing EDI Customer Guide, unquote, for

11   CLECs' use. The answer is, yes. Yes, in both

12   instances.

13   WorldCom Question 3: Does the RCE User

14   Guide define which product services qualify as

15   nondesigned and for which RCE would be used? The

16   answer is, no.

17   WorldCom 4: For each new CEMR/RCE

18   release, when are the release notes provided to CLECs?

19   (i.e., before, upon, or following implementation of the

20   release.) The answer is before.

21   Question 5 --

22   MS. OLIVER: Hold on just a second.

23   Becky Oliver, WorldCom. Follow-up back on Question 3.

24   Did the P-CLEC then just find out from -- through their

25   account management, or from what means, as far as how

1   RCEs should be used for nondesigned services, if it

2   wasn't something that was documented in the user guide.

3   MR. MAY: The RCE User Guide does not

4   specifically define which products and services qualify

5   as nondesigned. Qwest has combined the RCE User Guide

6   into the CEMR User Guide, so the answer to your

7   question is the CEMR User Guide as opposed to some

8   other source.

9   Question 5: What source or sources does

10   a CLEC use to obtain one of the four formats of the

11   circuit I.D. needed to submit a designed-service

12   trouble ticket via CEMR? There are two sources. One,

13   CLECs use the format that is provided on the FOC; or,

14   two, CLECs use the format for the type of circuit that

15   Qwest provided to the CLEC.

16   MS. OLIVER: Becky Oliver, WorldCom. I

17   didn't follow the No. 2. CLECs use the format

18   provided --

19   MR. MAY: CLECs use the format for the

20   type of circuit that Qwest provided to the CLEC.

21   MS. OLIVER: Well, where did -- how did

22   Qwest provide that circuit format?

23   MR. MAY: Through the circuit ordering

24   process.

25   MS. OLIVER: So, is that really the same

1   as the first response that's provided back on the FOC,

2   and then it's up to the CLEC to keep track of that for

3   any future time that they want to submit a trouble

4   ticket?

5   MR. MAY: We're going to take that back

6   and try to provide a clarification for you.

7   MR. PETRY: Can you restate the question

8   that you are looking for?

9   MS. OLIVER: Sure. This is asking, from

10   what source or sources did the CLEC use to obtain one

11   of the -- or the correct format to use for the circuit

12   I.D. which is needed to be used to submit a

13   designed-service trouble ticket via CEMR.

14   MR. MAY: Okay.

15   MR. VIVEROS: This is Chris Viveros from

16   Qwest. I think part of the problem, that the question

17   in itself, to some degree, infers that there's a

18   choice. And I think HP's answer is trying to convey

19   that there really isn't a choice. Circuit I.D.s are

20   assigned based on type of circuits. So, if I have a

21   point-to-point circuit, like an unbundled loop, it's

22   going to get a common language circuit identifier

23   format, a private-line type of format as opposed to a

24   multiplex high-capacity facility, which gets a common

25   language facility identification format. The formats

1   are different. So, based on what you see, by product,

2   you will always see a single format for that type of

3   product.

4   To your earlier question, yes, once you

5   have asked for an unbundled loop, we will assign a

6   circuit I.D. and that circuit I.D. for that unbundled

7   loop should be treated just like a telephone number for

8   finished service. You would maintain it, once you

9   receive it on FOCs, or subsequent order activity, for

10   maintenance and repair purposes, for bill validation

11   purposes.

12   MR. MAY: Does that clarify it for you?

13   MS. OLIVER: Yes, thank you.

14   MR. MAY: Good. Questions 6 and 7, we

15   believe KPMG has covered yesterday.

16   MR. DELLA TORRE: Would anyone like a

17   recap of those?

18   MS. OLIVER: Yes.

19   MR. DELLA TORRE: The answer is, yes.

20   Great. Question 6 from WorldCom: One of the Qwest

21   representatives verifies CLEC ownership of a line for a

22   manually submitted trouble ticket. Is Qwest able to

23   identify instances where the line recently migrated to

24   the CLEC, i.e., the SOC has issued but the order has

25   not completely processed through Qwest's back-end

1   systems. And this is a question of ownership rules,

2   and Qwest employees do have the ability to contact

3   business offices, and other groups, to verify the

4   ownership in question. And we discussed yesterday how

5   a ticket could be put in, even if the RSID is not --

6   the migration has not happened yet. However, this

7   would need to be assessed, really, on a case by case,

8   and the specifics of the timing of the migration, the

9   timing of the trouble ticket, and what type of

10   migration was happening, the type of trouble being

11   entered.

12   So, generically, the answer is that there

13   are rules of ownership that Qwest employees can employ.

14   But, specifically, we do not know, in any particular

15   case.

16   And Question 7: When a Qwest

17   representative assigns a trouble ticket number, and an

18   appointment time for the completion of repairs for

19   manually submitted trouble tickets, does the

20   appointment time reflect the same commitment time that

21   would have been returned if the trouble ticket had been

22   electronically submitted? And the answer is, we do not

23   know. We did not do a validation or a comparison from

24   one submission format or interface to the other.

25   MR. MAY: Question 8: Confirm if the

1   P-CLEC evaluation of received CRIS 811 invoices was

2   limited to identification of any EDI mapping/format

3   issues and did not involve an analysis of the content

4   or accuracy of the CRIS 811 invoice. This is correct.

5   Question 9: Disregarding scope

6   differences between IMA Releases 6, 7 and 8.0, was the

7   P-CLEC's experience with workload and challenges

8   involved to migrate to a new IMA release consistent

9   with each IMA release? The answer is, yes.

10   Question 10: Did the P-CLEC conduct its

11   migration activities for IMA releases 7.0 and 8.0 at

12   the same time that the releases became available in

13   production? The answer is, yes.

14   Question 11: Based on the P-CLEC's

15   experiences with establishing access/connectivity to

16   CEMR, approximately how much time is needed by an

17   individual CLEC user to complete CEMR's browser and

18   digital certificate requirements? Digital certificate

19   assignment from the account manager takes a minimum of

20   48 hours. Downloading Netscape 4.51 takes 15 to 20

21   minutes per user. Loading the digital certificate

22   takes 15 to 30 minutes per user.

23   MS. OLIVER: Becky Oliver, WorldCom. A

24   couple of follow-ups, back on Question 10. The

25   response, yes. Is that apply to both IMA, EDI and GUI

1   releases?

2   MR. MAY: Yes.

3   MS. OLIVER: And I would like to

4   follow-up on Question 9, because I have some -- which

5   is kind of the general question, the nature of it.

6   Because I am saying, disregarding scope differences

7   between the IMA releases, did -- the P-CLEC didn't

8   necessarily find that any improvements or changes or

9   lessons learned were helpful in making implementation

10   of releases after, you know, they had one or two done;

11   that none of those types of things contributed to

12   making it an easier process. It was pretty much

13   consistent, the same challenges.

14   MR. MAY: Yes. We stand by our answer

15   that it was consistent. It's, I guess, sort of a

16   difficult question to answer, given that the

17   pseudoCLEC, or any CLEC, would be gaining experience in

18   going through the certification process with each

19   certification it undertook.

20   MS. OLIVER: Okay.

21   MR. MAY: We have.

22   MR. CONNOLLY: And Don's proud of that.

23   MR. MAY: We have done four.

24   MS. OLIVER: Thank you.

25   MR. MAY: Which brings us to just a

 1   follow-up on Tim's question on 12B, Question 8,

 2   regarding coverage of the interfaces in the interim

 3   versus HP final report sections. We do have a

 4   reference in Test Report 12B, in Section 1.0,

 5   description, the second paragraph.

 6   MR. CONNOLLY: Well, our Question 8, as I

 7   recall my records, is, explain the reasons that there's

 8   no description of the DUF interface. That's my 8.

 9   MR. MAY: Right. We said it was covered

10   in Section 8.2 of HP's interim report, which then led

11   to the discussion of what was covered where. So we're

12   just trying to provide a reference point to the point

13   that we made during that discussion.

14   MR. CONNOLLY: So, paragraph 1 does not

15   provide a description of the DUF interface?

16   MS. ANDERSON: (Shaking head in the

17   negative.)

18   MR. MAY: I apologize. The reference is

19   not so much Question 8, but the ensuing discussion.

20   MR. CONNOLLY: About the interim report

21   and its relationship to the --

22   MR. MAY: Correct.

23   MR. CONNOLLY: -- draft final report.

24   MR. MAY: Correct.

25   MR. CONNOLLY: I am glad you asked me to

1   follow-up. One short question for follow-up. I

2   remember I asked you this morning, about HP's

3   experience in integrating pre-order functions with

4   order. What did HP do to integrate, and you referred

5   me to Appendices B and C.

6   And Appendix C, which I couldn't open at

7   the time we were talking about that, says that the

8   purpose of the evaluation that's portrayed in Appendix

9   C is to analyze Qwest's OSS guidelines and its

10   adherence to industry standard LSOC 5 issue guidelines,

11   further analyzing Qwest's conforming to pre-order,

12   order and post-order processing. All discrepancies in

13   their perceived impacts and CLEC's ability to integrate

14   are documented.

15   There's nothing in here that says what

16   did HP integrate, which pre-ordering functions did HP

17   integrate with order. That was my original question.

18   MR. PETRY: Appendix B, Section 5, page

19   38.

20   MR. MAY: Appendix B, Section 5, page 38,

21   provides the Table 5.1. Identifies that those fields

22   that were integrated in pre-order to pre-order

23   processing. We did both preorder to preorder and

24   preorder to order.

25   MR. CONNOLLY: So, it's in Appendix B and

1   not C.

2   MR. MAY: Well, B describes the ability

3   of the pseudoCLEC to integrate pre-order and order for

4   Release 7. And in Appendix C, describes the same for

5   Release 8.

6   MS. ANDERSON: Okay. Can we move on now?

7   MR. MAY: Test 12C, AT&T Question 1 --

8   MR. VIVEROS: I am sorry to interrupt.

9   Before we leave B, Qwest would just like to make a

10   point about WorldCom 12B/7, which has to do with the

11   time commitments. We wanted to point out, this topic

12   was discussed yesterday. And Mr. Simons had indicated

13   that criteria for determining the commitment time is by

14   product. That is the only criteria. So, the method of

15   submitting a trouble ticket does not impact the

16   commitment time.

17   MR. WEEKS: Same tables that are used in

18   both cases; that are by product?

19   MR. VIVEROS: Exactly.

20   MR. MAY: AT&T Question No. 1 on Test

21   Report 12C: Please explain the discrepancies between

22   the HPC description of the composition of a Qwest

23   Service Team and that provided by KPMG in its Test 24.3

24   report. HP inadvertently titled the service director

25   as senior director, in one instance. HP revised the

1   report to correct this. HP also described two higher

2   level escalation points, as communicated to the

3   pseudoCLEC, by Qwest, which are executive director and

4   vice president.

5   Question 2: Please indicate the location

6   of the documented "P-CLEC expectations." Copy of

7   P-CLEC expectations will be provided with the final

8   version of HP's report.

9   Question 3: Please confirm that the

10   P-CLEC was not assigned a Sales Executive. This is

11   confirmed.

12   MR. FINNEGAN: John Finnegan. Can I ask

13   a follow-up. In the account management arena, there

14   was reason and approval from the TAG to cite certain of

15   the folks that were involved with the account

16   management relationship. Do these findings at all

17   distinguish between pre- and post-citing of the folks

18   that were subject to the evaluation?

19   MR. MAY: No. They were -- the Qwest

20   account team was cited from the beginning.

21   MR. FINNEGAN: So, these findings would

22   include conclusions, after the fact, for the accounts

23   that were being evaluated. They knew HP was the OSS

24   tester.

25   MR. MAY: That's correct.

1   MR. FINNEGAN: Did HP attempt to discount

2   that at all, or factor it into any of its conclusions?

3   MR. MAY: Andy?

4   MR. CRAIN: I guess I would want to

5   clarify that the whole issue of how the account teams

6   ought to be treated was addressed at the start of this

7   test. And to prevent favorable treatment, we agreed

8   that, rather than making those people blind to who the

9   pseudoCLEC was, we would cite them, but the process

10   would be open, so that CLECs could attend and watch and

11   make sure they weren't getting favorable treatment.

12   And I would state that there's no reason

13   to discount the fact that these -- discount these

14   conclusions, because people were cited, because other

15   processes were in place to ensure that they were not --

16   that the pseudoCLEC, indeed, would not be receiving

17   favorable treatment.

18   MR. MAY: I do think it's an interesting

19   question. You might -- another way of looking at it is

20   if they can't give answers or can't point us in the

21   right direction, even while they're cited, that might

22   be an indication of a problem area. And we did

23   identify such through the observation-and-exception

24   process, as we would any problem we encountered. So, I

25   would agree with Andy's characterization.

1   The account management meetings were open

2   to the TAG. They were noticed to the TAG. The minutes

3   were distributed to the TAG.

4   MR. FINNEGAN: Did HP notice any

5   difference, pre-and post-citing, in the treatment that

6   it was receiving from the cited employees?

7   MR. MAY: No. They were cited right from

8   the start.

9   MR. FINNEGAN: Were they cited right from

10   the start? My recollection is they were blind until it

11   appeared they had figured it out.

12   MR. MAY: They were cited from the

13   beginning.

14   MR. CRAIN: I think you are mixing up

15   Arizona and the ROC.

16   MS. ANDERSON: How could that be?

17   MR. CRAIN: We discussed this issue first

18   in Arizona, where it became apparent that people

19   figured out, very quickly, who the pseudoCLEC was. And

20   so, as a result of those learning experiences, I think

21   citing was in place from the start here.

22   MR. MAY: Moving on to WorldCom questions

23   on Test Report 12C.

24   Question No. 1: Please clarify what

25   service is being referenced in the following statement:

1   "The Account Team also ensures that the quality of

2   service provided to its CLEC customers is maintained."

3   (e.g., the account team service? Or Qwest's overall

4   wholesale service.) The statement in this question

5   refers to Qwest's wholesale service as the Qwest

6   service team is a single source of support for all

7   issues regarding ordering, provisioning, maintenance

8   and repair, as well as being responsible for

9   provisioning and maintaining the CLECs' service for

10   maximum performance.

11   Question 2: What actions did P-CLEC

12   observe its Account Team taking to ensure the "quality

13   of service" being provided to the P-CLEC? The P-CLEC

14   observed that the Qwest account team participating on

15   weekly conference calls to address questions and

16   issues, escalating issues internally, responding to

17   phone calls, pages, and E-mail communications in order

18   to ensure that service quality was delivered to the

19   P-CLEC.

20   WorldCom Question 3: Did HP, acting as

21   the P-CLEC, interact with its Account Team for items

22   outside the scope of what an actual CLEC would, given

23   the nature of the P-CLEC's testing requirements? The

24   answer is, no.

25   Question 4: Please identify the

1   differences between Service Manager and Account

2   Manager, to clarify footnote 5, which states, "In the

3   P-CLEC's experience, the same Qwest individual filled

4   both the Account Manager and Service Manager titles."

5   HP's report explains the differences understood by HP,

6   based on Qwest's documentation and the P-CLEC

7   experience. The P-CLEC has one service team that

8   answered for all products and services; and, therefore,

9   HP would defer to Qwest for further clarification.

10   MS. OLIVER: Becky Oliver, WorldCom. I

11   thought there's service management and sales

12   management. So, here it's saying service manager and

13   account manager. Are those one and the same?

14   MR. MAY: The titles were used

15   interchangeably, and they evolved over time.

16   MS. OLIVER: So, the footnote that is

17   saying, "The same Qwest individuals filled both the

18   Account Manager and Service Manager titles," that was

19   actually the same position?

20   MR. MAY: Yes. The title began with

21   account manager and evolved to service manager.

22   Question 5: Why did the P-CLEC's Service

23   Manager and Service Management Team also act as the

24   P-CLEC's sales team? And this is due to the parameters

25   of the test. There was no need for sales support.

1   Service support was necessary.

2   Question 6: How many individuals made up

3   the P-CLEC's Service Account Team? The answer is

4   three. And that concludes HP's Test 12 report.

5   MR. DELLA TORRE: I would like to go back

6   to something from earlier in Test 12. They were, I

7   believe, AT&T Questions 33 and 35, where there was a

8   request to disaggregate the results for PO-4A and PO-4B

9   into PO-4A-1 and 2, PO-4B-1 and 2. So we can run

10   through some numbers for you real quick, if folks want

11   to scribble these down. I would break them into

12   regions.

13   The first one is for Question 33. PO-4A,

14   eastern region, 4A-1, total of 16; 4A-2, total of 34.

15   For the central region, 4A-1, a total of 13; 4A-2,

16   total of 14. And for the western region, 4A-1, total

17   of 9; and 4A-2, a total of 26. And as we were

18   directed, one of the appendices -- I believe, K --

19   those were aggregated intentionally. So we are not

20   disaggregating those in the report, as we were not

21   supposed to begin with this information, one, being

22   provided to respond to a question.

23   And for Question 35, which is PO-4B.

24   Again, for the eastern region, 4B-1, 186. And 4B-2,

25   933. For the central region, 4B-1, 189; and 4B-2,

1   1,129. And for the western region, 4B-1, 172; and

2   4B-2, 810.

3   MS. ANDERSON: Joe, do you think --

4   MR. FINNEGAN: This is John Finnegan. I

5   am frantically scrambling through papers. Does that

6   provide sufficient information to back-in the specific

7   manually rejected percent of orders and automatically

8   rejected percent of orders? Is the denominator

9   somewhere in the --

10   MR. DELLA TORRE: Well, the numbers I just

11   gave you were the split of the total. So, the 34 and

12   the 16 would be the 50 that we provided.

13   MR. FINNEGAN: That would be the

14   numerator. It looks like it is on 12.5.5. 197 LSRs

15   submitted. Thank you.

16   MR. DELLA TORRE: Thank you. Okay. Good.

17   MS. ANDERSON: Yes, Joe.

18   MR. DELLA TORRE: Denice, I was just going

19   to say, I think Test 13 would be pretty -- I'm almost

20   afraid to say this, guys -- in comparison to what we

21   have done already this morning, this will be more

22   brief.

23   MS. ANDERSON: Yes. So, why don't we go

24   ahead and launch into that. The break is scheduled for

25   three. We might be able to get through some of this.

1   MR. DELLA TORRE: Start with Test 13,

2   Washington State.

3   MR. WEEKS: Yes. 13 is the order

4   flow-through evaluation. This test is a little bit

5   different than many of the other tests in the sense

6   that this was on a single evaluation criteria that was

7   in some form of satisfied, not satisfied, or whatever.

8   And there were actually ten of the evaluation

9   criterion, which were in diagnostics, so, it feels and

10   looks a little bit different in terms of results. So,

11   there are no not-sats in this. And you can browse

12   through the diagnostics and make of those what you

13   will.

14   There were, even though they were

15   diagnostic in nature, certain observations and

16   exceptions that were culled out in the various comment

17   sections for those -- where we saw things during the

18   course of the test that caused us to raise a question

19   or raise an issue with Qwest about flow-through itself,

20   but those are all now closed. And there are no

21   outstanding observations or exceptions, and there

22   really isn't a flavor of any state-specific kinds of

23   information that are embedded in these results with

24   respect to the flow-through. Any follow-up questions

25   from Washington?

1   Okay. Let's jump right in. AT&T

2   Question No. 1: By what means did KPMG Consulting

3   determine that orders did and did not fallout from

4   manual handling? And our process in this test was to

5   compare our expected flow-through performance with the

6   actual flow-through results, which we understood or we

7   gained that knowledge from a Qwest report of detailed

8   flow-through activities for ordering. And that is a

9   test-specific report. It's not something typically

10   generated by Qwest.

11   Question 2: Please provide such a figure

12   for the retail analogue of this system flow for retail

13   mechanized orders from submission through service order

14   generation. There was no parity components to the

15   process in the flow-through orders for Test 13;

16   therefore, we do not have that figure to provide.

17   MR. CONNOLLY: Tim Connolly. The request

18   was not for a number. The request was for a comparable

19   diagram attune to -- akin to Figure 13.

20   MR. DELLA TORRE: We don't have that.

21   MR. WEEKS: We didn't have any reason to

22   have it.

23   MR. DELLA TORRE: Question 3: Please

24   provide the ULR of the Qwest Website that contains the

25   Qwest Order Business Rules. And the Website is

1   Qwest.com/disclosures/netdisclosure409.html.

2   MR. CONNOLLY: Tim Connolly. Joe, is

3   this a precise document title, do you believe?

4   MR. WEEKS: This is the URL to get you to

5   the Web page.

6   MR. CONNOLLY: Is the document titled,

7   "Qwest Order Business Rules"?

8   MR. DELLA TORRE: We can actually direct

9   you to it. The rules are located under the following

10   links: That would be, the first is, quote, developer

11   worksheet/order -- or hyphen order. And, quote,

12   developer worksheet hyphen other order.

13   MR. CONNOLLY: Thank you.

14   MR. DELLA TORRE: Question 4: Please

15   confirm that there is no Qwest USOC, "NFT," that can be

16   included on an LSR that would prohibit the order from

17   being processed as FT or flow-through. And we wanted

18   to make sure that we clarified that our use of the

19   "NFT" was an acronym for nonflow-through.

20   The next several questions, I think, are

21   around the same idea. NFT, to the best of our

22   understanding, is not a USOC. It is not a FID. And

23   nor is it a data element. It is simply an acronym that

24   we use to identify nonflow-through.

25   MR. FINNEGAN: I want to go back to the

     1   third question. If I was hearing Qwest correctly --

     2   it's been a long couple of days. Did you say it was

     3   the EDI developer's worksheet in the business rules for

     4   flow-through eligibility?

     5   MR. DELLA TORRE: Qwest Order Business

     6   Rules are on the Qwest Website disclosure address. And

     7   the actual rules are located under links entitled,

     8   "developer worksheet-order" and "developer

     9   worksheet-other order."

    10   MR. FINNEGAN: Would that also include

    11   the GUI, since there's no development, as we have

    12   previously discussed, with GUI use?

    13   MR. DELLA TORRE: It's the same.

    14   MR. FINNEGAN: At one time, there was a

    15   document attached to the PIDs that put in place the

    16   rules for the orders for -- types of orders that would

    17   be flow-through eligible. Upon agreement of the TAG,

    18   that was taken out. My understanding was it was going

    19   to go somewhere in the Standard Interval Guide, is the

    20   document that --

    21   MR. WEEKS: This is what we used.

    22   MR. FINNEGAN: That you used. Is that

    23   the only document?

    24   MR. VIVEROS: This is Chris Viveros from

    25   Qwest. I think we're talking about different

1   documents. As I understand KMPG's answer, they are

2   talking about documentation that expressed Qwest's

3   Order Business Rules, not unique to flow-through, but

4   the actual Order Business Rules. The document that

5   John is referring to, the LSRs eligible for

6   flow-through, is a document that, at one point, was

7   appended to our PID by agreement. We removed that,

8   added a note to the PO-2 measure that says, "Subsequent

9   versions of this document will be managed through CMP."

10   That is how we publish the flow-through -- the LSRs

11   eligible for flow-through. It's sent out through the

12   CMP process, generally associated with a new version of

13   IMA, because that's when we would have updated the

14   rules.

15   MR. FINNEGAN: In the draft final report,

16   there's a reference, as the orders pass-through the

17   Operation Support Systems, OSS, as described above, the

18   eligibility is determined using rules described in the

19   Qwest Order Business Rules and if the LSR's eligible

20   for flow-through documents.

21   MR. DELLA TORRE: We do cite that, if you

22   look at Criteria No. 1311, you will see those -- the

23   exact documents that you just referenced as the

24   document sources that we used to set our expectations.

25   MR. FINNEGAN: So, when the documents

1   were corrected, and in response to exceptions and

2   observations, were both of these documents corrected

3   such that they were consistent?

4   MR. DELLA TORRE: Not necessarily, because

5   they provide different information and they're

6   different documents. One is telling you what LSRs are

7   flow-through eligible. Another is providing you with

8   business rules information.

9   MR. WEEKS: I think we may have misled

10   you with our answer. When we had flow-through-related

11   observations and exceptions, and Qwest decided to

12   update its document to describe what flow-through it

13   didn't flow through, then it wouldn't necessarily have

14   to update the business rules document. It might only

15   have needed to update the other one, the eligible

16   flow-through documents.

17   So, we were taking those together. We

18   should have answered it separately.

19   MR. FINNEGAN: Was it a mixed bag as to

20   what got updated, or was it, they always updated the

21   LSRs eligible for flow-through document, and sometimes

22   updated the Qwest Order Business Rules?

23   MR. DELLA TORRE: We experienced one

24   instance where the Order Business Rules were revised,

25   for -- related to an exception. In all other cases,

1   document revisions were made to the LSR flow-through

2   eligible document. And I believe we do cover that in a

3   question further on in either your set or WorldCom's

4   set.

5   MR. FINNEGAN: Maybe I am jumping ahead.

6   As long as we're on this train of thought, the

7   expectations as to what should flow through, is that

8   based on the LSRs eligible for flow-through

9   documentation?

10   MR. DELLA TORRE: Yes.

11   MR. FINNEGAN: Not the Qwest Order

12   Business Rules?

13   MR. WEEKS: Correct.

14   MR. FINNEGAN: Thank you.

15   MR. DELLA TORRE: Question 4 --

16   MR. CONNOLLY: Excuse me, Joe. Just to

17   point out an area where -- I believe it was a report

18   that confused me. In the last paragraph of Section

19   2.1, the second to the last sentence concludes with,"

20   "but the inclusion of an NFT Universal Service Ordering

21   Code (USOC) on the LSR, would prohibit the order from

22   being processed as FT."

23   MR. DELLA TORRE: We will revise that to

24   be clearer. What is intended there is that there are a

25   set of USOCs that are nonflow through. So, if one of

1   those USOCs is put on the order, then, even if the

2   parent order is typically flow-through eligible, if a

3   nonflow-through USOC is populated on that order, it

4   will drop manually.

5   MR. WEEKS: The USOC of time is not

6   flow-through.

7   MR. DELLA TORRE: As opposed to valid.

8   MR. CONNOLLY: That's what I thought.

9   MR. WEEKS: We will clarify the English.

10   MR. CONNOLLY: You can see the cause for

11   my concern. Is it your understanding that all of those

12   USOCs, that, if present, cause an order to not flow

13   through, are those documented on the LSRs eligible for

14   flow-through documents?

15   MR. DELLA TORRE: Yes, they are.

16   MR. CONNOLLY: Thank you.

17   MR. DELLA TORRE: So, Question 7: Are the

18   3.650 orders -- which we took to mean 3,650 orders.

19   MR. CONNOLLY: That's just one key away.

20   MR. DELLA TORRE: -- that were submitted

21   via EDI, part of the order volume submitted for Test

22   12? And the answer is, yes.

23   Question 8: Please explain the

24   verification that KPMG conducted of the process whereby

25   changes to Qwest's OSS and interfaces that impact order

1   flow-through are communicated to the organization that

2   is responsible for the maintenance and publication of

3   the Qwest LSRs eligible for flow-through document. And

4   to use our favorite acronym, this is the black box

5   test, and we did not assess the internal distribution

6   of documentation or information internal to Qwest.

7   Question 9: Are the 331 orders that was

8   submitted via IMA GUI part of the order volume

9   submitted for Test 12? And the answer is, yes.

10   WorldCom Question 1 --

11   MS. ANDERSON: This might be a good time

12   to take a break.

13   MR. DELLA TORRE: Given personnel, and the

14   time on the clock, we'll take our break now.

15   (Recess.)

16   MR. DELLA TORRE: We just want to start

17   off with a clarification, from our discussion moments

18   ago, about flow-through and nonflow-through USOCs. The

19   LSR flow-through eligible document does not, in fact,

20   have a list of USOCs that do and do not flow. What

21   this is is a description of order types, transaction

22   types, different transaction activities that could be

23   submitted or transmitted that either do or do not flow.

24   So, there are then implications to the related USOCs,

25   to those scenario types that will and will not

1   flow-through.

2   MR. WEEKS: So you take the language from

3   the document and drop it into the USOC finder, and it

4   gives the list of one or more USOCs that fit that

5   category. So, you can get to the USOCs. It's a

6   two-step process not one-step process.

7   MR. FINNEGAN: Is there a reason why it

8   couldn't have been a one-step?

9   MR. WEEKS: Qwest would have to answer

10   that.

11   MR. FINNEGAN: Well, from a testing

12   perspective, the documentation was found by KPMG to

13   inaccurately describe what the rules were for

14   flow-through. Qwest made a documentation fix and

15   presumably KPMG found that fix acceptable.

16   MR. DELLA TORRE: No, not that it

17   inadequately described. We were able to establish our

18   expectation of flow-through.

19   MR. WEEKS: It was inaccurate, not

20   inadequate.

21   MR. DELLA TORRE: Correct.

22   MR. WEEKS: There were situations that

23   the original document led us to believe would flow

24   through. Subsequent test activity revealed that that

25   list was not accurate. The list was revised in the

1   document. The list was flow through. And if you want

2   to translate what appears in the document to actual

3   USOCs, there's a tool to do that that Qwest provides.

4   So, the activities that a CLEC needs to

5   perform, in order to get from the flow-through document

6   to the USOCs is not cumbersome or arcane or anything

7   else. It's very usable, and could there have been

8   one-stop shopping? The answer is, yes. There could

9   have been, but we didn't feel, in our opinion, that

10   having two steps, instead of all having to submit a

11   single document, was unacceptable.

12   MR. FINNEGAN: Did KPMG, to establish

13   their expectation, use the two-step process?

14   MR. WEEKS: I think that would be a true

15   statement.

16   MR. DELLA TORRE: Yes. Okay. Let's move

17   forward with WorldCom questions for Test 13.

18   WorldCom No. 1: If the CLEC order is

19   electronically submitted, and Qwest's system

20   electronically returned a reject, with no manual

21   intervention, is the order considered flow-through or

22   nonflow through? In fact, it is nonflow-through

23   eligible, because it had an error on it. So, it's not

24   actually categorized as a flow-through or

25   nonflow-through order, because of an error.

1   Question 2: Did flow-through orders,

2   which were included in this evaluation, contain error

3   conditions which resulted in electronically returned

4   reject notices? And the answer is, yes.

5   Question 3: What --

6   MS. OLIVER: Becky Oliver, WorldCom. I

7   guess I expected you to say, in response to Question 2,

8   it was not applicable, because, if I understood the

9   response to Question 1, you are saying that if an order

10 has an error, it's nonflow-through eligible. So --

11   MR. DELLA TORRE: Well, qualification or

12 the categorization, rather, of flow-through or

13 nonflow-through would not be relevant in an order that

14 has an error and is subsequently rejected. It becomes

15 a nonflow-through eligible, because of the error

16 condition. Did we submit orders that had intentional

17 errors on them to confirm that they then, in fact,

18 rejected? The answer is, yes.

19   MS. OLIVER: Okay. Thanks.

20   MR. DELLA TORRE: Sure. Question 3: What

21 criteria served as the basis for determining

22 flow-through in the flow-through reports that Qwest

23 provided, i.e., that the LSR flowed to SOC without any

24 manual intervention. And we feel that the order

25 conditioned to that question is actually the response;

1   the basis for determining flow-through in the

2   flow-through reports was that the LSR flowed to SOC

3   without any manual intervention.

4   MR. WEEKS: That's our understanding.

5   Qwest is the actual author of that report. And, so,

6   Chris, or someone else, do you want to confirm that

7   that's how you made those decisions?

8   MR. VIVEROS: Chris Viveros, Qwest.

9   That's exactly how the report was developed, was a

10   daily extract of a special run of the data that's

11   collected for producing our PO-2 measure.

12   MR. DELLA TORRE: Question 4: How did

13   KPMG Consulting evaluate the accuracy of flow-through

14   reports that Qwest provided? We verified the accuracy

15   of the flow-through reports by comparing our expected

16   results with the actual results. And, in those cases,

17   where a discrepancy occurred or could not be explained,

18   KPMG Consulting issued an observation or an exception.

19   Question 5: When an order, which was

20   originally thought to be qualified for flow-through,

21   was found to be nonflow-through, due to an error in

22   Qwest's documentation, did KPMG Consulting oversee and

23   confirm that Qwest made the needed corrections to the

24   documentation? The answer is, yes.

25   MR. WEEKS: We didn't oversee, but we did

1   confirm.

2   MS. OLIVER: Okay.

3   MR. DELLA TORRE: Good distinction.

4   Question 6: How often, during the course

5   of KPMG Consulting's flow-through evaluation, were

6   corrections to Qwest's flow-through documentation

7   needed, excluding flow-through documentation updates

8   made as a result of an implemented business rule or

9   system change.

10   MR. WEEKS: Every Wednesday.

11   MR. DELLA TORRE: There were six

12   flow-through documentation versions that had changes

13   and/or corrections throughout the course of the test,

14   Versions 2.0 through 7.0. There's only one case in

15   which we can confirm that the change was made in direct

16   response to an exception.

17   Question 7: Did KPMG Consulting take

18   into consideration nonflow-through ordering?

19   MS. OLIVER: Excuse me, can I just --

20   MR. DELLA TORRE: Certainly.

21   MS. OLIVER: Follow-up on Question 6.

22   Becky Oliver, WorldCom. Was -- I didn't follow the

23   last part of the response; that KPMG confirmed that

24   just one of those six flow-through documentation

25   updates was the result of an exception. How does that

          1   relate to the response to the previous Question No. 5,

          2   that KPMG confirmed that the corrections were made to

          3   the documentation? Were those version updates, then,

          4   didn't it correlate to correction of documentation?

          5   MR. DELLA TORRE: Well, you have an

          6   exclusion in your question. And we would respond by

          7   saying that all of the other documentation updates,

          8   other than the one that we cited here, were the direct

          9   result of system updates or business rule changes that

         10   occurred during the course of the test, which is the

         11   exclusion that you have in your question.

         12   MS. OLIVER: Okay. I don't think I

         13   said -- probably didn't do a good job of explaining the

         14   exclusion there, because I am reading it now, and I can

         15   see where it's confusing. What I meant to exclude was

         16   documentation updates that were the result of, say, a

         17   new IMA release, something outside and separate from

         18   the order flow-through evaluation.

         19   MR. WEEKS: Yeah. I think the way we

         20   took the question to mean, was the sole reason for the

         21   new document was the observation or exception. And, in

         22   other cases, there is more than one reason why that

         23   document release came out. So, some of those other

         24   reasons you included in your exclusion there.

         25   MR. DELLA TORRE: We can confirm, as I

1   said originally, that there were six documentation

2   versions. How many specific changes were contained

3   within each version? We do not have that number.

4   MS. OLIVER: Okay. That's fine. Thanks.

5   MR. DELLA TORRE: Question 7: Did KPMG

6   Consulting take into consideration nonflow-through

7   ordering scenarios when determining the accuracy of

8   Qwest's existing flow-through documentation? The

9   answer is, yes. We established our expected

10   flow-through results for all of our test scenarios and

11   LSRs submitted as a result.

12   Question 8: Did KPMG Consulting evaluate

13   how the percentage of orders submitted via IMA EDI,

14   which did not flow-through, impacts CLECs. The answer

15   is, no.

16   Question 9: Clarify if the inaccurate

17   flow-through indicators, which caused some resale UNE-P

18   and UNE-L and standalone IMA EDI orders, which were

19   expected to flow, to drop out, refers to flow-through

20   indicators within Qwest's documentation. And that is

21   not exactly correct. The flow-through indicators that

22   we're referencing here are the daily Qwest flow-through

23   reports that we received as part of the test design.

24   MR. WEEKS: It's just -- there's

25   indicators on that special report that you would

1   receive. And sometimes, what Qwest reported to us in

2   those special reports, was not accurate. That's what

3   we're referring to in that section of the report.

4   MR. DELLA TORRE: Question 10: How is it

5   decided when to implement system changes to provide IMA

6   EDI resale flow-through, as indicated on Qwest's

7   documentation, and when to update Qwest's documentation

8   to correct flow-through as documented. And, in fact,

9   we have no insight into Qwest's decision-making process

10   for selecting or implementing fixes to identify

11   problems, whether they chose to change documentation or

12   systems. We would only know as an end result. We

13   would not know why they made that decision initially.

14   And, in fact, that answer applies to -- that answer

15   applies to Questions 10, 12, 14, 19, 21, and 22. There

16   will be a quiz at the end.

17   MR. WEEKS: Want us to go through those

18   numbers again, so you can keep track as you go?

19   MR. DELLA TORRE: I would take them off as

20   we go through.

21   For Question 11: Did KPMG Consulting

22   identify the root cause for the errors included in the

23   Qwest flow-through reports for the IMA EDI resale

24   orders? If so, what was the root cause. In fact, we

25   did not do any root cause analysis of errors contained

1   on the Qwest flow-through report. And, again, that's a

2   repeating question for -- the same answer would apply

3   to Questions 11, 13, 15, 16, 20, 23 and 24.

4   MS. OLIVER: Becky Oliver, WorldCom.

5   What was the reason for just saying there's an error

6   and leaving it at that, rather than investigating it

7   and determining the root cause? It seems like an error

8   on the flow-through report would indicate some error or

9   problem in how Qwest is capturing and tracking

10   flow-through.

11   MR. WEEKS: It's not how they capture and

12   track flow through, per se. It's how they report to us

13   what -- how a particular order behaved, since that was

14   kind of an ad hoc report; that was created especially

15   in -- dynamically to the test. It wasn't a systematic

16   part of Qwest's normal reporting. We wouldn't have

17   held it to any kind of standard like that.

18   MR. DELLA TORRE: Additionally, there may

19   be some assertions made by Qwest as to what the

20   underlying root causes may have been for the problems

21   encountered with the flow-through report. We're

22   attempting to uncover an observation or exception

23   number that would point you to Qwest's response as to

24   identifying potential root causes. So, let's just get

25   into an accounting, while we are looking for that, of

1   the following questions. Thirteen was covered.

2   Fourteen was covered. Fifteen and 16 were covered.

3   Seventeen and 18, 19, 20, 21, 22, and I think we might

4   be done with 23 and 24.

5   MR. DIXON: Mike, Tom Dixon. Can you

6   just run through the cross-reference questions? I know

7   you said they are done, just so we can --

8   MR. WEEKS: Let's take them all.

9   MR. DELLA TORRE: We'll go through that

10   again. The answer provided to Question No. 10 was that

11   we did not have insight into Qwest's decision-making

12   for determining whether it was a system or

13   documentation error. Those relate to Questions 12, 14,

14   19, 21, and 22.

15   MR. WEEKS: So those 10, 12, 14, 19, 21

16   and 22 are all the same answer.

17   MR. DELLA TORRE: And the same process is

18   true for Question No. 11. The response that we did not

19   assess impact to CLECs is also true for Questions 13,

20   15, 16, 20, 23, and 24.

21   MS. THIELEMANN: That leaves 17 and 18,

22   right? I was circling when you were saying those.

23   MR. DELLA TORRE: Yes.

24   Question 17: Did KPMG Consulting

25   evaluate how the percentage of orders submitted via IMA

1   GUI, which did not flow-through, impact CLECs? Answer

2   is, we did not. And 18 --

3   MS. THIELEMANN: Is it still the same as

4   other earlier questions? There was a different earlier

5   question.

6   MR. DELLA TORRE: We covered 17 and 18 as

7   well. Just back to that other issue. As a reference

8   point, Exception 3119. I believe there was a

9   discussion there for inaccurate flow-through reporting.

10   Other questions on Test 13?

11   Okay. Give us a moment to switch up

12   personnel, and we'll move to Test 23.

13   (Pause.)

14   MS. ANDERSON: Okay. So, I think we're

15   ready to roll.

16   MR. DELLA TORRE: Okay. Folks, we want to

17   get started with Test 23. So, let's start with the

18   Washington questions for Test 23.

19   MR. WEEKS: Test 23 pretty much kind of

20   split half and half and half. Five of the evaluation

21   criteria were in the report as unable to determines,

22   and almost all of those are recommended to be concluded

23   as closed inconclusive on 3110, 3111, or closed

24   unresolved on 3094. That was stated at the time we

25   produced the draft final report.

1   Subsequent to that date, 3110, 3094,

2   Qwest asked us to reopen those, and they are still

3   open, as we speak. So, the results there could move

4   from unable to some other state, pending the outcome of

5   the retesting activities. And there are not

6   state-specific results to report in this particular

7   test. Any follow-up questions on this?

8   MR. DIXON: Mike, Tom Dixon from

9   WorldCom. When did you anticipate completing the

10   retesting of those two exceptions?

11   MR. WEEKS: It will be this week.

12   MR. DIXON: If you know.

13   MR. DELLA TORRE: Our last opportunity is

14   this Friday.

15   MR. DIXON: Thank you.

16   MR. WEEKS: By completion, I am kind of

17   hedging my bet here. We're going to cut it off as of

18   Friday, and whether we're complete or not, it gets cut

19   off.

20   MS. TRIBBY: Can you give the

21   observations or exceptions again?

22   MR. WEEKS: 3110 and 3094.

23   MR. DELLA TORRE: Both exceptions.

24   MR. WEEKS: Both Es.

25   MR. DELLA TORRE: We will begin with the

1   WorldCom set of questions.

2   Question No. 1: Has Qwest accepted the

3   Colorado decision that PID/PAP changes are excluded

4   from the regulatory change definition for all 14

5   states? The answer is, yes.

6   Question 2: Are regulatory and industry

7   guideline changes now subject to prioritization by

8   CLECs? The answer is, yes. If so, please describe

9   KPMG Consulting's understanding of the prioritization

10   process for regulatory and industry guideline changes.

11   Regulatory and industry guideline changes are subject

12   to prioritization with Qwest, and CLECs, under certain

13   conditions, as specified in the draft CMP document.

14   Additional detail only if the change is not mandated to

15   be implemented in the next release, and there is some

16   flexibility for when the change is required or

17   recommended to go into effect.

18   In addition, either a CLEC or Qwest may

19   initiate a regulatory or industry guideline change,

20   with substantiating material. That comes from Section

21   5.1 and 10.1 of the master red-line CMP document.

22   Question 3: Please describe KPMG

23   Consulting's understanding of the SCRP, and how is it

24   an exception to the prioritization process. SCRP

25   refers to the Special Change Request Process. It is

1   our understanding that Qwest and CLECs have agreed that

2   if a system CR, deemed critical to either Qwest or

3   CLEC, has not been ranked high enough during the

4   prioritization process, a party may choose to pay for

5   the cost of hiring additional resources so that the CR

6   will be implemented with our prioritized CRNA upcoming

7   software release.

8   Question 4: Has the SRCP or SCRP, been

9   used during your evaluation of CMP? The answer is, no.

10   Question 5: The answer to the previous

11   question is, no; and, therefore, not applicable.

12   Question 6: Did KPMG Consulting observe

13   the, "packaging" process used by Qwest after CRs were

14   prioritized? The answer is, yes.

15   Follow-on question: If the answer is,

16   yes, what did KPMG Consulting observe and did Qwest

17   comply with the identified process? Qwest conducted

18   packaging activities for IMA Release 10, prior to Qwest

19   and CLECs completing the discussions and negotiations

20   about the prioritization process. Hence, KPMG

21   Consulting was unable to observe Qwest's adherence to

22   the complete end-to-end prioritization process for

23   major system release as defined by the redesigned CMP.

24   So, there is packaging, but we have not seen it, start

25   to finish.

1   Question 9 -- actually, Question 8: Did

2   KPMG Consulting observe the process for changing an

3   existing EDI interface? The answer is, yes.

4   Follow-on question: What did KPMG

5   Consulting observe and did Qwest comply with the

6   identified process? KPMG Consulting observed that,

7   prior to April 2002, Qwest did not consistently comply

8   with the identified process. As a result, we raised

9   Exception 3110 for results around IMA 6.0 and 9.0

10   interval adherence. And, as discussed by Mike earlier,

11   Exception 3110 remains open; and, therefore, we have

12   not completed our evaluation of the issues identified

13   in this exception.

14   Question 10: Did KPMG Consulting

15   evaluate the WSHD activities in support of production

16   support? And the answer is, yes.

17   Follow-on question: What did KPMG

18   Consulting observe, and did Qwest's WSHD comply with

19   the identified procedures and processes? WSHD

20   activities were evaluated as part of Test 24.7,

21   although specifically the production support issues

22   were considered as part of change management or Test

23   23. We did identify issues related to the production

24   support and issued Exception 3112, Observation 3073 and

25   Observation 3103. Observation 3073 and Exception 3112

1   are actually closed. Observation 3103 was closed as

2   inconclusive, as we were unable to verify the steps

3   that Qwest took to address the identified issue.

4   Question 12: Did KPMG Consulting

5   evaluate the interim process implemented on April 1,

6   2002, that governs Qwest's initiated product process

7   changes? At the time the draft report was released, we

8   had not evaluated the interim process. However,

9   beginning April 25, of 2002, we did evaluate the

10   modified interim process as part of the Exception 3094

11   retest activity, which is ongoing. That is also the

12   answer for Question 13.

13   Question 14: Please summarize any CLEC

14   comments about Qwest's redesigned CMP that KPMG

15   Consulting evaluated? We have not summarized any CLEC

16   comments, but we would refer any interested party to

17   the work paper set for additional information on

18   information provided to us by participating CLECs.

19   Question 15: Please summarize any HP

20   comments about Qwest's redesigned CMP that KPMG

21   Consulting evaluated? KPMG Consulting did not seek HP

22   comments about Qwest's redesigned CMP, as HP is not an

23   active participant in the CMP redesign activities.

24   Question 16: What essential components

25   did KPMG find are missing from Qwest's CMP? And as

1   that question is fairly high level, we would prefer to

2   refer you to the observations and exceptions listed in

3   each of the criteria of this report section.

4   MS. OLIVER: Becky Oliver, WorldCom. Can

5   I go back and ask a follow-up on Question 14? The

6   response refers parties to work papers, and said that

7   no summary was done on the CLEC comments. Does that

8   mean that we will -- let me just put it this way: How

9   did KPMG then use the CLECs' comments that exist in the

10   work papers?

11   MR. DELLA TORRE: As part of our testing,

12   we interviewed a number of CLECs with regard to the

13   Change Management Process. However, as this scope of

14   the Vendor Technical Conference is the draft final

15   reports, and we have, in fact, different questions that

16   relate to specific CLECs and their input, as that is

17   really a confidential piece of information -- in fact,

18   I don't recall the question.

19   I recall a question from Montana

20   yesterday, I believe, where we are willing to provide

21   that information specifically to the Montana staff and

22   commission off-line. WorldCom has every right to

23   review the work papers and assess that. But as that

24   information is not contained in the draft final report,

25   it's not a question to be addressed in this technical

1   conference.

2   MR. WEEKS: I can give you a general

3   answer as to how we use that information, and there are

4   several places in our report where we describe that

5   use.

6   Fundamentally, what we do when we

7   interview CLECs is try to understand what questions or

8   issues or problems or concerns that CLECs have with

9   whatever document or process or interface that is under

10   review. And we take that under advisement and factor

11   those things into the work that we do, and the

12   evaluations that we make, and the types of questions

13   and investigations that we do. So, there's not a

14   specific reliance in the sense that our result is based

15   upon that input in a direct way. It's more of a, what

16   sort of things should we be thinking about as we go

17   through this. And, you know, it's an attempt to make

18   sure we haven't missed my issues or missed any topics.

19   MR. DIXON: Is this on? Okay. This is

20   Tom Dixon. With respect to Question 15, which you were

21   just on, you have indicated you did not seek any

22   comments from HP. And that caused me some confusion,

23   because, in the last paragraph of Section 2.4, under

24   evaluation methods for this test, it says, "KPMG

25   consulting also interviewed Hewlett Packard Consulting

1   representatives who were knowledgeable about Qwest's

2   CMP."

3   So, it seemed to me that your answer is

4   inconsistent with what's stated here.

5   MR. DELLA TORRE: The difference being

6   that's the redesign, where that -- the interviews that

7   we're referencing are much earlier in the process.

8   MR. DIXON: Thank you.

9   MR. DELLA TORRE: And just as a matter of

10   point. For the CLEC participation in the redesign

11   effort, those are contained in publicly available

12   minutes, and I can't reference the Website, but I am

13   sure Andy can.

14   MR. CRAIN: Actually, I am sure Judy can.

15   MS. SCHULTZ: It's

16   HTTP://www.Qwest.com/wholesale/CMP. And then if you

17   go -- if you click on "redesign," that's where the

18   information resides.

19   MR. WEEKS: That's a useful

20   clarification, because a lot of what we perceive CLECs

21   think about the Change Management Process has been

22   derived, not from private conversations in back rooms,

23   but from sitting and listening to the CLECs in this

24   open forum.

25   MR. DELLA TORRE: Question 18: Describe

1   the disagreement between Qwest and CLECs regarding the

2   scope and effective date of incremental changes

3   implemented through the redesign meetings. And, again,

4   this really isn't the subject of the report, but,

5   rather, is a subject for the redesign sessions, and we

6   would refer folks to that same forum.

7   Question 19: It is WorldCom's

8   understanding that KPMG Consulting is conducting a

9   retest of matters addressed in Exception 3094. If so

10   please provide the extent and any results of the

11   retest. As mentioned earlier, this is ongoing.

12   Question 20: Is KPMG conducting any

13   retesting of matters raised in Exception 3111? If so,

14   please provide the extent and any results of the

15   retest. And the answer is, we are not conducting any

16   retest activities for Exception 3111. It remains

17   closed, inconclusive.

18   Question 21 is the same question, but

19   regarding Exception 3110. And, again, the retesting

20   efforts are ongoing.

21   Question 22: To the extent KPMG

22   Consulting is retesting any matters relevant to Test

23   23, did KPMG seek any further CLEC input? And to

24   expand on or emphasize Mike's point moments ago, we

25   continue to incorporate CLEC positions on these matters

1   through the public forum of the redesign sessions, but

2   we have not sought any additional independent meetings

3   or interviews with the CLECs; therefore -- that covers

4   Question 23.

5   Question 24: To the extent KPMG

6   Consulting is retesting any matters relevant to Test

7   23, did KPMG Consulting seek any further HPC input?

8   And the answer is, no, which covers, also, Question 25.

9   Question 26: Is KPMG Consulting

10   conducting any other retests of matters relevant to

11   Test 23? The answer is, no.

12   Turning to AT&T Question No. 1: KPMG

13   states, "The above four change types became effective

14   in late 2001." Is it correct that the four change

15   types were defined as CMP change type categories in

16   late 2001? And the answer is, yes. The four change

17   types were defined as CMP change type categories in

18   late 2001.

19   MR. WEEKS: September 20th is late.

20   MR. CONNOLLY: We're looking for, you

21   know, that sort of time frame. I guess, part of the

22   question is that it's our understanding that CLECs

23   would make requests for change along these lines. They

24   may not have been categorized as those as far as

25   discipline of the CICMP went, but, nonetheless, the

1   questions came forward. So, direct, formalized

2   categorization of those; that occurred with the --

3   September 2001?

4   MR. WEEKS: I think the formalization of

5   the four categories was roughly September 20th.

6   MR. CONNOLLY: Great. Thanks very much.

7   MR. DELLA TORRE: Question 2: Please

8   provide the list of the parties that stipulated to the

9   CMP requirement for procedures to contact the CLEC when

10   Qwest declines a CLEC-initiated CR. Again, we would

11   refer folks to the Qwest wholesale Website, and the CMP

12   redesign sessions, which are recorded and distributed

13   via E-mail, also made available on the Website.

14   MR. WEEKS: The public records where

15   we're going to reference you to, we don't have that

16   list.

17   MR. CONNOLLY: It is it your

18   understanding there was a stipulation among the

19   parties?

20   MR. WEEKS: (Nodding in the affirmative.)

21   That's our understanding.

22   MR. YEUNG: Yes.

23   MR. WEEKS: By stipulation, we don't mean

24   that in the legal sense. We meant agreement.

25   MR. CONNOLLY: And this statement here

1   means that that is documented -- that procedure is

2   documented with the CMP?

3   MR. YEUNG: Yes.

4   MR. WEEKS: Yes. That's our

5   understanding.

6   MR. CONNOLLY: Thanks.

7   MR. DELLA TORRE: Question 3: Please

8   explain the testing that KPMG Consulting conducted to

9   verify that changes are not made to Qwest's OSS that

10   have impact on CLEC systems and operations where no

11   notice is provided to CLEC. We did not conduct

12   exhaustive testing activities to specifically uncover

13   unnoticed or nonnoticed CLEC impacting changes. We did

14   become aware of such changes through CLEC reports, and

15   by observing the P-CLEC, and reviewing HP observations

16   and exceptions related to this type of condition.

17   KPMG formally identified an Observation

18   3066; that Qwest did not consistently inform CLECs of

19   CLEC-impacting changes in the point release versions of

20   IMA. We also identify an Observation 3074; that Qwest

21   did not notify CLECs of changes that resulted from the

22   bill rate validation.

23   MR. WEEKS: Look at 23/6, criteria. We

24   outlined some of that.

25   MR. DELLA TORRE: However, we did not

1   validate non or unnoticed conditions in any exhaustive

2   way.

3   MR. DIXON: Joe, what was the first cite?

4   The first exception --

5   MR. DELLA TORRE: Observation 3066 and

6   Observation 3074.

7   MR. DIXON: Thank you.

8   MR. DELLA TORRE: Other questions on Test

9   23? Thank you all.

10   MS. ANDERSON: Well --

11   MR. WEEKS: Shall we start on tomorrow?

12   MS. ANDERSON: I was just going to

13   suggest that, because we have a full day tomorrow.

14   Would HP be prepared to maybe knock off Number 24.8?

15   MR. DIXON: How about 24.6?

16   (Discussion off the record.)

17   MS. ANDERSON: Give us a minute here.

18   Okay. We have a plan. Unfortunately, Tom, we are

19   short a body that would be required for this, and, so,

20   we won't be able to comply with your request.

21   MR. DIXON: Maybe I will just listen in

22   by phone tomorrow.

23   MS. ANDERSON: So, what we can do is

24   24.7. So, KPMG is going to dive into that here, in a

25   moment.

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 1                    MR. DELLA TORRE:  Okay.  We'll get started

 2      with Test 24.7.  And I suppose we can start with AT&T

 3      questions for 24.7.  I hear a lot of paper shuffling,

 4      so I will wait a couple of minutes while people get

 5      squared away.

 6                    Okay.  You know, we can probably get

 7      started on 24.7, with the Washington questions.

 8                    MR. WEEKS:  24.7, all of the criteria are

 9      satisfied, so there's nothing that falls into any of

10      the categories.  I think you are interested in having

11      us talk about, if they existed.  There are not any

12      Washington specific rules as -- to report on this.  And

13      there aren't any open observations or exceptions on

14      this.

15                    MR. DELLA TORRE:  Okay.  Great.  AT&T

16      Question No. 1:  AT&T notes that there are several

17      appearances of "WHSD" in the section that should be

18      changed to "WSHD."  We will make that change.

19                    Question 2:  In what way does the

20      escalation of a trouble ticket affect the severity

21      level originally assigned to the trouble ticket?  And

22      it's our understanding that those are two independent

23      activities, the assignment of a severity level and the

24      escalation.  The escalation can be initiated by either

25      the call rep or the CLEC.  But it is the handler of
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1   that ticket that assigns the severity code, and those

2   are, in fact, two independent activities.

3   MR. CONNOLLY: Is it the case that a

4   severity code -- a severity level can be changed by

5   subsequent handlers of that trouble ticket?

6   MR. DELLA TORRE: Yes. Question 4:

7   Please describe the Help Desk Management Review Process

8   that was observed by KPMG Consulting. Provide KPMG

9   Consulting's evaluation of the adequacy of the Help --

10   I skipped 3.

11   MR. CONNOLLY: Back to 3.

12   MR. DELLA TORRE: My apologies. What

13   processes and procedures are involved in the changing

14   of the severity level of a trouble ticket? And, during

15   the initial trouble call, if the HDP confuses the

16   assigned severity level, with the caller, Qwest will

17   change the severity level of that trouble ticket, if

18   the HDP made a mistake in categorization.

19   MR. WEEKS: The CLEC can also initiate a

20   request to have the severity level modified as well.

21   MR. CONNOLLY: So, in the case of --

22   let's take the escalation process, because that's

23   probably fairly typical for this scenario; that the

24   service problem is such that CLEC calls and raises the

25   temperature. During that interchange, CLEC says,

1   what's the severity level that you have on the ticket.

2   And insists that it be raised to increase that

3   recognition within the Qwest system. That could, in

4   fact, happen?

5   MR. WEEKS: It could happen.

6   Fundamentally, what that severity level is intended to

7   do is communicate the impact on the CLEC for the

8   problem, as it's reported, at the time it's reported.

9   And, usually, escalation is because the CLEC doesn't

10   believe they are getting the response they need on a

11   timely basis. Those two can move together, as you are

12   suggesting, as Joe said, can be orthogonal, as well as

13   impact on business is the same. And what I said, I

14   said, change the severity, but we're not changing the

15   severity. We want to escalate. We don't feel like

16   we're getting the level of the response that we want.

17   It can move together or move independently.

18   MR. CONNOLLY: Is it your understanding

19   that severity level is -- has some impact or has

20   some -- Qwest has a way of treating all severity levels

21   essentially the same. As the water level for this one

22   raised to a higher severity level, would it also be a

23   Qwest factor, not just a matter of how important it is

24   to that CLEC?

25   MR. WEEKS: I think you are asking if

1   there's a triage process, where the patients that are

2   more terminal get handled before the ones that are just

3   kind of slightly sick. Is that the question?

4   MR. CONNOLLY: Yes.

5   MR. WEEKS: I think the answer is, yes,

6   that they do. They work the higher severity problems

7   on a -- more aggressively than they work the lower

8   severity problems.

9   MR. CONNOLLY: I'm just trying to clear

10   up -- you had said that the severity level reflects the

11   importance or significance of that trouble to the CLEC.

12   It also has an --

13   MR. WEEKS: -- implication as to how it

14   gets handled inside Qwest.

15   MR. CONNOLLY: How they work it. Great.

16   Thanks.

17   MR. DELLA TORRE: That would be by

18   referring it to different personnel, more so than

19   putting it higher in the queue for the same personnel.

20   MR. CONNOLLY: Understand.

21   MR. DELLA TORRE: Question 4: Please

22   describe the Help Desk Management Review Process that

23   was observed by KPMG Consulting. Provide KPMG

24   Consulting's evaluation of the adequacy of the Help

25   Desk Management Review in terms of contribution to

1   quality-of-service principles, in general, and to meet

2   KPMG Consulting's reasonable standards for process

3   competence. We would refer you, in Section 3.1 of the

4   report, to criteria 24.7.8, 24.7.11, and 24.7.13.

5   MR. WEEKS: These are various aspects of

6   sort of the management controls that we saw, or we were

7   looking for, as we went through it. So, 24.7.8 says

8   the process includes procedures for tracking status

9   management reporting and management intervention. And

10   in the comment section there, it talks about Qwest Help

11   Desk Managers utilize call management reports from the

12   ACD, and so on. That's one of the criteria, where we

13   look at the -- sort of what management controls exist

14   on top of the fundamental baseline process that's in

15   place. So that's 8.

16   Eleven talks about process performance

17   measures are defined, measured and reviewed. This is

18   where I hate to call it, "standard," but expectations

19   are set for how the process needs to operate. And

20   there's control feedback loops where the management

21   team is looking at how the process operates to make

22   sure that the process is meeting the goals.

23   And 13 talks about process improvement

24   responsibilities are assigned and applied. So, this is

25   some sort of commitment, on the company's part, to

1   continuous improvement mechanisms so the process gets

2   better and better. So, those are the aspects that we

3   specifically evaluated, that we think address the

4   question you asked. Is there something beyond that?

5   MR. CONNOLLY: No. What I was trying to

6   get at was an understanding of the management model,

7   the paradigm that you had structured. And it seems

8   what you suggested was, going through your evaluation

9   criteria gives the reader an --

10   MR. WEEKS: Appreciation.

11   MR. CONNELY: -- an appreciation of what

12   that --

13   MR. WEEKS: Kind of a management

14   paradigm.

15   MR. CONNOLLY: All right. Thanks.

16   MR. DELLA TORRE: Question 5: Please

17   explain the reasons the CLEC receives a new trouble

18   ticket number in the case of a need to seek further

19   resolution of an earlier reported trouble ticket. If

20   the CLEC issue reported on the initial call was not

21   successfully resolved, the CLEC is given a trouble

22   ticket number to reference for a requesting trouble

23   status. And the issue here is, really, whether the

24   ticket is open or closed. If a trouble ticket is

25   closed, then any future calls that may relate to that

1   issue raised in the original trouble ticket, because

2   the first trouble ticket was closed, a new trouble

3   ticket will be issued. If, however, the original

4   trouble ticket that was opened is not closed, then that

5   certainly continues to be the reference. And the

6   closure of that initial ticket is made in conjunction

7   and agreement with the CLEC during that call.

8   MR. WEEKS: In other words, Qwest doesn't

9   unilaterally close the tickets.

10   MR. DELLA TORRE: Once it's closed, you

11   will get a new number, if you call again later.

12   MR. CONNOLLY: I was concerned about the

13   circular nature that's conveyed by this statement; that

14   if the CLEC calls to escalate or inquire about an

15   existing ticket, why would there need to be another

16   ticket issued?

17   MR. WEEKS: There won't.

18   MR. CONNOLLY: It indicates that, where

19   that prior ticket had been closed --

20   MR. WEEKS: By agreement with the CLEC.

21   MR. CONNOLLY: -- that a new trouble

22   ticket --

23   MR. WEEKS: So, I thought I had the

24   problem fixed. I agreed to close the problem. I

25   subsequently discover it doesn't look like it's really

1   been fixed, or I am seeing the same problem occur again

2   in another context. So, I am going to call, and, to

3   me, it seems the same, because I mechanically agreed to

4   close out the first ticket. Then Qwest, rather than

5   reopening that previous ticket, establishes a new

6   ticket.

7   MR. DELLA TORRE: Question 6: In those

8   cases where a patch is issued to resolve an operational

9   problem, what are the procedures that are to be

10   followed to record the underlying problem in a Change

11   Request and have that CR become the requisition for

12   permanent correction? What is KPMG Consulting's

13   evaluation of the Qwest procedures that deal with

14   resolving patch issues into CRs?

15   And there are several different reference

16   points that I would like to provide for you here, and

17   then we can go through some of them for a little bit

18   more color. For Test 23, Section 2.1.1. For Test

19   24.7, Section 3.1, Criteria 24.7-7. And in Test 24.6,

20   Section 3.1.1, Criteria 24.6-1-15. And there are

21   different components of the patch to CR process

22   discussed in each of those different areas. So we can

23   go through those now, if you like, or you could review

24   those and ask subsequent questions later.

25   MR. CONNOLLY: Does KPMG see these

1   patch --

2   MR. WEEKS: The request is closed as

3   patches go over into change management.

4   MR. CONNOLLY: As a patch is necessary,

5   and throw it into --

6   MR. DELLA TORRE: Internal CR, yes.

7   MR. WEEKS: The leakage between we saw as

8   part of this test, which the heavy disposition of

9   trouble -- not trouble, but tickets being -- there

10   needs to be a software patch, a CR. As part of the

11   Change Management Process, we saw those kinds of

12   changes coming into the Change Management Process.

13   Those requests were -- for patches were patches coming

14   out of the Help Desk operations, coming into the change

15   management, in fact, are worked into the Change

16   Management Process.

17   MR. CONNOLLY: To apply the patch.

18   MR. WEEKS: Yes, or to consider the patch

19   in the way that it would normally be considered, in

20   light of everything else that's going on.

21   MR. CONNOLLY: Separate from the

22   implementation of the permanent fix to replace a patch.

23   MR. WEEKS: That would come through the

24   other Change Management Processes that already exist.

25   MR. CONNOLLY: Test 23?

1   MR. WEEKS: Right.

2   MR. CONNOLLY: These sort of patch

3   requests --

4   MR. WEEKS: The handoff, if you will,

5   between the Help Desk and the change management people

6   and software engineering people that sit behind the

7   Change Management Process, we saw all of those

8   handoffs.

9   MR. CONNOLLY: If we have a problem with

10   the system that necessitates a patch, which has the

11   implication to me that it's a quick fix, necessary for

12   a ticket, depending on the severity of the problem,

13   would that request for patch get processed through?

14   MR. WEEKS: It would be an internal CR.

15   MR. CONNOLLY: Does it go to CMP as a

16   CLEC request or as a Qwest change?

17   MR. WEEKS: Qwest internal CR.

18   MS. NOTARIANNI: Tim, I think the

19   assumption that a patch is a temporary fix is maybe a

20   semantics issue. A patch isn't necessarily a temporary

21   fix. And, in fact, in most cases, when they say it's a

22   patch, it's an, essentially, a software bug they are

23   fixing.

24   So, I wouldn't make the assumption that

25   you started out with, that all patches are temporary,

1   and there needs, subsequent to that, to be a CR that's

2   introduced to make a more permanent fix.

3   MR. CONNOLLY: Okay. Thanks. To create

4   the patch, my understanding, we have to get some

5   analysts and programmers and sit down and write some

6   codes to implement the change that's necessary to

7   resolve the problem.

8   MS. NOTARIANNI: That's correct.

9   MR. CONNOLLY: Is the work that those --

10   that results from that, is that a dot release charge?

11   MR. WEEKS: In what context do they

12   implement those? Do they just slam them in or do they

13   wait for a dot release? How does that work?

14   MS. NOTARIANNI: This is the easy answer.

15   It could be either. It depends on what it is that is

16   being fixed. So, depending on the severity of it. If

17   it's something that, you know, your system is down and

18   you need to fix, and they need to put in that patch,

19   they are going to do it immediately, and it's not

20   really a patch point release. There could be things

21   that are -- such that they go into a package release.

22   MR. CONNOLLY: For the CRs -- for the

23   patches that are going to go into that package release,

24   are those prioritized amongst all other CRs for that

25   package release?

1   MS. NOTARIANNI: Yes.

2   MR. CONNOLLY: Are they brought in as

3   Qwest CRs?

4   MR. CRAIN: I think we need to clarify

5   that, for a point release, there is not a

6   prioritization process. And some things that end up in

7   point releases result from earlier prioritization

8   processes. Everything that goes into a point release

9   isn't necessarily part of a prioritization process.

10   How these changes in CRs are handled that result from

11   these problems has been fully worked out, and the

12   communications fully worked out in the change

13   management redesign process. Parties agreed upon that

14   process and how these are being handled, as part of the

15   Production Support Process that we implemented.

16   MR. CONNOLLY: What I am trying to make

17   sure I understand is that a CR is a CR is a CR.

18   There's not different types of CRs that go around the

19   CMP? Is that -- my understanding correct?

20   MR. CRAIN: An internal -- a CR for a

21   change to the interfaces is not necessarily the same

22   thing as changes that are made through the Production

23   Support Process.

24   MR. WOODHOUSE: Rick Woodhouse, KPMG

25   Consulting. Tom, our understanding is that a low

1   severity 3 or 4 patch release doesn't necessarily

2   become a CR unless the CLECs agree to it. There is a

3   list that is actually provided to the CLECs at the CMP.

4   And if a CLEC wants to champion one of those lower

5   severity changes, if everyone agrees -- if they agree,

6   they can actually terminate the CR. It doesn't

7   necessarily become a CR automatically.

8   MR. CONNOLLY: Is it your understanding

9   that a patch becomes a CR in all cases?

10   MR. WOODHOUSE: Not necessarily.

11   MR. CONNOLLY: Does the trouble report to

12   the Help Desk that causes a patch to be written require

13   a CR?

14   MR. WOODHOUSE: Do you mean external CR

15   or internal? Because you have to define, because the

16   term "CR" is used at Qwest both for internal changes as

17   well as external changes.

18   MR. CONNOLLY: For this case, where

19   there's a problem that a CLEC has detected, calls the

20   Help Desk or the right wholesale --

21   MR. WEEKS: Systems Help Desk.

22   MR. CONNOLLY: Needs to have a fix made

23   for this problem, or the Qwest technicians determine

24   that there's a need for a fix. That person generates a

25   CR and then the patch is written on the basis of that

1   CR?

2   MR. WOODHOUSE: I think the answer to

3   your question, if it is CLEC-impacting, it will go

4   through CMP. There is criteria set for determining

5   whether it is CLEC-impacting.

6   MR. CRAIN: Tim, a lot of confusion here

7   is, you are throwing around the term, "CR." And keep

8   in mind that everything in the world that is called a

9   "CR" internally at Qwest doesn't necessarily result in

10   a CR that is prioritized to the Change Management

11   Process. How some things are handled through the

12   Production Support Process is different from how things

13   are handled through the Change Request Process.

14   So, fixes that are handled through the

15   production support, and the communications that are

16   involved there, are handled in not necessarily the

17   exact same way as CRs, for the purposes of what CRs --

18   the term "CR" is used for in the Change Management

19   Process.

20   MR. WEEKS: Let me ask a question, based

21   on what Rick said. If there's a need for the patch

22   that is CLEC-affecting, because it changes the

23   definition of the interface, would there be an external

24   change-management-oriented CR generated prior to having

25   that patch introduced into the software?

1   MR. CRAIN: To be honest, we don't have

2   the person here from Qwest who really --

3   MR. DIXON: Jeff.

4   MR. CRAIN: Jeff will be here tomorrow to

5   address this, if we can come back tomorrow and address

6   this issue.

7   MR. WEEKS: Is that okay?

8   MR. CONNOLLY: That will be fine.

9   MR. DELLA TORRE: Okay. Question 7: KPMG

10   Consulting reports the Help Desk Standard Operating

11   Procedures included a defined set of procedures

12   available for HDPs to conference up to six parties on a

13   given Help Desk call. This option is only available if

14   the HDP has no other calls in the queue and has need

15   for additional support from other HDP or Subject Matter

16   Experts. Please provide an explanation for the

17   described "queue," and indicate whether this is a queue

18   for each HDP.

19   The term, "queue," refers to the number

20   of calls not yet answered and awaiting HDP's answer.

21   The queue, however, is available for all HDPs and not

22   one specific HDP.

23   MR. WEEKS: Basically, the ACDQ.

24   MR. CONNOLLY: That's what I was thinking

25   too.

1   MR. DELLA TORRE: Question 1 from

2   WorldCom: If the HDP is unable to resolve the issue

3   when the CLEC calls in the trouble, is the personnel at

4   the time -- is the issue, at the time, passed to Tier 2

5   or Tier 3 personnel, or does the HDP make additional

6   attempts to resolve the issue before transferring? The

7   answer is if the HDP is unable to resolve the issue, he

8   or she will transfer the ticket to Tier 2 or to Tier 3.

9   Question 2: How are Status

10   Notifications, both ticket and event, provided to

11   CLECs, and does the Help Desk track Status

12   Notifications? HDP provides status notifications for

13   individual trouble tickets through follow-up phone

14   calls made to the appropriate CLEC trouble ticket

15   contact. Status notifications for system events are

16   provide via E-mail to the CLEC community.

17   Additionally, CLECs may call the Help

18   Desk and select Option No. 2 for the listing of the

19   current system outage notifications. These

20   notifications are updated with the status for system

21   events affecting multiple CLECs. For both cases, the

22   Help Desk does track the status of those notifications,

23   or, rather, does track status notifications.

24   Question 3: What Qwest representatives

25   receive Help Desk Status Notifications? And those

1   status notifications are sent to the originating HDP.

2   Additionally, Qwest maintains an internal notification

3   system used to distribute status updates for system

4   outages via pager to various internal groups.

5   Question 4: Are Tier 2 and Tier 3

6   individuals dedicated to working on Help Desk issues?

7   There are Tier 2 and Tier 3 individuals assigned to

8   work on Help Desk issues.

9   MR. WEEKS: But they are not dedicated.

10   MR. DELLA TORRE: But they are not

11   dedicated.

12   MR. CONNOLLY: Sort of the laisser-faire

13   attitude about those people.

14   MR. WEEKS: No comment.

15   MR. DELLA TORRE: Question --

16   MR. WEEKS: They can have other job

17   assignments and responsibilities many times, especially

18   Tier 3 people are SMEs, and get roped into solving

19   particularly complex or thorny problems that they get,

20   either kicking or screaming, willingly, as it is, into

21   the resolution of a problem.

22   MR. DELLA TORRE: Question 5: Did KPMG

23   Consulting conduct its walk-through and observation of

24   Thornton's Help Desk location in a manner that was

25   blind to the Help Desk personnel? The answer is, no.

1   The fact that we were there means that they probably

2   know who we were.

3   MR. WEEKS: We had our Harry Potter

4   capes.

5   MR. DELLA TORRE: Question 6: Did the

6   Help Desk documentation include expectations or

7   guidelines for Tier 2 and Tier 3 support personnel?

8   The answer is, yes.

9   Question 7: During KPMG Consulting's

10   on-site Help Desk visit, in addition to verifying that

11   Qwest supplied CLECs with the ticket number at the time

12   the trouble was called in, did KPMG Consulting also

13   verify that Qwest provided the severity level of the

14   ticket to the CLEC at the time the trouble was

15   reported? The answer is, yes.

16   MS. OLIVER: We'll give it a try. Becky

17   Oliver, WorldCom.

18   (Discussion off the record.)

19   MR. DIXON: Let Joe calm down. He's

20   about as red as a beet.

21   MR. DELLA TORRE: Moving along.

22   MS. OLIVER: Follow-up on Question 6:

23   Can KPMG provide an overview of what the expectations

24   or guidelines are for the Tier 2 and Tier 3 support

25   personnel in the Help Desk documentation?

1   MR. DELLA TORRE: Yes. The Tier 2 and

2   Tier 3 support personnel have a reference guide, which

3   is -- establishes expectations and guidelines for

4   subjects, such as how to go about investigating the

5   trouble, providing status notifications, how to go

6   through escalations, how to go through the closure

7   procedure.

8   MS. OLIVER: Is there anything in those

9   guidelines that talks about prioritization or is it

10   first-come first-serve?

11   MR. WEEKS: The answer is yes, there is

12   information about prioritization.

13   MR. DELLA TORRE: Question 8: Did KPMG

14   Consulting's on-site Help Desk observations of periodic

15   status calls being provided for CLECs include an

16   assessment that status calls were occurring during the

17   specified status notification intervals? The answer

18   is, no.

19   Question 9: Approximately what

20   percentage of troubles reported by the P-CLEC were

21   resolved by the Tier 1 HDP as opposed to being resolved

22   by either Tier 2 or Tier 3 support personnel? And we

23   do not have the information to answer that question, as

24   we typically didn't generate those calls, and we did

25   not track who was answering those calls. I believe the

1   same can be said for HPC.

2   MR. MAY: That's correct.

3   MS. OLIVER: Becky Oliver, WorldCom.

4   Does the P-CLEC have some, based on your experience,

5   some idea of -- I mean, if you don't have an

6   approximate percentage, was it your experience that a

7   majority of the calls were resolved by the Tier 1 or

8   that the majority of the calls had to be referred to

9   Tier 2 and Tier 3?

10   MR. MAY: No. The P-CLEC does not have

11   that data.

12   MR. DELLA TORRE: Question 10: What

13   happens to IT troubles that are closed with the date

14   to-be-determined disposition code? Specifically, does

15   the Help Desk continue to track the issues until they

16   are resolved? Our answer is that the Help Desk does

17   not track the trouble ticket after it is closed.

18   MS. OLIVER: Becky Oliver, WorldCom.

19   Follow-up, then. I guess I am just -- this question is

20   trying to get a better understanding of the disposition

21   code date TBD, and what does that really mean for an IT

22   trouble being closed with that disposition code?

23   MR. DELLA TORRE: It is our understanding

24   that all troubles that are closed with the date TBD

25   disposition are actually moved into the CMP process.

1   MS. OLIVER: Can Qwest confirm that?

2   MS. NOTARIANNI: This is Lynn Notarianni.

3   That's also our understanding, but we certainly can go

4   back again and validate that. That was our

5   understanding of it as well.

6   MR. DELLA TORRE: Question 11: Did KPMG

7   Consulting evaluate the adequacy of the four

8   disposition codes used to close IT trouble tickets?

9   And the four disposition codes were the result of the

10   CMP redesign collaborative sessions, and we did review

11   those disposition codes and determine that the coverage

12   of those codes were adequate.

13   MR. WEEKS: By that, there weren't any

14   kinds of problems or issues that didn't fit reasonably

15   well into those four codes. That's not a statement

16   that, if we were to design ourselves, we might design

17   exactly that or something different. It's just kind of

18   a problem issue that we were aware of, could be put

19   into the code, and because it had been collaboratively

20   determined, we said, that's good enough.

21   MS. OLIVER: Understand.

22   MR. DELLA TORRE: Other questions on Test

23   24.7? Thank you very much.

24   MS. ANDERSON: Okay. I have been

25   informed by HP that you can jump into 24.8. Want a

1   two-minute break?

2   (Recess.)

3   MS. ANDERSON: Let's take our seats.

4   MR. MAY: Okay. Geoff May with HP. And

5   these are -- we're starting with AT&T questions on Test

6   Report 24.8.

7   Question No. 1: Please clarify the

8   origin of the term --

9   MR. DELLA TORRE: Questions 1 and 2 will

10   be deferred until tomorrow. Three, we can answer.

11   MR. MAY: Okay. Do you want me to read

12   it or do you want to read it?

13   MR. DELLA TORRE: Sure.

14   MR. MAY: Questions 1 and 2 are deferred.

15   Question 3: Please explain the testing that KPMG

16   Consulting conducted to verify that changes are not

17   made to Qwest's OSS that have impact on CLECs' systems

18   and operations where no notices were provided to CLECs.

19   HP defers to KPMG on this issue with their experience

20   and not only in this area.

21   MR. CONNOLLY: Maybe I can straighten out

22   a little confusion here. We provided two sets of

23   questions on 24.8. One set for KPMG and another set

24   for HP and its reports.

25   MS. ANDERSON: 24.8 on KPMG, we covered

1   that in the last test, No. 23, wasn't it?

2   MR. CONNOLLY: We did. We had supplement

3   questions that we provided in -- I think it was our

4   initial set of questions for VTC3. Page 40 of 41 are

5   questions for HP. Page 41 of 41 are questions for

6   KPMG. I said that exactly backwards. Forty of 41 are

7   KPMG Consulting's. Forty-one of 41 are HPs.

8   MR. DELLA TORRE: I don't follow the

9   numbering you are talking about.

10   MR. WEEKS: We're talking about page

11   numbers, not questions.

12   MR. DELLA TORRE: Those three were

13   intended to be sent to us, and we are not prepared to

14   answer Questions 1 or 2. Question 3 is actually the

15   same as Question No. 3 from Test 23, which was the no

16   notice question.

17   MR. WEEKS: We interpreted it that way.

18   Did we correctly interpret that?

19   MR. CONNOLLY: Yes, it got misfiled.

20   MR. DELLA TORRE: So, we can eliminate

21   Question No. 3 and Questions No. 1 and 2, we will do

22   our best to get answers for tomorrow.

23   MR. MAY: Okay. I now am referring to

24   the page that says, "Test 24.8, Question No. 1."

25   Please explain whether the specific responsibilities

1   listed are representative or all inclusive? If they

2   are representative, what means are employed in the ISC

3   to determine the extent to which the CLEC inquiries can

4   be answered without the ISC, or require escalation/

5   referral elsewhere. The responsibility list is from

6   information Qwest provides to CLECs on the Website, in

7   addition to a published Qwest notification. The source

8   of the Website information was the Qwest wholesale

9   customer contacts Version 7.01. The notification

10   information came on March 8th, 2002.

11   Question 2: Please explain the reasons

12   HP reports that system outages or connectivity issues

13   are to be reported to the ISC and not to the wholesale

14   systems Help Desk? Qwest states, on its wholesale

15   Website, under wholesale systems Help Desk, "While not

16   responsible for supporting functional how-to questions

17   concerning systems or applications, our wholesale

18   systems Help Desk is your single point of contact for

19   system-related questions regarding connectivity issues,

20   outputs and system outages. Qwest then provides the

21   ISC Help Desk number.

22   Question 3: Please provide the meaning

23   attached to the term, "extended waiting," as it is used

24   in this test cross reference? This sentence will be

25   revised in the final report to provide additional

1   clarification via HP.

2   WorldCom Question 1: Did the Sierra

3   Vista Call Center's responsibilities include providing

4   clarification for LSR business rules? HPC defers to

5   KPMG on this issue, for their experience and knowledge

6   in this area.

7   MR. DELLA TORRE: Okay. Questions 1 and 2

8   from WorldCom redirected to KPMG. Does the Sierra

9   Vista Call Center's responsibilities include providing

10   clarification for LSR business rules? The answer is,

11   yes.

12   And for the second question, how is the

13   severity level and, therefore, the response interval

14   for a CLEC's ISC ticket determined? The response

15   interval is actually assigned according to the reason

16   for which the CLEC initiated the call to the ISC. And

17   these reasons and associated intervals are published on

18   Qwest's wholesale Website.

19   MR. MAY: Question No. 3: Clarify if the

20   instances where the P-CLEC contacted the ISC more than

21   once were for escalation purposes, because the status

22   being provided by the SDC every two hours was

23   insufficient. Okay. The P-CLEC contacted the ISC for

24   several reasons. The circumstance identified here was

25   applicable in some, but not all cases. Where the

1   P-CLEC received a call every two hours, it was due to

2   an escalation. The P-CLEC operation center contacted

3   the ISC only when it was necessary for a timely

4   solution. However, escalations regarding multiple

5   instances were usually those such as USOC table errors,

6   missing LSR completion notices, or, as stated,

7   time-sensitive issues.

8   MS. OLIVER: Becky Oliver, WorldCom. So,

9   that sounded like a, yes; that when some urgent issue

10   existed, and a more timely response was required,

11   that's when the P-CLEC initiated additional follow-up

12   with the ISC?

13   MR. MAY: Yes.

14   MS. OLIVER: Thank you.

15   MR. MAY: Question 4: For what

16   instances/reasons would the ISC refer the P-CLEC to the

17   Qwest Service Manager? The ISC would refer the CLECs

18   to the service manager for situations that the ISC

19   could not resolve. The situations were case by case.

20   The P-CLEC was instructed to contact the account

21   manager or service manager, as the case may be, 14

22   times. The types of issues and number of occurrences

23   are three for USOC issues, two were AN/SPN issues, one

24   was SPN. One was a SOC issue. Six were business

25   rules/process-related. And two were DLRQ circuits not

1   in TIRKS.

2   Question 5: Did HP evaluate the level of

3   consistency of knowledge or ability to provide

4   assistance between the multitude of ISC Help Desk

5   representatives that the P-CLEC contacted? The answer

6   is, no.

7   MS. OLIVER: Becky Oliver, WorldCom.

8   Follow-up back on Question 4. And I didn't know note

9   the number, but you gave a number of instances where --

10   MR. MAY: 14 in total and then broke them

11   out by type.

12   MS. OLIVER: Yeah. Some of those, where

13   the P-CLEC was referred to the Qwest service manager,

14   was related to business rules or process issues.

15   MR. MAY: Six.

16   MS. OLIVER: Okay. How does that then

17   relate back to the response to Question 1; that the

18   call 1center responsibility includes providing

19   clarification on business rules? Was this something

20   beyond that scope?

21   MR. MAY: Yeah. Given the fact that

22   WorldCom Question 1 has been deferred to KPMG, we

23   couldn't relate the answers to those two questions.

24   MS. OLIVER: Okay. I will ask it a

25   different way. Were those instances -- issues having

 1   to do with business rules or process issues were

 2   deferred to the Qwest service manager, were those

 3   issues related to clarification or questions about the

 4   business rules or something greater in scope than that?

 5   MR. MAY: The answer is that they were

 6   for clarification. And I believe, in all instances,

 7   they were for clarifications on rarely used product

 8   types or complex products.

 9   MS. OLIVER: Thank you.

10   MR. MAY: You are welcome. Thank you

11   all.

12   MR. DIXON: Good night.

13   MR. FINNEGAN: I got one follow-up. I

14   understand, in response to AT&T Question 3, HP is going

15   to clarify the use of the term, "extended waiting," in

16   the next version of the report, which will be the final

17   report. I am not sure I can live with that void in my

18   life for another three days.

19   MS. ANDERSON: Maybe you need to get a

20   life.

21   MR. MAY: Okay. John, hold onto your

22   seat. Here it comes: The sentence will be changed to

23   read, "It was the P-CLEC's experience that Qwest's ISC

24   promptly answered the P-CLEC's call, following the

25   selection of the appropriate menu option, before it was

1   able to speak to an ISC representative."

2   MR. WEEKS: All that to answer one

3   question.

4   MR. FINNEGAN: It was worth it.

5   MS. ANDERSON: Do you feel whole now?

6   MR. PETRY: Do you have "M" life?

7   MR. FINNEGAN: It sort of begs the

8   question, promptness. Is there some quantitative

9   aspect attached to the promptness?

10   MR. MAY: We did not apply a quantitative

11   measure.

12   MR. FINNEGAN: I am satiated.

13   MS. ANDERSON: Okay. So, I think, just

14   to clarify, we have a couple of questions that we will

15   come back to tomorrow.

16   (Discussion off the record.)

17   (Whereupon these proceedings were

18   concluded at 4:50 p.m. on May 15, 2002.)

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