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ROC OSS 271 VENDOR TECHNICAL CONFERENCE #3

Hotel Teatro

1100 Fourteenth Street

Denver Colorado

Thursday, May 16, 2002

8:30 a.m.

1 APPEARANCES :

2 AT&T

3 JOHN FINNEGAN
4 MARY TRIBBY
5 TIM CONNOLLY

6 HPC

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

20 KPMG

21 MIKE WEEKS
22 JOE DELLA TORRE
23 BEN HEMPHILL
24 CARRIE THIELEMANN
25 JOE GORALSKI
26 JOHN DEAHL
27 LIZ FUCCILLO
28 NOLAN DINSMORE
29 RUSS GUZDAR
30 ALAN SALZBERG
31 YLONDA CHESTNEY
32 TERRY TRUDGIAN
33 ANN LAWRENCE
34 BOB FALCONE
35 BRIAN RUTTER
36 CHRIS BLACK
37 FELICIA KENDRICK
38 FRED ARMSTRONG
39 GEORGE CORYELL
40 JASON CUMBERLAND
41 JULIANA BARTRA
42 MARCOS DaCRUZ
43 MICHAEL BUJAN
44 MICHELLE TULIEN
45 RICH WOODHOUSE
46 RYAN SHURTER
47 SAM YEUNG

1 APPEARANCES (CONTINUED):

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

6 MTG
7 DENISE ANDERSON
8 BOB CENTER
9 MARIE BAKUNAS

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

33 WORLDCOM
34 BECKY OLIVER
35 TOM DIXON

36 NEW MEXICO
37 MIKE RIPPENGER

38 OREGON
39 IRV EMMONS

40 WASHINGTON
41 DAVE GRIFFITH
42 TOM SPINKS

1 APPEARANCES (CONTINUED):

2 NEBRASKA

BUSTER GRIFFING

3 DICK PALAZZOLO

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1 PROCEEDINGS

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3 MS. ANDERSON: Mary is calling in to
4 the bridge and letting people know that if they
5 need to let us know anything or have questions,
6 although we haven't had many questions from the
7 bridge even when we could hear them, that they
8 can call her phone.

9 Also speaking of cell phones, if
10 folks could turn their cell phones off today
11 and pagers, as well, that would be helpful. We
12 had quite a little medley going on yesterday.

13 Well, I think we are going to pick
14 up where we left off yesterday. Is there
15 anything else before we get started.

16 We will have a break this morning,
17 lunch, then we will be breaking at 3.

18 MR. DELLA TORRE: Good morning,
19 folks. We will start with the two questions
20 from AT&T for Test 24.8.

21 Question number 1 is a request for
22 clarification around the term "Tier 0" support.

23 First, the statements in the report
24 only apply to the ISC and not the wholesale
25 systems help desk for Test 24.8 as the ISC was

1 the subject of that test.

2 In terms of the Tier 0, Tier 1
3 distinctions, Tier 0 is the first level of
4 Qwest's ISC issue resolution process. The
5 Tier 0 issues are handled in Sierra Vista,
6 Arizona and if the particular issue being
7 called in is not resolved in Sierra Vista, it's
8 typically escalated to the next tier, which is
9 Tier 1.

10 The Tier 1 issues are handled in
11 Denver and Minneapolis or Cheyenne.

12 MR. CONNOLLY: Tim Connolly, AT&T.

13 We are trying to get a clarification
14 on what is in Test 24.7. It seems that the
15 first tier of support there, entry point, is
16 identified as Tier 1.

17 MR. WEEKS: That's correct. ISC is
18 Tier 0.

19 MR. CONNOLLY: Is there any
20 difference between --

21 MR. DELLA TORRE: It's initial
22 support in both cases. Different label.

23 MR. WEEKS: It's initial line of
24 defense.

25 MR. CONNOLLY: These are Qwest's

1 terms.

2 MR. DELLA TORRE: Correct.

3 MR. CONNOLLY: And not -- thanks.

4 MR. DELLA TORRE: Question 2: What
5 procedures are utilized in the ISC to determine
6 the si variety level to assign to a
7 CLEC-reported problem.

8 By what means can see variety levels
9 be changed on previously-reported problems?

10 This is similar to a question we did
11 address yesterday but for the ISC. The
12 response time or severity level is assigned to
13 an issue based on the reason for the inquiry.
14 Each reason falls under a specific severity
15 code.

16 The reasons and severity codes are
17 documented on Qwest's wholesale web site.

18 As for changing severity levels,
19 they can be adjusted on a case-by-case basis.
20 And this is typically in conjunction with the
21 escalation process. However, those are two
22 separate and standalone processes.

23 MR. WEEKS: So it's similar in
24 operation to the -- it's similar in operation
25 to the way that the wholesale system help desk

1 operates with respect to severity and with
2 respect to escalation.

3 MR. CONNOLLY: Did KPMG get an
4 opportunity to look at the operation of the ISC
5 help desk for the type of situation where there
6 became problems with a certain type of LSR,
7 certain product, or certain activity type, that
8 was being reported in by several CLECs? Would
9 that sort of occurrence, of a common problem
10 being voiced by many, be reacted to differently
11 than you know, a problem that just seems to
12 have a single source?

13 MR. WEEKS: I think the answer is
14 yes, but we will have to talk for confirmation
15 with our people that did that work. I vaguely
16 recall a conversation along those lines with
17 the folks during our hearing preparation
18 things, that if there is a pattern here that is
19 developing, that is evolving, looks like we
20 need a patch or change or something, where we
21 are beginning to see a pattern across multiple
22 calls, that there is a little SWAT team
23 organized or mobilized to figure out what the
24 problem is and fix it. That is my recollection
25 subject to check.

1 MR. CONNOLLY: Thank you.

2 Appreciate your getting back.

3 MR. DELLA TORRE: I will turn it
4 over to HPC for Test 10.

5 MR. MAY: Geoff May. Actually, we
6 have a couple follow-ups from yesterday. Does
7 anybody need copies of Test 10 questions? Jeff
8 Crockett has copies of Test 10 if anybody needs
9 them.

10 MR. PETRY: Good morning, this is
11 Don Petry, H-P. We would like to go through a
12 few clarifications.

13 First is to clarify the pre-order
14 order integration follow-up question AT&T
15 presented.

16 H-P's final report, addendum HP-B
17 contains release 7, pre-order and order
18 integration analysis, as well as the pre-order
19 and order -- pre-order to pre-order and
20 pre-order to order integration that the P-CLEC
21 actually performed in its systems.

22 That begins on page 38, section 5.

23 The H-P final report addendum HP-C
24 contains release 8.0 pre-order and order
25 integration analysis.

1 Because this was used with the
2 volume P-CLEC we did not do, you will not see a
3 similar section in that report, because we did
4 not do the system integration for the volume
5 P-CLEC.

6 Additionally, I just would like to
7 state that the information that you see
8 documented in the release 7.0 or H-P B,
9 Addendum H-P B, was also performed for IMA EDI
10 release 6.0 when the P-CLEC was first
11 established.

12 Second follow-up. Test 12 A,
13 WorldCom question 15. H-P previously answered
14 yes to this question. We would like to just
15 give a further clarification for the record.
16 LSRs are not used by Qwest for UDF pre-order
17 and order functions.

18 Additionally, H-P as the P-CLEC
19 received no error messages in the course of our
20 portion of the UDF testing.

21 Third, just general comment in
22 response to some follow-up questions that AT&T
23 had raised. H-P will be in our final release
24 of our reports making revisions to the business
25 process sections to explicitly identify the

1 activities or items that the P-CLEC did in
2 relationship to general business processes.

3 Also, follow-up for -- from VTC
4 number 2, it was an AT&T question 24 regarding
5 exception 2075 and contacts with the Qwest help
6 desk.

7 After March 8th, the P-CLEC had 56
8 additional instances of contacting the Qwest
9 help desk. And in all of those instances, H-P
10 was satisfied with the results.

11 And last but not least, was a
12 follow-on to a WorldCom question regarding --
13 asking whether or not the -- when we contacted
14 the help desk, whether or not we had to go to
15 escalation.

16 Going back through our records, over
17 50 percent of the time the contact to the Qwest
18 help desk was resolved with one contact, that
19 initial contact.

20 Any questions?

21 MR. CONNOLLY: Was the second
22 contact from (inaudible).

23 MR. PETRY: No, I think it was on
24 section 24.8.

25 MR. CONNOLLY: Don, Tim Connolly.

1 Is it true -- when you talk about
2 the Appendix B, H-P Appendix B, where you said
3 the work on 6.0 to do the integration was
4 performed. But it is not reported in that H-P
5 Appendix B; is that right.

6 MR. PETRY: Correct. The reports
7 that are appendix H-P B and C is a pre-order
8 order integration analysis performed on release
9 8.0 and 7.0.

10 At the time that was performed 6.0
11 had already sunset, so there was no -- we did
12 not do the pre-order order integration analysis
13 for 6.0. But our -- the P-CLECs' experience
14 was we did the same activity in terms of the
15 pre-order to pre-order, pre-order to order
16 integration in 6 as what we have documented
17 for 7.

18 MR. MAY: Okay. Geoff May with H-P.
19 We are going to proceed with Test 10, AT&T
20 question number 1: Please identify each of the
21 nine (9) Qwest-issued Addenda that were
22 published in response to Observations and
23 Exceptions released during the OSS test.

24 Qwest IMA EDI 7.0 disclosure addenda
25 3 through 9 were cited by Qwest in response to

1 observations and exceptions referenced in Table
2 10-1.26, test cross-references 10-1-2, 10-1-4
3 and 10-1-5.

4 Question 2: Please identify each of
5 the fourteen (14) Qwest-issued addenda that
6 were published in response to Observations and
7 Exceptions released during the OSS test.

8 Qwest IMA EDI 8.0 Addenda 1 through
9 14 were also cited by Qwest in response to
10 observations and exceptions referenced in the
11 same tables referenced in our response to
12 question 1, which are test cross-references
13 10-1-2, 4 and 5.

14 Additionally, since the draft final
15 report release, Qwest has issued IMA EDI 8.0
16 disclosure Addendum 15, IMA EDI 9.0 disclosure
17 Addenda 1 and 2 in response to, or they have
18 been cited in response to H-P observations and
19 exceptions.

20 Question number 3: What notice did
21 Qwest provide to the industry when it made the:
22 IMA EDI Corrective Procedures and Error Codes"
23 document available?

24 Please identify the IMA releases
25 that this document addresses for error codes

1 and jeopardy codes.

2 Qwest provided industry notification
3 via e-mail channels on October 2nd, 2001, and
4 March 12th, 2002, that identified the changes.

5 It is the P-CLEC's understanding
6 that this document applied to all current
7 releases.

8 Question 4.

9 MR. CONNOLLY: Excuse me, Geoff. Is
10 it correct to describe the corrected procedures
11 and error codes as being a cumulative document
12 that addresses the releases that are in effect
13 and, as new ones come up, or new error codes,
14 they are provided in the document?

15 MR. PETRY: Don Petry, H-P. No, the
16 documented corrected procedures and error codes
17 is a generic or high level error code document
18 that applies to all the current IMA EDI
19 implementations that are supported by Qwest at
20 that time.

21 The individual error codes are
22 contained in a release-specific error list that
23 is provided by the Qwest EDI implementation
24 team to CLECs that use EDI.

25 MR. CONNOLLY: Thanks.

1 MR. MAY: Question 4: In Table
2 10-1.6 HPC lists the release date for each of
3 the versions of the IMA implementation
4 guidelines.

5 What is the meaning of HPC term
6 release date?

7 In what form was each of these
8 guidelines noticed to the industry?

9 H-P uses the term release date to
10 reflect any of the following information:

11 The Qwest-specified version release
12 or modification date listed in a change log or
13 revision history of the document.

14 The date that appears on a header or
15 footer of a Qwest document.

16 The date a document was distributed
17 or published to a web site.

18 These were noticed through the Qwest
19 wholesale customer notification process.

20 This answer also applies to AT&T
21 questions 5, 6, 7, 8, 11, 13 and 16.

22 This brings us to AT&T question
23 number 9: In what ways are the IMA Release
24 Note References related to IMA Disclosure
25 Documents?

1 In what ways are the IMA Release
2 Note References related to IMA Disclosure
3 Document Addenda?

4 The Qwest IMA release notes are
5 applicable to the IMA GUI system only, and are
6 not related to the IMA EDI system, IMA EDI
7 disclosure documents or their addenda.

8 Question 10: Provide H-P's meaning
9 of the term "Customer" in this section.

10 H-P defines the customer in this
11 section as a CLEC.

12 Question 12: Please confirm that
13 there is no Qwest technical publication
14 reference that H-P reviewed that provides
15 product and service information for
16 line-splitting.

17 Line splitting is covered in the
18 shared loop tech pub number 77406.

19 (Reporter requests clarification.)

20 Question 14: In Table 10-1.6 H-P
21 identifies the resale Product Database.

22 What is the source data from which
23 the Resale Product Database is developed?

24 What information is redacted to
25 provide the Resale Product Database?

1 H-P has no insight into how the
2 resale product database is developed or
3 redacted and would defer to Qwest on this.

4 MS. NOTARIANNI: Yes. Lynn
5 Notarianni. We are going to need to defer
6 that. We didn't realize it, until Loretta Huff
7 comes. And she is supposed to be here this
8 morning.

9 MR. MAY: We can come back to that.

10 MS. NOTARIANNI: You bet.

11 MR. MAY: Question number 15. I am
12 sorry.

13 VOICE: Number 13?

14 MR. MAY: 13 actually was one of
15 those covered by --

16 MR. PETRY: The answer to number 4.

17 MR. CONNOLLY: The third part of
18 question 13 was not covered by your responses
19 to the other questions.

20 MR. PETRY: Don Petry, H-P.

21 Prior to that document becoming
22 available, the P-CLEC obtained instructions on
23 how to prepare -- I will just read the question
24 first: Prior to this document becoming
25 available, by what means did H-P, in its role

1 as a P-CLEC, obtain the instructions necessary
2 to request directory/DA listing information
3 associated with particular listed telephone
4 number?

5 The P-CLEC obtained this information
6 through a number of different avenues. One was
7 attending Qwest directory listing training
8 classes.

9 Two is the IMA GUI user guides that
10 cover directory listing requirements for
11 resale, and the facility-based directory
12 listing documentation which covers directory
13 listings for unbundled or facility-based, as
14 well as the disclosure documentation, the PCAT
15 and LSOG, other documents published by Qwest on
16 their web site.

17 MR. CONNOLLY: Tim Connolly.

18 Can you tell us, if you know, what
19 the reasons were for Qwest to separately
20 publish that user guide for directory listing
21 inquiry system?

22 MR. PETRY: We have -- no -- and I
23 would defer that question to Qwest.

24 MS. KING: This is Beth King with
25 Qwest.

1 The reason that is published
2 separately is it is a unique GUI interface. In
3 addition, it is a very complex, our directory
4 listing systems are complex, so it warrants its
5 own document.

6 MR. CONNOLLY: But it didn't require
7 a separate document until January of this year?

8 MS. KING: The GUI itself, I need to
9 check that. The GUI itself, I would have to
10 check when it became available, the actual DLIS
11 GUI, which is a unique interface. So I defer
12 that to finding out when that became available.

13 MR. CONNOLLY: Also, same questions
14 for the directory listing inquiry Qwest
15 preparation guide, which has a first release of
16 February of 2002. Can you tell us why that was
17 separately published and --

18 MS. KING: I think we can defer
19 that.

20 MR. CONNOLLY: Thank you very much.

21 MS. KING: We can research that.

22 MR. MAY: Question number 15: H-P
23 identifies the Universal Service Order Codes,
24 (USOCs), and field-identified (FID) Overview.
25 It states: The USOC/FID Finder tool contains

1 all USOCs/FIDs approved by Telcordia.

2 Please explain the authority of
3 Telcordia to approve/disapprove Qwest's product
4 and service USOCs/FIDs.

5 H-P would defer this question to
6 Qwest.

7 MS. LUBAMERSKY: Telcordia is the
8 administrator of the USOC and FIDs. By
9 agreeing to have Telcordia play that role the
10 participants agree to their administrative
11 rules. So USOCs and FIDs have to follow
12 certain protocol for all users.

13 Telcordia does not approve or
14 disprove, but by agreeing to administer and
15 keep track of them all, we agree for example,
16 if USOC XYZ is available in 30 states as purple
17 dial tone, we won't try to use it as call
18 waiting.

19 So it's not, again, it's an
20 oversight process, not a punitive process.

21 MR. CONNOLLY: The descriptions in
22 the various tables in H-P's Report 10, are
23 those descriptions -- your understanding about
24 what the various tool names and documents are,
25 as a product of your analysis and use of those?

1 MR. PETRY: Yes.

2 MR. MAY: Yes.

3 MR. CONNOLLY: Unlike yesterday when
4 we talked about paraphrasing what Qwest's
5 description or user guides and so forth -- what
6 the Qwest web site says, yesterday you talked
7 in terms of Test 12 paraphrasing the Qwest
8 remarks.

9 These are the products of H-P's
10 evaluation of how these various documents do
11 what they do to enable a CLEC to work with
12 them; is that correct?

13 MR. PETRY: Don Petry, H-P.

14 The tool names, the URLs obviously
15 are statement of fact as we know them from.

16 But the tool names and descriptions
17 are either exact from Qwest documentation or
18 maybe a paraphrase of Qwest documentation,
19 especially in the description process, what
20 either H-P through the P-CLEC's understanding
21 of what the product or tool did, as well as any
22 Qwest-published documentation regarding that.

23 MR. CONNOLLY: But if H-P as it used
24 these technical publications, tools and so
25 forth, documents, if you found that a document

1 didn't contain the information that Qwest said
2 it would in its description, what would have
3 been H-P's actions in that case?

4 MR. PETRY: If H-P -- take an
5 example. If there was a technical publication
6 for interconnection unbundled loop and you
7 opened it up and it was the repair instructions
8 for a 1965 Mercedes, we would have opened an
9 observation or exception on that, indicating
10 the document did not purport to be what it was.

11 MR. CONNOLLY: For example on the
12 resale product database, the description you
13 provide says the RPD, which stands for that
14 resale product database, is a compressed
15 archive of HTML files accessible through the
16 product database home page.

17 If you went to that database and
18 found that it was incomplete, what would you
19 have done? Would that have been something that
20 would rise to an observation?

21 MR. PETRY: We would have opened an
22 observation or exception on that. And I
23 believe there were some instances where
24 information, we were directed to the RPD,
25 information was not posted there, and Qwest in

1 response to the observation and exception did
2 update the RPD, as well as any other associated
3 documentation.

4 MR. CONNOLLY: So for something like
5 the PIC/LPIC verification tools, where that
6 says CLECs can submit and receive batch files
7 containing PIC and LPIC data, you wouldn't have
8 verified that it allows those things by your
9 providing batch files or receiving batch files,
10 would you?

11 MR. PETRY: In this case we did not
12 receive batch files for PIC and LPIC
13 documentation. We were describing and
14 documenting the on-line tools that are made
15 available. Depending upon the scope of the
16 test and test cases we may have used some of
17 the items in our verification.

18 MR. CONNOLLY: So you have a kind
19 of, excuse me, a mix of information that Qwest
20 suggests are in these documents and tools, and
21 in some cases you were able to verify that they
22 do have that information?

23 MR. PETRY: Out of the tools that
24 are listed in Table 10-1.16, the only tool that
25 the P-CLEC did not verify or use was the

1 PIC/LPIC, submitting and receiving of batch
2 files.

3 MR. CONNOLLY: So for all of the
4 other tools identified in that table, the
5 description is information that you provided
6 based on your evaluation of the content or the
7 practice of that tool.

8 MR. PETRY: It's based on our
9 understanding or use of the tools and/or the
10 Qwest -- Qwest's own description of that tool
11 or site.

12 If you go to some of the sites they
13 may have an overview or statement on them as to
14 what this specific web page or series of web
15 pages is going to address.

16 MR. CONNOLLY: Thank you.

17 MR. MAY: This brings us to question
18 17: Please explain the reasons H-P applied no
19 "timeliness of document availability"
20 evaluation measurements to any of the processes
21 or subprocesses.

22 Pursuant to the master test plan
23 Test 10 was an adequacy evaluation and not a
24 timeliness evaluation.

25 MR. CONNOLLY: So if the documents

1 weren't there when you needed it, that would
2 not be something you would report in Test 10?

3 MR. MAY: No.

4 MR. PETRY: Don Petry, H-P.

5 If the document was not available
6 when we needed to use it, we would have
7 identified that in an observation or exception.

8 The Test 10 report covers the
9 adequacy of the documentation, not the
10 timeliness of it.

11 MR. CONNOLLY: The third part of our
12 question on 16, the -- this is a question about
13 the form of notice to the industry on the LSRs
14 eligible for flow-through documents.

15 MR. PETRY: Correct.

16 MR. CONNOLLY: This is an e-mail
17 notification also?

18 MR. PETRY: That is correct, Tim,
19 it's an e-mail notification.

20 MR. CONNOLLY: Customer
21 notification?

22 MR. PETRY: Notifications are
23 provided through Qwest's wholesale customer
24 notification process.

25 And if you go to -- let me get you

1 the cross-reference -- Table 10-1.18 where it
2 defines or describes the versions and release
3 dates of those documents, you will also, can go
4 back through the customer wholesale
5 notification process and find a communicator
6 that came out either on that day or the day
7 following describing the publication of that
8 document.

9 MR. CONNOLLY: Thank you.

10 MR. MAY: That brings us to question
11 18: Please explain the Clarity standard and
12 the manner in which H-P applied it for purposes
13 of Test 10.

14 H-P evaluated for clarity with a
15 usability measure. If a person could
16 successfully understand the task or process for
17 which the document was written, the document
18 was judged to be clear.

19 Where the information prevented the
20 subject from understanding a task, the document
21 was determined to be unclear.

22 Incorrect information was addressed
23 and evaluated as part of the accuracy
24 evaluation criteria.

25 MR. CONNOLLY: So is the clarity

1 usability standard, is that an H-P formalized
2 evaluation criteria?

3 MR. MAY: Yes, it is.

4 MR. CONNOLLY: To what extent does
5 that standard rely on scientific training of
6 the person who is evaluating that particular
7 document?

8 For example, for EDI documentation,
9 what sorts of people, what training do those
10 people have for you to apply this clarity and
11 usability standard?

12 MR. PETRY: Don Petry, H-P. Taking
13 the example of the EDI documentation, the
14 documentation was used by individuals who were
15 experienced in the subject matter of EDI and
16 the X-12 standards.

17 So based upon, as we describe in our
18 evaluation criteria in terms of the "intended
19 audience," the documents have different
20 intended audiences. And many of the documents
21 actually identify who the intended audience is
22 for that document.

23 The expectation is that you would
24 not give an EDI document to the janitor and
25 expect them to understand it. And so we used

1 our (inaudible) -- I am sorry.

2 MR. CONNOLLY: Okay. I understand
3 that.

4 Now in terms of a document such as
5 the IMA user guide, what sort of background or
6 experience, training, would that sort of
7 person's qualifications be, for which you
8 applied the clarity usability standard?

9 MR. PETRY: The intended audience
10 for the IMA user's guide and clarification, you
11 are referring to the IMA GUI user's guide?

12 MR. CONNOLLY: Yes.

13 MR. PETRY: Thank you. The intended
14 audience for that is for service
15 representatives who would be entering
16 telecommunications orders for
17 telecommunications products. So individuals
18 who have a, some degree of background in that
19 area.

20 MR. CONNOLLY: So in your evaluation
21 team you would have service representatives,
22 for example, who are familiar with placing
23 orders and pre-order queries through a GUI,
24 they would look through the user guide
25 documentation and give you their assessment of

1 clarity usability?

2 MR. PETRY: Correct.

3 MR. CONNOLLY: I wouldn't be --
4 would it also be the types of people that you
5 have on your team who deal with the local
6 service ordering guidelines? Would they have
7 access to the user guide and give you an
8 opinion as to usability?

9 MR. PETRY: Correct.

10 MR. CONNOLLY: Thanks.

11 MR. MAY: Question number 19: H-P
12 listed the identical evaluation measures for
13 on-line tools and web-based training
14 applications as it did for all other forms of
15 documentation.

16 Please explain how the evaluation
17 measures were applied to these interactive
18 resources.

19 The information the P-CLEC used from
20 Qwest's web site was not true interactive or
21 web-based documentation and resources. It is
22 better described as electronic resources or
23 documentation. That is, Qwest uses its web
24 site as a warehouse for its electronic
25 documentation, but this documentation is

1 largely produced in Adobe PDF, Microsoft Office
2 documents, or web-based document formats.
3 Consequently, the evaluation measures applied
4 to traditional print-based documentation are
5 equally applicable here.

6 MR. CONNOLLY: How about in the
7 training realm, where we have got web-based
8 training applications and instructor-led course
9 material? Aren't those interactive?

10 MR. PETRY: Don Petry, H-P.

11 The web-based training, while it
12 is -- you may conduct the web-based training in
13 a seemingly interactive mode, it is a
14 predefined scripted document that is available
15 on the web site that, as the user goes through
16 the training, they are moving through a series
17 of predefined and preformatted screens and
18 pages.

19 So that is why we apply the same
20 measure here.

21 For instructor-led training, the
22 materials that are handed out or presented on
23 the screen are, again, a static type document.
24 It is the interaction or the dialogue with the
25 instructor that would be the only truly

1 interactive portion of that.

2 MR. CONNOLLY: So the web-based
3 training is not the same sort of static data,
4 PDF files and parts of the instructor-led
5 course materials are both somewhat interactive
6 and somewhat static, is that right?

7 MR. PETRY: Correct.

8 MR. CONNOLLY: Am I understanding
9 right?

10 MR. PETRY: Just clarification on
11 the web-based. The reason why we distinguish
12 between interactive, the responses and the
13 screens you get on the web based training is
14 not necessarily based upon you input a specific
15 piece of data and it's going to come back with
16 a variable type response.

17 It is a presentation of a static
18 type of document or training materials. It's a
19 matter of how you navigate through that, and
20 the on-line tool that manages the navigation
21 through that.

22 MS. OLIVER: I would like to clarify
23 that.

24 Becky Oliver, WorldCom.

25 Follow up on question 19. So the

1 application of the evaluation measures were the
2 same for the paper documentation and electronic
3 documentation, does that imply that H-P did not
4 include in their scope of this clarity or
5 usability evaluation how actually maneuvering
6 through the web site impacted the usability of
7 that document as far as that, if the
8 information was easily found, you know, you had
9 to jump right around, or was that part of the
10 scope?

11 MR. PETRY: Don Petry, H-P.

12 The training and -- the on-line
13 training that was conducted was documented in
14 H-P's interim report published March 30th --
15 31st, 2001. And our results, evaluation of the
16 training is documented there.

17 We additionally opened observations
18 or exceptions or raised issues and observations
19 and exceptions regarding the training as it
20 pertained to if there was a specific training
21 course or on-line document that was made
22 available or cited in Qwest's response to H-P
23 observations and exceptions.

24 MS. OLIVER: Maybe I am asking this
25 question, then, in the wrong place. But I was

1 actually trying to get an understanding of the
2 evaluation criteria of clarity, or usability as
3 it's been defined, for whether it was on-line
4 training or the release notes or the EDI
5 developer work sheet, you know, any of the
6 electronic versions of the documentation that
7 H-P evaluated, did their clarity evaluation
8 criteria include aspects of being able to
9 migrate efficiently and easily to that
10 documentation?

11 (Pause.)

12 MR. PETRY: Becky -- Don Petry, H-P.
13 We will go back and take a look at our interim
14 report results again, but, when we evaluated
15 the training, we evaluated the training for
16 content and clarity, not necessarily for
17 navigation. And if we found issues regarding,
18 say, navigation or difficulty in getting to a
19 specific course or getting through a course, it
20 would have been cited there or, as I mentioned
21 earlier, in observations or exceptions where
22 Qwest would have cited this training as part of
23 their response and we reviewed it in resolution
24 of those observations and exceptions.

25 MS. OLIVER: Okay, thanks.

1 MR. MAY: Okay. I believe we are on
2 question 20. H-P reports the logs,
3 documentation and question, were a catalyst for
4 Qwest internal change requests, ICRs or CRs
5 that resulted in changes to current or future
6 releases of IMA EDI disclosure documentation or
7 related Qwest documents.

8 Please confirm that the P-CLEC was
9 not required to develop change requests and
10 submit these to Qwest to effect changes to
11 current or future releases.

12 This is correct.

13 Now --

14 MR. CONNOLLY: So as you were
15 working through this, you would identify the
16 problems, concerns that you were having, log
17 those in, share those with Qwest. Qwest would
18 peel off the ones that needed to go into the
19 systems development area, write their CRs and
20 off they go?

21 MR. MAY: Correct.

22 Question 21: Please explain the
23 inconsistency between the number of Pre-Order
24 functions implemented (13) and those H-P claims
25 it implemented in its Test 12 report (12) and

1 that KPMG Consulting claims in its Test 12
2 Report (14).

3 14 is the correct number. We will
4 update our report. There was some discussion
5 of this yesterday. And it has to do with
6 whether you disaggregate one or two functions,
7 so we will clear that up.

8 MR. CONNOLLY: Thank you.

9 In that particular paragraph is that
10 discussion regarding IMA 8? And by that
11 paragraph I mean the one, two, three, fourth
12 paragraph in test cross-reference 10-1-2.

13 MR. PETRY: It would be reference to
14 IMA releases 6, 7 and 8.

15 MR. MAY: Question number 22:
16 Please explain the basis for the H-P statement:
17 "In IMA releases 5.0 through 9.0 Qwest
18 implemented numerous changes to improve the
19 format, content, clarity, and completeness of
20 the IMA EDI disclosure documentation as it
21 pertains to H-P's understanding of the changes
22 in IMA release 9.0.

23 H-P will revise its final report to
24 reference IMA releases 5 through 8 in this
25 context.

1 H-P reviewed the Qwest IMA EDI
2 disclosure documentation for release 9.0 only
3 to verify Qwest's resolution of open items from
4 the P-CLEC's EDI question and documentation
5 logs and H-P observations and exceptions.

6 MR. CONNOLLY: When you look at the
7 changes that were being implemented, did it say
8 that those were being implemented to improve
9 the format, content, clarity and completeness?

10 MR. PETRY: Don Petry, H-P.

11 No.

12 MR. MAY: Question 23: Please
13 explain the ways in which the evaluation
14 criteria for this evaluation were applied, in
15 light of the H-P comment that indicates that
16 IMA disclosure documentation is not easily
17 understood.

18 H-P notes that AT&T is correct when
19 it suggests that the language is not the same
20 as that used for other satisfactory evaluations
21 of the documentation.

22 However, H-P maintains that
23 documents -- that the documents in question are
24 easily understood and that the intent of the
25 language states this sentiment.

1 H-P will modify its final report
2 accordingly.

3 MR. CONNOLLY: Let's -- Tim
4 Connolly, again -- talk about this evaluation
5 criteria, because there is a number of these
6 that we pointed out that H-P in certain cases
7 said that, in your comments, that your
8 evaluation was that they, the document was
9 easily understood, and easily understood was
10 your standard.

11 So in certain cases it appears that
12 you met the documentation -- the documentation
13 met your standard, in other cases it didn't
14 meet your standard.

15 So, can you help us understand what
16 your standard is for this "easily understood"
17 criterion?

18 MR. MAY: We would have issued not
19 satisfied if something didn't meet our
20 standard. So we are acknowledging that the
21 semantics need to be adjusted to reflect that,
22 in all cases, the test objects met the
23 evaluation criteria.

24 MR. CONNOLLY: Well, maybe -- why
25 don't you explain what this criteria is. Then

1 we can perhaps, then I can perhaps answer my
2 own questions.

3 MR. PETRY: The easily understood
4 criteria is that the target audience for the
5 documentation could take the documents, read or
6 review them and understand the content or
7 functions that were being described in the
8 documents for use.

9 I think it's a matter of, as we have
10 stated previously, there is just some
11 inconsistency in the language that we use.
12 Specifically here to test cross-reference
13 10-1-3, the criteria says, "Can be easily
14 understood by the intended audience."

15 Our comment says that the P-CLEC was
16 able to use and understand these documents.

17 We will clarify and make the
18 language consistent. In all of these cases
19 this question, as well as the additional AT&T
20 questions, H-P felt that the criteria were met.

21 MR. CONNOLLY: I don't understand
22 why -- what you mean by easily understood in
23 your criteria.

24 MR. PETRY: The individual, the
25 targeted audience for a document could pick up

1 the document, read through, understand the
2 steps or the topics that were being covered
3 there, and be able to then act based upon that
4 information.

5 Again, that criteria covered from
6 technical publications to product information.
7 It was applied to all of the documentation
8 cited in our Test 10 report.

9 MR. CONNOLLY: Well, if the IMA
10 disclosure documentation for a particular
11 targeted audience, which I believe we have
12 talked about is people who are going to program
13 EDI systems, work with the GUIs in developing
14 methods and procedures for service reps and
15 that sort of technical staff, if they were
16 otherwise competent and they found these things
17 hard to understand, what would have been your
18 result?

19 MR. PETRY: We would have issued
20 observations or exceptions or, as also cited,
21 we, through our question and documentation
22 logs, would have noted those issues, raised
23 those issues back through the process, to the
24 Qwest EDI implementation team.

25 And we did cite where there were

1 instances where the documentation -- there were
2 revisions to the documentation in response to
3 observations or were cited by Qwest in
4 responses to observations and exceptions.

5 MR. CONNOLLY: Is there a bright
6 line between easily understood and hard to
7 understand?

8 MR. PETRY: Clarification, please?

9 MR. CONNOLLY: Is there a number of
10 question log entries that would cause you to
11 say, there are too many of these problems, so
12 this is hard to understand. And there is
13 another number that is less than that that
14 would make them easy to understand. I am just
15 trying to grasp what this criteria means.

16 MS. ANDERSON: This is Denise.
17 Perhaps I could just interrupt here.

18 It sounds like maybe H-P would like
19 to take away this -- we have been talking on
20 the same issue here for quite a while. And
21 perhaps give it a little thought out of the
22 limelight, come back and say whether the light
23 is bright, whether it's dark, whether it's
24 clear, whether it's muddy, come back with
25 something. Would that work?

1 Is that agreeable, Tim?

2 MR. CONNOLLY: Sure. But I'd like
3 to point out that after we had submitted our
4 questions and got some e-mails back from H-P
5 saying they didn't quite understand what our
6 question was. The question was how is it that
7 there is evaluation criteria applied in one
8 case, it's easily understood and the response
9 is it's easily understood and that is a pass.

10 Another one, it's the same criteria,
11 easily understood. And the result is not
12 easily understood.

13 MR. MAY: And that is what we are
14 going to correct.

15 MR. CONNOLLY: Your comment is not
16 that it's easily understood and the result was
17 satisfied. We tried to get some understanding
18 of this.

19 MS. ANDERSON: I think perhaps they
20 missed it on their first pass with all the
21 paperwork and stuff getting ready for this.
22 I'd like to suggest they go away, I think they
23 have the essence of your question now, your
24 many questions.

25 Do you, Geoff and Don, think you

1 understand his question and you can go away,
2 figure out what you are going to correct or
3 modify or explain and come back --

4 MR. PETRY: Yes, Denise.

5 MS. ANDERSON: -- or we can have a
6 conference call or have it on the next TAG
7 call.

8 MR. PETRY: Yes, we do understand.

9 I want one question. In going back,
10 we did go back to AT&T for clarification. Just
11 to Tim's comment, we did not state anywhere in
12 the report that it was not the easily
13 understood.

14 It was AT&T's, as Tim responded
15 back, the inconsistency of the language. But
16 we did not state anywhere in here in one
17 instance that we gave them a satisfied, but
18 then said that it was not easily understood.

19 So I just want that for the record.

20 MS. ANDERSON: You disagree with
21 that?

22 MR. CONNOLLY: I do. I do.

23 MS. ANDERSON: Do you have your
24 citation?

25 MR. CONNOLLY: Yes, I do.

1 MS. ANDERSON: Just to be clear that
2 they address that, in case there is some -- and
3 then I think, once we get that citation, we can
4 maybe move along, although this is a very
5 important area. It's just that we have some
6 others to cover and we have a very important
7 function tonight.

8 MR. MAY: The other thing is
9 actually this response applies to several other
10 questions, so --

11 MS. ANDERSON: Yes. I understand.

12 MR. MAY: That will help us move
13 along once we get through this.

14 MS. ANDERSON: I don't want to rush
15 past anything important, don't get me wrong.
16 But we have to divide up our time.

17 MR. MAY: Tim, you have a reference?

18 MR. CONNOLLY: I am going to read,
19 for the benefit of the other folks, citations
20 that I had sent to H-P in response to your
21 question.

22 For example, 10-1-9, evaluation
23 criteria is the EDI implementation guidelines
24 may be easily understood.

25 H-P's comment: The P-CLEC found it

1 to be readily used and understood. It says
2 nothing about easily understood.

3 MR. MAY: That is what we are going
4 to correct.

5 MR. CONNOLLY: But what we are
6 trying to understand, the application of your
7 criteria and the result. If upon our question
8 your reaction is to go and change your
9 comment --

10 MR. MAY: No, the intent of the
11 language that is there in the comment section
12 was to indicate that it was easily understood.
13 It's not that we are changing our evaluation,
14 it's that we are clarifying our report.

15 MR. CONNOLLY: And we say in
16 contrast, for example, 10-2-3, IMA user guide
17 can be easily understood.

18 H-P's comment, the P-CLEC could
19 easily understand the information in the guide.

20 We have no dispute with that. But
21 we see that remark and we contrast it with
22 10-1-9 and they are different. We are trying
23 to understand what the standard was, how you
24 applied it and what makes two different
25 results, two different comments achieve the

1 same result. That is what we are trying to
2 understand.

3 MS. ANDERSON: Thank you, Tim.

4 You guys got that, right.

5 MR. MAY: Yes. Take it back.

6 MS. ANDERSON: They are going to go
7 away and figure out what is misworded or what
8 their original intent was and get back to us.
9 Thank you.

10 MS. ANDERSON: Our response here
11 also applies to AT&T questions 27, 28, 29, 32
12 and 33.

13 Which brings us to question 24: It
14 is H-P's position that each of the observations
15 and exceptions identified in its comments
16 identify that H-P found inconsistencies between
17 the IMA disclosure documentation and other
18 references necessary to place pre-order and
19 order transactions?

20 The question is, is it H-P's --

21 No. This is only one scenario.

22 Question 25: Please confirm the
23 P-CLEC was not required to develop change
24 requests and submit these to effect changes to
25 related documents.

1 Confirmed.

2 Question 26: The last sentence in
3 the H-P comment appears to be a fragment.

4 H-P will correct that typographical
5 error in its final report release.

6 This brings us to question 30:

7 H-P will -- question 30, last
8 sentence: The last sentence in the H-P comment
9 contains typographical errors.

10 H-P will correct the typographical
11 errors in its final report release.

12 Question 31: Please provide the
13 standard applied by H-P to determine
14 completeness of the technical publications.

15 H-P looked for omissions or
16 inconsistencies in the documents and identified
17 those gaps as appropriate.

18 H-P also compared the technical
19 publications to other Qwest documentation and
20 to industry standard information, which brings
21 us to WorldCom question 1:

22 Describe any observations H-P made
23 of a process whereby documentation provided on
24 Qwest's wholesale website was updated as a
25 result of e-mail wholesale notifications which

1 provided additional information, clarification
2 or changes to information provided on the
3 wholesale website.

4 The P-CLEC regularly observed Qwest
5 publishing information via Qwest wholesale
6 customer notifications.

7 The information was simultaneously
8 or subsequently posted on the Qwest wholesale
9 website.

10 Question 2: Does the --

11 MS. OLIVER: Excuse me. Becky
12 Oliver, WorldCom.

13 The latter half of your response,
14 H-P observed that as well?

15 MR. MAY: Yes.

16 MS. OLIVER: Okay, thanks.

17 MR. MAY: Question 2: Does the EDI
18 disclosure documentation identify instances
19 where Qwest differentiates from the industry
20 guidelines for EDI mapping, (TCIF), and
21 business rules, (LSOG)?

22 The answer is yes.

23 Question 3. Identify which Qwest
24 GUI systems are included in the IMA release
25 notes document.

1 It is Qwest IMA GUI system. Or
2 Qwest IMA. The emphasis should be on IMA.

3 Question number 4: How much of the
4 PCAT website information is also available in
5 other business process/rule documentation.

6 H-P did not determine how much
7 duplication is present.

8 Question number 5: Does an updated
9 version of the LSRs eligible for flow-through
10 become available before, at the same time, or
11 after implementation of actual flow-through
12 changes that are made?

13 H-P defers this question to Qwest or
14 KPMG. It's possible we may have covered this
15 at some point yesterday.

16 MS. LUBAMERSKY: I believe Chris
17 Viveros is on the bridge and would be in a
18 position to answer that.

19 Chris, can you hear us?

20 MR. VIVEROS: Yes I can hear you
21 off a nd on.

22 MS. LUBAMERSKY: This is question 5,
23 WorldCom , about "LSRs ELigible for
24 Flow-Through" become available.

25 MR. VIVEROS: The intent is to cover

1 that documentation in advance of the IMA review
2 that is causing the change. There have been
3 times when the document was not published until
4 following the release. For the most part those
5 involved -- documents reflect exceptions or
6 exclusions that --

7 MS. ANDERSON: Chris, this is
8 Denise.

9 (Pause.)

10 MS. ANDERSON: We are good to go.
11 We have got Bob holding a microphone up to the
12 speaker. Start over again, please, Chris.
13 Sorry about this.

14 (Discussion to improve sound
15 quality.)

16 MR. VIVEROS: No problem. In answer
17 to WorldCom 10-35, the intent is to publish the
18 LSR eligible for flow-through document before
19 an IMA release where in fact the IMA release
20 is driving changes. There have been cases
21 where the document was not published in
22 advance.

23 There have been occasions when the
24 document was not published in advance. To
25 ensure that that doesn't happen again, we are

1 actually making a change, we will continue to
2 use the change management process to notify
3 CLECs of changes to the document, but the
4 document is actually going to be incorporated
5 into the product catalog on order and will flow
6 into the process of making all the necessary
7 PCAT changes associated with the release. So
8 that on a going-forward basis, the document
9 will always be published in advance of an IMA
10 release.

11 MR. MAY: Okay. Thank you, Chris.

12 WorldCom question 6: Did H-P
13 evaluate the ease in which updates to the EDI
14 disclosure documentation, as provided in
15 addendums, could be identified and understood
16 by CLECs that are in the process of developing
17 an EDI interface?

18 The P-CLEC reviewed and used the IMA
19 EDI disclosure addendum documents for IMA EDI
20 release 6, 7 and 8.0. The P-CLEC found it
21 could understand and implement the changes
22 documented in the addenda.

23 MS. OLIVER: Becky Oliver, WorldCom.
24 Follow up on that.

25 Just to make sure that my -- the

1 question is clear, that your response applies
2 to -- per the P-CLEC's experience, that when
3 these updates came out and you were in the
4 process of developing, you know, an EDI
5 interface, you are in the midst of development
6 and an update comes out, your answer applies to
7 that situation?

8 MR. MAY: Yes.

9 MS. OLIVER: Thank you.

10 MR. MAY: Question 7: Clarify with
11 the EDI implementation guidelines document
12 identifies the TCIF/ANSI version and release
13 numbers that Qwest's IMA EDI pre-order and
14 order interfaces use.

15 The answer is yes.

16 Question 8: Did H-P --

17 MS. ANDERSON: Geoff, just let me
18 check here.

19 Is anyone on the bridge?

20 VOICE: I am.

21 MS. ANDERSON: Hi, Peggy. Can you
22 hear okay?

23 VOICE: No. When you made the
24 adjustment for Chris, it changed everything.

25 MR. MAY: But can you hear me well

1 enough?

2 VOICE: No.

3 (Pause.)

4 MR. MAY: Question 8: Did H-P find
5 that the IMA user guide identifies system
6 requirements and dependencies for effectively
7 using the IMA GUI?

8 The answer is yes.

9 MS. OLIVER: Becky Oliver, WorldCom.
10 I'd like to go back to question 6, if I may for
11 additional follow-up.

12 MR. MAY: Okay.

13 MS. OLIVER: Can H-P provide any
14 more information about the P-CLECs' experience,
15 because I mean I would just think it would be
16 fair that, given the circumstance of you are in
17 the midst of development and updated
18 documentation comes out, how did the P-CLEC
19 deal with that and why specifically did you
20 find no problems with that?

21 MR. MAY: There is absolute -- there
22 is a massive record on our certification
23 efforts. All of our question and documentation
24 logs have been made public. All of our
25 meetings with the EDI implementation team were

1 published and noticed to the TAG. There is a
2 lot of detail.

3 The interim report I think, it
4 covers all of our experiences with 5 and 6 in
5 great detail. That of course, the interim
6 report was intended to describe the building of
7 the pseudo-CLEC, so that would cover the
8 interface development in great detail.

9 However, our implementation of 7.0
10 and 8.0 also went through the regular EDI
11 implementation team, project plans, weekly
12 meetings, question and documentation logs and
13 they are covered in 12 B of the, of our final
14 report.

15 Question 9, I believe: What
16 evidence or data did H-P use to determine the
17 completeness of the IMA release notes.

18 When the P-CLEC used the release
19 notes in conjunction with other release
20 documents the P-CLEC could successfully use the
21 new release functionality that it was tasked
22 with using. Therefore the release documents as
23 a set were deemed complete.

24 Question 10:

25 MS. OLIVER: Excuse me. Becky

1 Oliver, WorldCom. Can you specify what other
2 documents you are referring to in that answer?

3 MR. PETRY: Don Petry, H-P.

4 Becky, the release notes come out
5 prior to the actual release being implemented.
6 When the actual release comes out, the users
7 guide that is associated with that release is
8 also made available.

9 The release notes kind of highlight
10 the changes that are going to be implemented in
11 the upcoming release. The user guides that are
12 published with the release describe the full
13 functionality of the system.

14 So we viewed the release notes as an
15 advance of what is coming that we would be able
16 to use or changes in functionality.

17 And then when a release was
18 implemented, we used the then-current version
19 of the system in conjunction with the user
20 guides and were able to utilize the IMA GUI
21 system.

22 MS. OLIVER: Okay.

23 MR. MAY: Question 10: In
24 determining the accuracy of the IMA release
25 notes, did H-P perform a comparison evaluation

1 to other IMA release documentation.

2 The answer is yes.

3 Question 11: Did H-P's assessment
4 of the ease with which the PCAT website
5 information is understood include the ability
6 to maneuver through the website and find
7 specific information?

8 The answer is no.

9 Question 12. For what purposes did
10 the P-CLEC need to regularly reference the
11 P-CLEC website?

12 The PCAT was used for product
13 descriptions, valid forms, activity types,
14 valid types of service, valid req types,
15 product training information, implementation
16 information, provisioning information, business
17 procedures, resale information, optional
18 features and USOCs and FIDs.

19 Question 13. When would
20 flow-through changes resulting in an update to
21 the LSRs eligible for the flow-through document
22 occur outside of an IMA release.

23 I think we have covered this in the
24 AT&T question.

25 MS. OLIVER: Becky Oliver, WorldCom.

1 I guess I missed that. Can you provide a
2 response?

3 MR. MAY: That was the response
4 Chris gave, I believe.

5 MR. VIVEROS: Yes.

6 MS. OLIVER: This, the response I
7 received previously from Chris was about when
8 an updated flow-through document would be
9 available.

10 Here this is asking when would flow
11 through changes occur outside of a scheduled
12 IMA release.

13 MR. MAY: We would defer this
14 question to Qwest.

15 MR. VIVEROS: This is -- I think we
16 talked about this a little bit yesterday in
17 relationship to an AT&T question.

18 Changes would occur outside of a
19 normal scheduled release when, in fact, some
20 type of a problem associated with flow-through
21 was detected, either internally by us through a
22 call from a CLEC questioning why answers
23 weren't coming back in 20 minutes as expected
24 or in the case of the test through the
25 observation and exception process.

1 Our flow-through changes are
2 generally associated with IMA releases. So
3 outside of an IMA release it would be to
4 correct something.

5 And in turn, we may have to update
6 the document along with that change.

7 MS. OLIVER: Thank you.

8 I'd like to go back just a couple to
9 ask a follow-up on question 11.

10 H-P's response indicated that no
11 assessment was done of the ease with which the
12 P-CLEC could maneuver through the PCAT website
13 to find information being sought after.

14 I was just wondering if there was a
15 reason why that was the case, because I would
16 expect that the ease of finding this multitude
17 of information that you listed in the response
18 to question 12, that that would play a direct,
19 or be a direct contributor to the usability of
20 that information.

21 MR. PETRY: Don Petry, H-P.

22 Organizations have a variety of
23 different approaches that they can use to
24 publish or structure information they are
25 making available.

1 This -- H-P would say, we don't
2 know. However, it had been the P-CLEC's
3 experience that updates were made in response
4 to our observations and exceptions. We would
5 defer that to Qwest.

6 MR. VIVEROS: It's much like the
7 LSOG documentation which communicates Qwest
8 business rules not just for IMA but for all LSR
9 ordering.

10 So to the extent that a business
11 rule change is made or there is need for a
12 correction, the LSOG documentation would be
13 updated, not in conjunction with an IMA
14 release.

15 MS. OLIVER: Becky Oliver. Just to
16 follow up on that.

17 So, if I am understanding correctly,
18 any time a -- an error in the LSOG
19 documentation would be discovered, it would be
20 corrected and a new version released?

21 MR. VIVEROS: I don't think you
22 would be completely correct to say "any time."
23 I think it would depend on the error. If there
24 were minor errors in the document,
25 typographical errors or pagination issues or

1 something that was easily communicated through
2 a notice to the CLEC, the potential exists that
3 those types of changes would be aggregated and
4 incorporated into the next version associated
5 with the IMA release.

6 MS. OLIVER: Thank you.

7 MR. MAY: Just to address the state
8 of Washington's standing question. There were
9 no state-specific results and all of H-P's
10 observations and exceptions were closed
11 resolved.

12 That would bring us to the
13 conclusion of the Test 10 questions. And I
14 will pass the mic.

15 MT. MAY: Okay. Let's roll.

16 MS. LUBAMERSKY: I believe there was
17 one we deferred, and our expert is here.

18 MS. HUFF: This is Loretta Huff from
19 Qwest.

20 On question 14 from AT&T there was a
21 question about the resale product database and
22 the source data from which that is developed.

23 And the RPD is developed from retail
24 MMPs associated with products that are
25 available for resale. And the information that

1 is redacted from the RPD is only information
2 that is considered not necessary for the CLEC
3 to have to be able to place a successful LSR.

4 So it's only internal Qwest system
5 information that would be redacted. Any
6 information required by the CLEC is left in.

7 MR. DELLA TORRE: I think we are all
8 set. First, I'd like to share with everyone, I
9 saw on the cover of USA Today that employees
10 are starting to sue employers for stress.

11 (Laughter.)

12 MR. DELLA TORRE: In response to a
13 question from this morning, from AT&T as a
14 follow up to 24.8, you had asked a question
15 about common problems. And we did assess and
16 observe sort of the structural elements of the
17 process.

18 Qwest does do, they have a form
19 called Performing Trend Analysis that they go
20 through on a weekly basis. The coaches and
21 team leads will assemble information and are
22 looking specifically for common problems
23 encountered across different ISC reps. They
24 will go through this review in an attempt to
25 sort of detail what the problems were and issue

1 either MCC communicators to the reps internally
2 or potentially communicators out to the CLECs
3 to identify the particular common problems had
4 been noted.

5 But we did not see that in action.

6 MR. CONNOLLY: Thank you.

7 MR. WEEKS: Do you want to break?

8 MS. ANDERSON: Why don't we start
9 and go 15 minutes at least. Then we will
10 break.

11 (Pause.)

12 MR. CONNOLLY: Excuse me, 24.3?

13 MR. DELLA TORRE: 24.3 will be next.

14 Why don't we get going. We will
15 start with the Washington state questions.

16 MR. WEEKS: Shall we wait for Tom to
17 get back? Would you like us to wait?

18 VOICE: It's okay.

19 MR. WEEKS: In 24.3 the -- there is
20 only one unable to determine. One that is not
21 satisfied. It happens to be an unable to
22 determine.

23 This was a situation where there was
24 a Qwest process that was changed very late in
25 the game and we actually didn't have an

1 opportunity to make observations after the
2 process had changed. So we're really not able
3 to say whether or not, from our own experience
4 or from our ability to watch this process work,
5 whether it works or not.

6 We saw the process, we see that it's
7 well formed, all of that stuff from a design
8 perspective. We couldn't make any observations
9 of it in action. So we couldn't say it's
10 adhered to or followed. That is why the unable
11 is in there.

12 So there are no outstanding or open
13 observations and exceptions in this area at
14 this point. And there are not any
15 state-specific kinds of results for this
16 particular test.

17 MR. DELLA TORRE: We will start with
18 Montana. One question from Montana. Then we
19 will move to WorldCom, then AT&T.

20 So the Montana question: Please
21 identify in which exception(s) or
22 observation(s) KPMG formally raised the issues
23 of deficiencies in the Service Management
24 procedures for logging and tracking CLEC
25 correspondence and problems with tracking

1 Qwest's adherence to response time interval
2 guidelines for service managers.

3 That was in observation 3093.

4 WorldCom question 1: Do the Account
5 Teams support CLECs doing business with Qwest
6 for both LSR and ASR local requests?

7 The answer is yes.

8 Question 2: Please clarify the
9 Sales Team's role of initiating and completing
10 the sales cycle with the CLEC. Specifically:
11 Is the referenced "sales cycle", the cycle of a
12 sale between Qwest and the CLEC or between the
13 CLEC and its customer?

14 What products/services are
15 applicable to this "sales cycle"?

16 And that sales cycle is the cycle
17 between Qwest and the CLEC, not the CLEC and
18 its customer.

19 And all products and services that
20 are available for sale to any wholesale
21 customer are applicable.

22 Question 3. Please clarify the
23 Sales Team's role of generating sales
24 proposals. Are the sales proposals types of
25 agreements that fall outside the scope of

1 existing ICA tariff or as SGAT provisions?

2 The process of generating sales
3 proposals is for the sales team to address the
4 CLEC meetings for pricing and selecting the
5 various products that are available through
6 Qwest's wholesale operation.

7 However, we did not conduct any
8 examination of the sales proposals.

9 (Off record colloquy; laughter.)

10 MR. DELLA TORRE: Question number 4.

11 Please clarify if the service team's role of
12 serving as an escalation point for
13 pre-ordering, ordering, provisioning,
14 maintenance and repair includes both
15 OSS-related and order-related issue.

16 That's correct. The service team
17 can serve as an escalation point for both OSS
18 and order related issues.

19 Question 35. What on site
20 demonstration of Qwest's InfoBuddy system did
21 KPMG attend?

22 This was not a publicly noticed or
23 publicly -- made available to the public as a
24 demonstration. This was specifically created
25 and caused and executed for KPMG Consulting as

1 part of the test.

2 Question 6: What Qwest products and
3 services were the CLECs who provided KPMG
4 Consulting Account Management feedback using?

5 We are not aware of the entire list
6 of products and services that each of the CLECs
7 may have been using.

8 However, during the interviews, at
9 least the following were discussed. EELs,
10 unbundled network elements including loops and
11 UNE-P, resale, collocation, line splitting and
12 line sharing and trunks.

13 Question 7: Does Qwest assign
14 multiple CLECs to a single account team member?

15 And if so, how does an account team
16 member that has responsibility for multiple
17 CLECs prioritize his or her work load.

18 The answer is yes, Qwest does have
19 the opportunity or makes use of assigning
20 multiple CLECs to a single account team member.

21 That account team member is
22 responsible for prioritizing his or her work
23 load based on the severity and number of the
24 issues raised by the CLEC and/or escalations
25 they receive.

1 Question 8: Associated with KPMG
2 Consulting observations of the P-CLECs account
3 manager transferring issues to an alternate
4 service manager, did KPMG Consulting make
5 observations of the account service manager
6 informing the P-CLEC when its alternate service
7 manager should be contacted?

8 The answer is yes.

9 MS. OLIVER: Becky Oliver, WorldCom.
10 Follow-up.

11 Were those observations of this
12 occurring consistent with every instance of it
13 occurring?

14 In other words, were there times
15 when the alternate service manager should have
16 been contacted but when the notice wasn't
17 provided?

18 MR. DELLA TORRE: What we saw
19 specifically was the primary service manager
20 informing the P-CLEC of when the alternate
21 service manager should be contacted. And also
22 the primary service manager providing the
23 contact information for the alternate service
24 manager.

25 MR. WEEKS: In each case where we

1 observed that it should have happened, it did
2 happen. There may have been cases where it
3 should have happened where we weren't around,
4 we weren't making observations at that time and
5 it didn't happen. We couldn't comment on that.

6 But when we were observing it, in
7 each case where they should have, they did.

8 MS. OLIVER: Thank you.

9 MR. DELLA TORRE: Question 9: Was
10 an evaluation of the effectiveness of Qwest's
11 customer contact information tool conducted.

12 If so, what were the results?

13 The answer is no, we did not
14 evaluate the customer contact information tool
15 .

16 Question 10: Did KPMG Consulting
17 use any evidence other than the P-CLEC's
18 experience, such as Qwest's internal
19 documentation or issues database, to validate
20 Qwest's account teams' adherence to the
21 guidelines for issue closure?

22 The answer is yes. We reviewed the
23 entries made to the issues database and this
24 was -- this, in addition to the P-CLEC's
25 experience, give us the evidence to state that

1 Qwest is following the guidelines for issue
2 closure.

3 MS. OLIVER: Becky Oliver.
4 WorldCom.

5 The issues database review that you
6 conducted, did that include looking at issues
7 that were related to live CLECs?

8 MR. DELLA TORRE: Yes, it did.

9 MS. OLIVER: Thank you.

10 MR. DELLA TORRE: Question 11: Did
11 KPMG Consulting use any evidence other than the
12 P-CLEC's experience to validate Qwest's account
13 teams' adherence to guidelines for escalation
14 closure.

15 The answer is yes. It was the same
16 experience, that we observed entries being made
17 into the issues database for both the P-CLECs
18 and commercial CLECs.

19 Question 12: For what situations do
20 service managers facilitate direct
21 communication between a Qwest subject matter
22 expert and CLEC as opposed to interacting with
23 the CLEC separately on behalf of the CLEC.

24 And did KPMG observe any of these
25 situations?

1 We are not aware of any specific
2 rules of documentation that govern
3 communication between Qwest SMEs and CLECs.

4 However, we did observe examples
5 whereby Qwest's SME was in direct contact with
6 the P-CLEC and where the service manager
7 interacted with the SME on behalf of the
8 P-CLEC.

9 Question 13: Did KPMG Consulting
10 include in its evaluation of Qwest's ability to
11 provide updated documentation to CLECs the
12 distribution of documentation through means
13 other than the wholesale website?

14 The answer is yes. In addition to
15 distribution through the website, we noted
16 distribution directly through e-mail, as well
17 as other communications that were sent directly
18 by the account team.

19 And you can find additional
20 information on this in Test 23, the change
21 management process.

22 MR. OLIVER: Thank you.

23 MR. DELLA TORRE: AT&T. Question
24 number 1: Please explain the discrepancy
25 between KPMG's description of the composition

1 of the Service Team and that provided by H-P in
2 its Reports 12-A through 12-C.

3 Answer. We believe the discrepancy
4 is that HPC described the two service team
5 positions as executive director and vice
6 president, whereas our titles for the role the
7 are service director, senior service manager
8 and service manager.

9 And we believe that this discrepancy
10 was based on a change made to that organization
11 partway through the test and it was just a
12 matter of timing and titles of the roles.

13 Question 2: What were the number of
14 CLECs that were interviewed by KPMG for Test
15 24.3?

16 The answer is 3.

17 Question 3: Please describe the
18 CLEC input that was the cause of more in-depth
19 interviews.

20 And my response will cover both
21 question and question 4.

22 We believe that the concept of
23 in-depth may have been taken a little out of
24 context in that the report discusses in-depth
25 reviews, not interviews.

1 Our process is that we will go out
2 and conduct interviews with Qwest and
3 interviews with CLECs, observations on site.

4 We will then complete our analysis
5 or in-depth review of that information. If
6 subsequent activity is required, we will do
7 that.

8 In this particular case there was
9 nothing that came from the first round of
10 interviews from the CLECs that required us to
11 go back out and do a second round of
12 interviews.

13 MR. CONNOLLY: So, I guess -- I
14 notice that the part of your discussion about
15 the way you gathered the data from the various
16 resources, the only time that it mentions
17 specifically that facts caused you to go back
18 and look hard, more in-depth as you say, is the
19 paragraphs that deal with the CLEC --

20 MR. WEEKS: No, I don't think that
21 was intended to be that way.

22 It's anything we come across that
23 causes us to sort of raise our eyebrow or
24 question whether we understand something
25 properly or whether an issue has been raised,

1 either as a direct result of what we saw or
2 what someone represented to us they know about
3 or saw, we would dig in.

4 MR. CONNOLLY: So it's on the whole
5 body?

6 MR. WEEKS: On the whole body. That
7 is what we were trying to communicate. And
8 maybe we slightly misled you.

9 So, there are various sources of
10 information. We synthesize those sources of
11 information, we analyze all that information,
12 and we make decisions about what to follow up
13 on and what areas to dig deeper into based upon
14 that synthesized information.

15 MR. CONNOLLY: Thank you.

16 MR. DELLA TORRE: Question 5:
17 Please describe the relationship between the
18 account establishment and management
19 responsibilities defined in InfoBuddy and those
20 defined at the wholesale website.

21 The internal Qwest InfoBuddy
22 documentation essentially expands on the
23 account team responsibilities that are listed
24 on the Qwest wholesale website.

25 It provides more detail around the

1 operating methods and procedures and defines
2 specific functions of the account team in a
3 greater level of detail.

4 MR. CONNOLLY: Would it be correct
5 to say that the wholesale website is -- would
6 set the CLECs expectations about what account
7 establishment and management is and InfoBuddy
8 would be more of an internalized view of
9 what --

10 MR. WEEKS: That's correct.

11 MR. CONNOLLY: Or account
12 establisher would --

13 MR. WEEKS: Yes. I would say the
14 external is kind of a "what" and the internal
15 is kind of a "how".

16 MR. CONNOLLY: But within InfoBuddy
17 it's also very clear the expectations being set
18 are the same or have a relationship to those on
19 the wholesale website?

20 MR. WEEKS: I think the one
21 amplifies on the other. Had there been
22 inconsistencies between roles and
23 responsibilities and accountabilities and
24 deliverabilities and the like between the two,
25 we would have known that and raised it as an

1 issue .

2 MR. DELLA TORRE: For questions 6, 7
3 and 8 the following answers will apply.

4 Please describe the evaluations
5 conducted by KPMG in which it examined the
6 responsibilities assigned to the -- assigned to
7 manage the Qwest account establishment
8 function.

9 The difference between 7 and 8, the
10 Qwest account management furnishings and Qwest
11 service management function.

12 MR. CONNOLLY: Quite. 6 is account
13 establishment, 7 is account management and 8 is
14 service management.

15 MR. DELLA TORRE: In each of those
16 cases though our review consisted of a similar
17 approach. Furthermore, just for point of fact,
18 in section 2.4, the evaluation methods of the
19 report do identify the evaluation methods that
20 we employed.

21 We interviewed the Qwest personnel
22 involved in the account establishment function,
23 we examined the InfoBuddy system and relevant
24 documentation pertaining to that system.

25 We reviewed internal Qwest

1 documentation, including organizational charts,
2 job aids, process flows and MMPs.

3 We reviewed the publicly available
4 information from the Qwest wholesale website.

5 We interviewed and observed H-P
6 acting as the P-CLEC through their experience
7 and interactions with the Qwest account team.

8 It's slightly modified for 7 and 8
9 in that we did our interviews with Qwest
10 personnel that were specifically involved with
11 the account establishment function, but we
12 still -- InfoBuddy is the same. The internal
13 Qwest documentation is the same and the
14 publicly available information from the
15 wholesale website is also the same.

16 And finally, we completed our
17 interviews and observed H-P interacting with
18 their account team.

19 MR. CONNOLLY: Would it be your
20 opinion, or is this the case, that with your
21 analysis of the internal processes, procedures
22 and so forth, you have an idea about what
23 Qwest's management focus is for these
24 functions?

25 MR. DELLA TORRE: Elaborate a little

1 on management focus.

2 MR. CONNOLLY: What are the
3 day-to-day sort of expectations of problem
4 managing, problem resolution, interacting with
5 your CLECs, cycles for follow-up questions and
6 answers, all those various types of
7 managerial/supervisory issues.

8 MR. WEEKS: Let me clarify because I
9 heard a couple different aspects and I want to
10 make sure we're answering the question you are
11 asking.

12 Let's say there is an account
13 process that has to do with managing the
14 relationship of the CLEC. That is the ongoing
15 activities you described that are things like
16 following up on problems and so on.

17 Then we would describe that there is
18 a management control feedback loop that sits on
19 top of that that are what I would call
20 management responsibilities, where you are
21 looking down on that fundamental process and
22 you are trying to monitor whether that process
23 is working properly and it's meeting its
24 objectives and all that stuff.

25 Are you asking about the underlying

1 relationship management activities or are you
2 asking about this management control and
3 feedback that is kind of the sales management
4 role?

5 MR. CONNOLLY: I am looking more at
6 the higher level.

7 MR. WEEKS: Okay.

8 MR. CONNOLLY: Did you get a sense
9 or observe that there is that presence of that
10 managerial function looking across these
11 things.

12 MR. WEEKS: Okay.

13 MR. CONNOLLY: To say these --

14 MR. WEEKS: Account teams are doing
15 what they are supposed to be doing?

16 MR. CONNOLLY: Exactly.

17 MR. WEEKS: Okay, let me check.

18 (Pause.)

19 MR. WEEKS: The answer is yes, Tim,
20 we looked at both aspects. Both how does the
21 account team manage its relationship with the
22 CLEC and how do the managers that sit over the
23 top of those people manage their people doing
24 account management, account relationship
25 activities.

1 MR. CONNOLLY: Thank you. The same
2 with servicing manager?

3 MR. WEEKS: Yes, exactly.

4 MR. DELLA TORRE: Question 9:
5 Please confirm that CLECs can access
6 information about their own account team using
7 the customer contact information tool and no
8 other CLEC's account team.

9 The customer contact information
10 tool on the website is intended to provide the
11 CLEC with its own account team information and
12 its own account team information only.

13 However, given the -- another CLEC's
14 information you certainly could find out
15 someone else's. But I suppose that is true
16 with any security system. If you have
17 someone's user ID and password, you can access
18 someone else's account.

19 MR. CONNOLLY: I guess my question
20 arose from the third paragraph in 24.3-3 where
21 it says, in addition, CLECs are directed to
22 refer to Qwest's customer contact information
23 tool to identify the Qwest sales executive and
24 service manager assigned to each company.

25 MR. WEEKS: Implication being there

1 is a list of companies and contacts, you can
2 see everybody else's.

3 MR. CONNOLLY: That was the
4 implication. I wanted to make sure that wasn't
5 the case.

6 MR. DELLA TORRE: No. The
7 information is specific to the CLEC, because
8 you need to use your own company name and
9 acronym.

10 MR. CONNOLLY: Thanks.

11 MR. WEEKS: We were just pointing
12 out the obvious, that that information about a
13 company's name is reasonably public
14 information, one could get access to that
15 information if one wanted to.

16 MR. DELLA TORRE: But it's not
17 designed that way.

18 MR. WEEKS: But it's not designed to
19 do that.

20 MR. DELLA TORRE: Question 10:
21 Please identify the Qwest mail-out that was
22 used to inform the CLECs of the time frames by
23 which the CLECs can expect to receive a
24 response and a status update.

25 That was an April 4, 2002 mail-out

1 with a subject line of "Methods and Response
2 Times When Contacting Qwest Service Managers."

3 And the document number -- PROS.--
4 PROS.04.04.02.F.

5 There is more to that. Slash
6 00418.Service, underscore, managers.

7 MR. CONNOLLY: I am glad you were
8 very patient going through that so we know
9 exactly how to find it.

10 MR. DELLA TORRE: That's true.

11 Question 11: Please clarify what is
12 meant by the service manager role "Potentially
13 assign issues to an accountable Qwest SME."

14 This is fairly straightforward. If
15 a service manager is presented with an issue
16 from a CLEC that he or she is not able to
17 answer, that service manager will contact the
18 Qwest subject matter expert to assist in
19 answering and resolving the issue.

20 In some cases that escalation is not
21 required if the service manager can answer the
22 question.

23 MR. CONNOLLY: To assign as
24 necessary is the same as potentially assign?

25 MR. DELLA TORRE: Correct. Correct.

1 Question 12: KPMG Consulting
2 reports that it is unable to determine if
3 customer calls were returned per the documented
4 intervals.

5 Is KPMG able to make a determination
6 that a percentage of customer calls are not
7 returned at all?

8 The answer is no.

9 Qwest established the communication
10 response interval near the end of the test.
11 And we did not do any real monitoring or
12 evaluation of that.

13 Question --

14 MR. WEEKS: This is the item I
15 talked about earlier, the unresolved or unable.

16 MR. DELLA TORRE: Question 13. What
17 is the Qwest organization that manages the
18 document specialist function?

19 Document specialists are actually
20 members of the account management group. They
21 are just responsible for the -- that specific
22 task of documentation. So it's a specific
23 function within the account management group.

24 MR. WEEKS: It's a role, as opposed
25 to a person or title.

1 MR. CONNOLLY: Sort of there is a
2 staff set of functions that support the various
3 account teams, service teams that are assigned,
4 line functions if you will, contrasted --

5 MR. WEEKS: Yes.

6 MR. DELLA TORRE: That's correct.
7 In fact we felt the language wasn't clear
8 enough in the report and we will make a
9 revision.

10 MR. CONNOLLY: Okay.

11 MR. DELLA TORRE: Question 14: What
12 activities trigger the document specialist work
13 activities which are to make changes to, quote,
14 "external service management and sales
15 executive documents and process descriptions?

16 What inputs are provided to the
17 document specialist work in this area and which
18 organization provides them?

19 When the account management team or
20 organization has changes or updates to make in
21 its external documentation, including the
22 website, the information to be changed or
23 updated is provided to the document specialists
24 within the account team.

25 There are a number of possible

1 inputs that would include e-mail and verbal
2 requests from the account team management and
3 potentially as a result of CMP directives.

4 MR. CONNOLLY: So if there were a
5 new product that needed to be incorporated into
6 the service management portfolio, that would
7 get released somehow into the account
8 management staff organization and there is a
9 communications link that ultimately gets it to
10 the documentation specialist who would then
11 documents specially and posts it?

12 MR. DELLA TORRE: That's correct.
13 In fact, we saw an example that when the
14 response time intervals needed to be added to
15 the Qwest wholesale website, the account team
16 passed those updates on to their internal
17 document specialist who then went and made the
18 changes.

19 Question 15: Please describe the
20 evaluations conducted by KPMG Consulting in
21 which it examined the responsibilities assigned
22 to manage the document management function.

23 The techniques we used again are in
24 the evaluation methods. It was a review of
25 Qwest's account management M&Ps, interview with

1 Qwest personnel, as well as sort of artifacts
2 of the test and verification of outputs to the
3 document management function, i.e., changes to
4 the actual documents.

5 And in fact we raised an observation
6 in this area early on in the test when we felt
7 there was a disconnect between what was being
8 represented in the documentation on the website
9 and what was actually occurring operationally
10 internally. That was around the split between
11 the sales team and service team. That was
12 subsequently fixed.

13 Question 16: Please more fully
14 describe the nature of the management noted in
15 KPMG's statement, "senior management follow
16 production and distribution procedures."

17 The senior management personnel
18 referenced here are the sales director and
19 service director. Those folks have the
20 ultimate responsibility of ensuring the
21 documents are properly updated and distributed
22 to the relevant parties and to inform their
23 respective CLECs of updates to web sites and/or
24 other documentation.

25 I believe that is it. Other

1 questions on Test 24.3?

2 Denise?

3 MS. ANDERSON: Okay. I think it's
4 time for a break.

5 (Recess.)

6 MR. DELLA TORRE: We will start the
7 discussion of Test 24.6 with the Washington
8 state questions.

9 MR. WEEKS: The topics is OSS
10 interface Development Review. And this is
11 where we sort of looked over the shoulder of
12 the P-CLEC and others and tried to figure out
13 how that process works.

14 There are two not satisfieds in the
15 report. Those not satisfieds have to do
16 fundamentally with the existence of a separate
17 test environment that is separate from
18 production and the existence or lack of
19 existence of a test environment for MEDIACC.

20 The first is evaluation criteria
21 24.6-1-8. Qwest chose to take a closed
22 unresolved on exceptions 3077 and 3095, which
23 caused us to then evaluate as not satisfied,
24 because the issues didn't get resolved.

25 The other evaluation criteria is

1 24.6-2-9 that was a closed unresolved on
2 Qwest's part for exception 3109.

3 I think the record is real clear.
4 We've talked about these issues over and over,
5 the O & E calls and project management calls
6 and TAG calls and so on. I won't go into more
7 details unless Qwest wants to say anything.

8 That is where we sit on that. There
9 are no state-specific results that are relevant
10 in this particular test. These processes and
11 things work across the entire (inaudible) for
12 Qwest.

13 I think that is it for Washington
14 state-specific questions. Any follow-up?

15 Okay.

16 MR. DELLA TORRE: Okay. We will
17 start with AT&T, but before jumping into the
18 actual questions I think there is a concept I'd
19 like to talk about that I think might help us
20 as we move further into the questions.

21 And that is the notion of regression
22 testing. There are there are sort of two
23 different uses of the word regression or
24 concept of regression testing.

25 The typical industry use of

1 regression testing is the notion that you do a
2 complete test of a particular application after
3 a specific fix has been put in.

4 So a fix may only be designed to
5 affect or impact one particular element of an
6 entire application but you still test the
7 entire application to ensure that no other
8 changes or breaks occurred.

9 That is an industry sort of
10 definition of regression testing.

11 Regression testing I suppose with a
12 capital R or in quotes, as used by Qwest, is
13 really this idea of a separate set of testing
14 activities that a CLEC can request at their
15 discretion where they have the opportunity to
16 test, off line, if you will, for new releases
17 or even just to validate their own code if they
18 change systems, there is this sort of separate
19 type of testing that Qwest refers to as
20 regression testing.

21 There is another concept that Qwest
22 uses or another title called integration
23 testing which is an internal test that Qwest
24 conducts that is an end-to-end test of an
25 application to ensure that the whole app works

1 together, that each of the elements, when put
2 together as a package, works.

3 So that -- the -- there is really
4 more similarity between the Qwest-defined
5 integration testing and the industry-defined
6 regression testing than there is in the
7 Qwest-defined regression testing.

8 So I know that is a bit complex, but
9 that led to some questions and comments. So I
10 wanted to try and get that information out
11 there to begin with and you will see where that
12 comes up as we go forward.

13 MS. OLIVER: I'm not -- can I ask
14 you a follow-up? Becky Oliver, WorldCom.

15 I am not sure I am clear yet on how
16 you describe Qwest describes or defines
17 regression testing.

18 I followed that integration testing,
19 what that means, and that is correlated to what
20 the industry might typically define as
21 regression testing. But all I -- I got that
22 regression testing is a separate test --

23 MR. WEEKS: It's a negotiated scope
24 of predefined set of features and functions
25 that are going to be tested between the CLEC

1 and Qwest, and it can be done for a variety of
2 reasons. It can be done, as Joe said, because
3 either a CLEC has had changes on their side of
4 the fence and they want to test that their
5 software works vis-a-vis -- I said Qwest, I
6 meant CLEC. CLEC has initiated changes on
7 their side of the fence and they would like to
8 just check out their software and make sure
9 it's still compatible and working with Qwest's
10 current release.

11 It could be in anticipation of a new
12 release that Qwest is making of software on
13 their side and CLEC wants to make sure that
14 their software syncs up with Qwest's software.

15 It could be a variety of reasons
16 that trigger that test activity, if you will.

17 It's almost like a recertification.
18 I know the pseudoCLECs talked about a
19 certification process they go through. But
20 it's kind of like making sure the software
21 releases synchronize with each other between
22 the CLEC and the ILEC and it's a negotiated
23 scope.

24 MR. DELLA TORRE: Let me be clear.
25 There is the formal recertification process.

1 And that is actually progression testing. So
2 the word is a bit different there. That
3 progression testing is required of a CLEC to
4 become recertified for a new release or to
5 become certified as an initial entrant.

6 So that is progression testing.

7 Regression testing is, we had sort
8 of an informal language that we were using
9 where it is sort of a CLEC playground. There
10 is an opportunity for them to go in and test
11 and fool around with the app to make sure they
12 are working, connectivity is established, et
13 cetera. That is how regression testing is used
14 and defined.

15 MS. OLIVER: That helps. Thank you.

16 MR. DELLA TORRE: Okay. AT&T

17 question number 1:

18 Within which Qwest organization do
19 the EDI implementation teams report i.e. for
20 purposes of accountability?

21 Does the reporting change upon
22 assignment of an EDI implementation team to a
23 new entrant CLEC and does the EDI
24 implementation team become accountable to the
25 CLEC's service team?

1 There is a hierarchical structure
2 within the interconnect center of excellence
3 for the IMA EDI implementation team.

4 There is no change after the
5 assignment of an EDI implementation team to a
6 new CLEC in terms of reporting and
7 accountability and the EDI implementation team
8 does not subsequently become accountable to the
9 CLEC's service team.

10 MR. CONNOLLY: Our understanding was
11 that the EDI implementation team becomes
12 closely attached, if not amalgamated somehow,
13 within the service team during the period of
14 time that the CLEC is going through its
15 development and implementation.

16 MR. WEEKS: I think they
17 collaborate, coordinate. The distinction is
18 administrative reporting purposes of payroll
19 benefits, employee policies, those kinds of
20 things. Those official formal reporting
21 relationships remain intact as part of the
22 excellence team.

23 Obviously, there is going to have to
24 be a lot of coordination and cooperation
25 between the EDI team and the account team just

1 because they are working together to try to
2 satisfy the CLEC customer.

3 MR. DELLA TORRE: But it's not a
4 formal reporting relationship.

5 MR. CONNOLLY: And we wanted to
6 focus more on accountability than who approves
7 whose expense accounts.

8 In terms of the EDI implementation
9 team, we perceive that there is a bench that
10 the EDI implementers are available for
11 assignment and then when a project comes up
12 they get attached through a service team.

13 Is that a fair --

14 MR. DELLA TORRE: There is not a
15 formal attachment.

16 MR. WEEKS: We think it's looser
17 than that. Does Qwest want to comment on this?

18 MS. NOTARIANNI: This is Lynn
19 Notarianni. You are right. Organizationally
20 they don't report in, once they are assigned.
21 There is a bench of IT people that are assigned
22 out to the CLECs and there is a relationship
23 between the IT team and service manager. The
24 service manager will be involved, to varying
25 degrees, depending upon the work level of

1 activity that has to occur.

2 The service manager is accountable
3 for making sure that their CLEC is supported.

4 The IT team is account able for
5 making sure they as well are available to the
6 CLEC.

7 Where we typically see a
8 relationship there where you use a broad
9 definition of accountability as in situations
10 where if the CLEC feels they need to escalate
11 something, that will be escalated to the
12 service manager to deal with.

13 So I think in AT&T's case at least,
14 past history, when I have been around in
15 working with the EDI team, the service manager
16 has been very involved.

17 And it really just depends on what
18 that CLEC's needs are and how much they need to
19 get involved.

20 MR. CONNOLLY: Is that ISC, center
21 for excellence?

22 MR. DELLA TORRE: Interconnect
23 Center of Excellence.

24 MR. CONNOLLY: Thank you.

25 MR. DELLA TORRE: Question 2:

1 Please explain the meaning of the term
2 Requirements Review as it is used in this
3 section.

4 And the Requirements Review is the
5 stage in the development process where the CLEC
6 completes a review of all of the specifications
7 and relevant documentation.

8 This term is defined by Qwest in the
9 EDI implementation guidelines for IMA.

10 As an example, if a CLEC were
11 undergoing certification for IMA EDI, they
12 would complete a review of the disclosure
13 document and the EDI implementation guidelines
14 for IMA.

15 This particular phase, meaning the
16 requirements review, may run concurrently with
17 other phases in the process such as the actual
18 establishment of connectivity.

19 Question 3: How is it that the
20 Qwest service manager can send the CLEC user
21 questionnaire which includes necessary profile
22 information?

23 Is not one of the purposes of the
24 questionnaire to obtain profile information?

25 That is correct. It is a mistake in

1 the report that will be revised.

2 Question 4: Please provide the
3 meanings attached to "point release," as it is
4 used in this subsection.

5 Point releases are actually defined
6 in the definition of terms section of the
7 master red line CLEC Qwest CMP redesigned
8 framework document.

9 MR. CONNOLLY: You mean the same
10 here as defined in there?

11 MR. DELLA TORRE: Correct.

12 Question 5: At what volume of
13 internal CRs is the interface development
14 process initiated?

15 It is our understanding that there
16 is no set volume of internal CRs that initiates
17 the interface development process.

18 Those releases are scheduled and
19 whatever particular internal CRs have been
20 processed up to that point will be reflected in
21 the release.

22 MR. CONNOLLY: So we shouldn't read
23 a lot into the word "initiated," as it's used
24 in the third sentence there in, quote, Qwest's
25 interface development process is initiated by

1 the submission of internal CRs by Qwest
2 personnel?

3 I want to clarify that --

4 MR. WEEKS: Probably not. But we
5 will --

6 MR. CONNOLLY: That doesn't mean a
7 trigger, if not -- there are no CRs, there is
8 no --

9 MR. WEEKS: I think it would be fair
10 to say ever in the history there was a
11 scheduled release and no one wanted any
12 changes, that that release wouldn't be made. I
13 think that is a fair statement. I can't
14 conceive of a situation where that would ever
15 happened, but theoretically it's true.

16 MS. NOTARIANNI: This is Lynn
17 Notarianni for Qwest. Tim, the interface
18 development process is triggered anytime a CR
19 is issued.

20 So if you look at the interface
21 development processes, the end-to-end life
22 cycle of proper development and we need to deal
23 with all CRs whether we end up actually
24 producing software out the door or not, it's a
25 constant cycle of looking at CRs as they come

1 in the door, whether it's internally Qwest
2 generated or generated by CLECs and starting
3 that business requirement cycle and determining
4 what we need to do with it.

5 MR. DELLA TORRE: In fact, that is
6 confirmed by the language we have used and
7 understanding that we have, that the interface
8 development process which is not necessarily
9 indicative of the fact that the release will
10 happen tomorrow, but rather that the
11 development process is initiated by the
12 submission of internal CRs, each and every one.

13 MR. CONNOLLY: Isn't it also
14 initiated, if you will, by CLEC CRs?

15 MR. WEEKS: Yes.

16 MR. DELLA TORRE: Yes.

17 MR. WEEKS: The answer is yes. It
18 wasn't intended to be an exhaustive list --

19 MR. DELLA TORRE: Right.

20 MR. WEEKS: -- of the ways in which
21 a software development activity gets initiated,
22 it's trying the linkage between internal CRs
23 and the development life cycle is what that
24 sentence was intended to --

25 MR. CONNOLLY: So they are a key

1 input to the process?

2 MR. WEEKS: One of the triggers.

3 MR. CONNOLLY: They are not the
4 means by which it's triggered.

5 MR. WEEKS: It's not the sole
6 trigger, correct.

7 MR. DELLA TORRE: In fact, the new
8 release itself is dependent upon a number of
9 factors including changes to industry standards
10 or regulatory changes, the need for additional
11 functionality. So there are several other
12 factors that impact the decision for a new
13 release.

14 MS. TRIBBY: Mary Tribby with AT&T.
15 I am not sure, Mike, your follow-up statement
16 is absolutely accurate. I mean I think at
17 least historically Qwest has issued releases to
18 create improvements in their interfaces
19 regardless of whether those were triggered by a
20 CLEC CR. And there may be releases scheduled
21 simply for improvements that have come
22 internally from Qwest.

23 MR. DELLA TORRE: Absolutely.

24 MS. TRIBBY: Even if there has not
25 been any CLEC CRs that will be reflected in

1 that release since the last release came out.

2 MR. WEEKS: I would have to read
3 back my comments, but as I said what I was
4 saying, my mind was thinking that nothing I
5 said conflicts with what you just said. So I
6 guess I am a little confused as to what you
7 think I said , but --

8 MS. TRIBBY: Okay, just so the
9 record is clear what I thought you said is, in
10 the absence of a CLEC CR there would not be a
11 new release.

12 MR. WEEKS: No, I say in the absence
13 of no changes of any type.

14 MS. TRIBBY: Okay including --

15 MR. WEEKS: Including internal CRs.
16 If there was ever a case where there was a
17 scheduled release, Qwest didn't want and
18 changes, there weren't any bug fixes, there
19 weren't any regulatory changes, there weren't
20 any CLEC CRs, there was no change necessary to
21 the interface. If that ever happens in the
22 history of the world, my guess is that it would
23 be canceled.

24 A VOICE: One would hope.

25 MR. WEEKS: One would hope.

1 MR. DELLA TORRE: Question 6: KPMG
2 Consulting asserts the external CMP CR process
3 is subject to the processes, procedures and
4 policies governed by the wholesale change
5 management process.

6 What controls the internal CMP CR
7 process within Qwest?

8 Qwest's internal process for
9 tracking and managing changes is governed by
10 internal processes and procedures.

11 We did in fact review this process
12 as described in their internal methods and
13 procedures.

14 MR. CONNOLLY: And these are
15 documented and fully described?

16 Did you observe that they are being
17 followed or practiced in the normal routine of
18 things?

19 MR. DELLA TORRE: We didn't see the
20 live adherence to the process.

21 However, in lieu of that, we
22 examined artifacts of that process to confirm
23 that the process was in fact being adhered to
24 appropriately.

25 MR. CONNOLLY: Okay.

1 MS. TRIBBY: Mary Tribby from AT&T.

2 With respect to the first part of
3 Tim's question, that these internal practices
4 and procedures are well documented, is that the
5 case?

6 MR. DELLA TORRE: Yes.

7 MS. TRIBBY: All right.

8 MR. DELLA TORRE: Question 7: CMP
9 interface development-related CR may be
10 initiated by Qwest or by a CLEC and is
11 prioritized via the Qwest wholesale change
12 management process framework.

13 We agree with that and will revise
14 our report appropriately.

15 Question 8: During which stage(s)
16 of the software development life cycle is the
17 work performed to plan for the CLEC
18 documentation to be developed?

19 Test plans for CLEC documentation
20 are created during the code and UNE test phase.

21 MR. CONNOLLY: What about key CLEC
22 documentation such as EDI implementation
23 guides, user guides and such as that?

24 MR. WEEKS: The timing of the
25 release of those is governed by the change

1 management process.

2 Is that the question, or is it when
3 do they start working on it?

4 MR. CONNOLLY: It was my expectation
5 that you would be able to identify for us that
6 there is a task someplace that says I have to
7 issue the EDI implementation guidelines
8 corresponding with this release.

9 And somewhere in a previous project
10 life cycle is the statement, there is a task to
11 assemble the information necessary to later
12 perform that publication step.

13 So where in the life cycle are those
14 activities done to recognize that there is
15 documentation required and what do I have --
16 what does a person have to do in order to
17 gather that factual data to ultimately prepare
18 that documentation?

19 MR. DELLA TORRE: The implementation
20 or the execution of the documentation creation
21 is defined within the task plan.

22 But I don't believe that it is
23 defined as a rigid point in time throughout the
24 life cycle, because the life cycles are longer
25 and shorter in different cases.

1 So there is a task plan assembled
2 that defines roles and responsibilities, tasks
3 and time lines for each individual case. In
4 the early part, I believe the, they called it
5 UNE task phase, but then that task plan
6 identifies which groups are responsible for
7 what, including documentation creation. And
8 the varying complexity of the documentation
9 updates will impact the precise timing of when
10 that documentation is actually created or
11 updated.

12 MR. WEEKS: The life cycle calls for
13 the plan to be built during code UNE testing
14 and it's the specifics of what, how much, what
15 kind and how many dictate the contents of that
16 plan.

17 Then when those documents have to be
18 available, the end date of those is
19 particularly for the public CLEC documents by
20 the -- process.

21 So it's right to left scheduling and
22 the planning for all of that is done at code
23 unit testing.

24 MR. CONNOLLY: Is it KPMG's opinion
25 that that is an appropriate time, appropriate

1 stage in which to do that CLEC documentation,
2 at the code UNE test level?

3 MR. DELLA TORRE: Just to clarify
4 facts I would like to defer that question at
5 least for the task plan assembly to Qwest.

6 MS. NOTARIANNI: Lynn Notarianni.

7 Qwest actually starts and builds
8 into a project plan the information or the
9 tasks that need to be done to start developing
10 the documentation. After the candidates are
11 defined, that step you all defined on Page 575
12 of my document, anyways, called package and
13 initiate a release, because that is the first
14 opportunity the technical team has where there
15 is some sort of semblance of what is really
16 going to go into a release.

17 So they begin it at that phase. Of
18 course, it's significantly, it's shaped and
19 further defined with more granular detail as
20 you move through the steps.

21 So certainly coding and unit task is
22 going to give you another view of how the
23 system actually works and, therefore, you can
24 refine that documentation and start assuring it
25 at a very detailed level.

1 But we in fact started at package
2 and initiate a release and incorporate that
3 into the technical team's work plans.

4 MR. CONNOLLY: Thank you, Lynn.

5 MR. WEEKS: To answer the question
6 which you asked, is what we have just described
7 to you deemed by us to be appropriate, the
8 answer is yes.

9 MR. DELLA TORRE: Question 9:
10 During which stage of the software development
11 life cycle is the work performed to plan for
12 the CLEC communication packages, e.g., release
13 notifications, developer work sheets, et
14 cetera, to be developed?

15 Planning for the CLEC communication
16 package is not associated with a specific stage
17 of the software development life cycle.

18 It's actually dependent upon the
19 duration of the entire development.

20 MR. WEEKS: Again, it's kind of a
21 right to left scheduling exercise. As Lynn
22 indicated earlier, the thinking about it starts
23 early. Depending on what that activity yields
24 as being how big is the breadbox, they then put
25 that into the plan in the right to left

1 schedule so it starts when it should start so
2 it comes together at the end as it should.

3 MR. DELLA TORRE: The developer work
4 sheets are drafted at the beginning of the
5 development process but they are refined
6 throughout.

7 Question 10: Are "Release Team
8 leads" senior members of Qwest's technical
9 staff that lead the development of technical
10 components of the software release.

11 The answer is yes.

12 Question 11. Once coding is
13 finished and the unit testing is complete, the
14 complete IMA system is prepared for integration
15 and system testing.

16 Does this integration and system
17 testing involve both the EDI and GUI
18 interfaces.

19 We believe it involves both, EDI and
20 GUI.

21 And --

22 MR. WEEKS: We are distinguishing
23 here, Tim, between IMA, which is the back end
24 common piece from the interface components that
25 are IMA EDI and IMA GUI.

1 So when one tests IMA, and I am not
2 sure if we -- we interpreted IMA without any
3 suffix on your part as meaning that central
4 core, common back end that is the common piece
5 fed by both EDI and GUI.

6 So there is -- by testing that, by
7 definition you are testing its functionality
8 and that functionality applies to both of the
9 mechanisms, EDI and GUI, by which IMA, the core
10 is --

11 If you meant something different, we
12 will answer that question.

13 MR. CONNOLLY: I was trying to
14 determine in terms of the integration nature of
15 the testing, which I will rely on Joe's erudite
16 description of the industry standard, which I
17 certainly understood, that the IMA changes
18 being made may have consequences unique to EDI
19 or GUI.

20 But let's take this one example.
21 Let's say there is something unique to EDI.
22 That there would be a need for in the
23 performance of the IMA integration testing.
24 Qwest would internally emulate EDI transactions
25 coming into IMA and determine that whatever the

1 changes are were appropriately handled.

2 MR. WEEKS: That is our
3 understanding, is that when -- whatever
4 components need to change with the part of the
5 release, there is an integration test done to
6 make sure that the things that were working
7 continue to work and the things that are new or
8 different work as described or as needed to
9 change. And that that is the whole objective
10 of the integration test, is to start and test
11 all of the pieces and parts that it takes to go
12 from the CLEC giving us an order to, you know,
13 it's in SOP.

14 MR. CONNOLLY: Can we contrast that
15 with an IMA change that also manifests itself
16 in a modified GUI screen that perhaps displays
17 a different page or different form than it did
18 prior --

19 MR. WEEKS: It would be the same
20 way, that you, in order to finish your
21 integration test, consider that you have done a
22 valid integration test, if there are
23 components, either in the GUI itself or back in
24 the core IMA, that need to be tested in an
25 integrated way, that there would be a thorough

1 and competent integration test of the graphical
2 user interface flow, if you will, to the IMA
3 back in-house systems.

4 MR. CONNOLLY: So your expectation
5 would be that there would be some sort of user
6 or super-user emulating that terminal access.

7 MR. WEEKS: -- and going through the
8 process.

9 And again, we weren't there while
10 integration testing was actually going on. We
11 can't tell you from personal observations we
12 saw it happen.

13 But we did look at the artifacts
14 that Qwest creates as a by-product of doing
15 their software engineering integration testing
16 and saw evidence that they had conducted those
17 tests.

18 MR. DELLA TORRE: And with your
19 example of EDI we understand there are test
20 scenarios for GUI as well that will be
21 submitted to make sure that they work.

22 So by analogy it is the same for
23 GUI, that there are a set of scenarios designed
24 for the GUI that will be used to test.

25 MR. CONNOLLY: Thank you.

1 MR. DELLA TORRE: Question 12: Upon
2 creation of the internal CR by the tester, what
3 process is utilized to communicate that
4 internal CR to the Qwest CMP managers for
5 consideration for the planned release or future
6 release?

7 MR. WEEKS: For clarification, this
8 is in the situation where during the course of
9 testing a tester identifies that some other
10 further change needs to take place, that
11 something is broken or whatever.

12 MR. CONNOLLY: Correct. Your second
13 paragraph in item 6 says, if any problems are
14 found during integration or system testing the
15 tester creates an internal CR describing the
16 issue, so forth.

17 MR. WEEKS: Right. And this is to
18 distinguish from internal CRs that might have
19 been generated by other parties, like help desk
20 or something. These are the ones specifically
21 generated by the tester.

22 MR. DELLA TORRE: And those are not
23 communicated to the Qwest CMP managers as these
24 are internal CRs that are meant to address bugs
25 and that are encountered in the quality

1 assurance testing, which is an internal
2 activity.

3 So it's prior to the formal
4 deployment of that IMA code. So these are
5 not --

6 MR. WEEKS: This is not the case
7 where a tester is just loafing along and says
8 oh, let's add this function. It's not that
9 sort of situation. This is a situation where
10 testing is going on and the code doesn't work
11 the way it's supposed to work, and for
12 documentation purposes, so we don't lose track
13 of that bug, we are documenting that bug where
14 the system isn't operating the way it's
15 supposed to operate, the way it was designed in
16 the packages to operate, and we are just
17 documenting that bug fix that needs to be put
18 in prior, so it can be fixed, retested prior to
19 release.

20 MR. CONNOLLY: I think we have all,
21 those of us who have been on that side of the
22 business know when you are testing and you run
23 across just plain old bad code.

24 MR. WEEKS: Yes.

25 MR. CONNOLLY: Are these CRs

1 subjected to review such that whatever was the
2 origin of that bad code gets pulled out of this
3 release in order to send it back for repair and
4 implementation in a subsequent release?

5 MR. WEEKS: I think we would
6 characterize this -- I want to distinguish
7 between the instance of bad code, it works,
8 it's ugly, versus dysfunctional code, the code
9 doesn't work as designed.

10 In other words, you put in X. It's
11 supposed to produce Y. You put in X, it
12 doesn't produce Y. Literally a bug.

13 So bad code, if that is what you
14 meant when you said bad code, dysfunctional
15 code, then it would be fixed in this release
16 because it's supposed to work in this release.

17 In the case where I am cruising down
18 through code and it's poorly written algorithm
19 and it is inefficient and there might be a
20 better way to do it, but it's functional, did
21 we look at any of those cases? Do we know what
22 happens?

23 A VOICE: We received some output.
24 Again. Process.

25 In response to your question, Mike,

1 we did receive the -- some outputs of that
2 internal process.

3 MR. WEEKS: But did we see examples,
4 in the course of our work, where the nature of
5 the internal change request that was created by
6 the tester during testing, the purpose of that
7 change was to beautify the code that was
8 working. It was not a bug, we ought to
9 redesign this module, because it doesn't run
10 well or something, did we see instances of
11 those?

12 (Pause.)

13 MR. WEEKS: So the answer to our
14 question is we aren't sure what the underlying
15 business purpose of any of the internal CRs we
16 looked at is. I can't say whether we saw any
17 of those or not.

18 MR. CONNOLLY: Since we are talking
19 here about methodology as well as your
20 experience, procedurally what cares for or what
21 part of the methodology addresses the type of
22 CR detected during integration testing, the
23 type of problem that's detected during
24 integration testing, necessitating a CR, that
25 has to -- that can't get implemented in the

1 release? Is there a procedure for that?

2 MR. WEEKS: I am sure there is.

3 (Pause.)

4 MR. WEEKS: So the answer to the
5 question is there is a method and process, 1,
6 2, 3, 4 category of problems. 1 and 2 problems
7 have to be fixed before this release can go
8 out. 3s and 4s can be deferred to a subsequent
9 release.

10 So there is a formal process of
11 categorizing the CRs and disposition of that CR
12 in terms of when or what release it will go
13 into is driven off the categorization of
14 the CR.

15 MR. DELLA TORRE: I think we are
16 jumping between two different phases as well.
17 This is not the integration phase we are
18 talking about. This is prior to that, where an
19 internal CR is an identification of a software
20 problem or bug. This is a QA testing that is
21 sort of deeper in the organization or earlier
22 in the process.

23 MR. WEEKS: But the same process
24 happens no matter what the kind of testing is.

25 MR. CONNOLLY: Given that there is a

1 procedural routine here, do these detected
2 defects, issuance of CRs, severity code
3 assignments, so forth, go so far as to say, if
4 we have too many of these or there is one or
5 more so significant ones, I have to delay this
6 release?

7 MR. WEEKS: 1s and 2s by definition
8 would delay a release if we got to that case,
9 because the definition of 1 or 2 is a drop dead
10 issue. It has got to go in this release. If it
11 means delay the release, delay the release.

12 MR. CONNOLLY: So within the system
13 there is that recognition?

14 MR. WEEKS: There is that
15 recognition.

16 MR. DELLA TORRE: Question 13: Does
17 KPMG Consulting have any information as to
18 whether Qwest provided its IMA release 10
19 disclosure document according to the 73 day
20 schedule described in this subsection?

21 The answer is yes. It was released
22 on time.

23 MS. TRIBBY: This is Mary Tribby for
24 AT&T. Did you have any opportunity to review
25 other, I don't know if it's releases or

1 documentation that was supposed to be provided
2 to CLECs "X" number of days before a release
3 came out and were you able to review whether
4 that happened or not?

5 MR. DELLA TORRE: That would have
6 been covered in Test 23.

7 MR. WEEKS: So I think the answer is
8 yes. And any problems or issues we found in
9 that regard would have been raised in Test 23.

10 I know there was exceptions on that.

11 MR. DELLA TORRE: Exception 3110 in
12 fact which is still open is that very issue.

13 MS. TRIBBY: Thank you.

14 MR. CONNOLLY: Did your Test 23
15 coverage include IMA release 10?

16 MR. WEEKS: Yes, we did go back --

17 MR. DELLA TORRE: But not in its
18 entirety. And that is part of the reason these
19 are still open.

20 Question 14: What if any is the
21 equivalent resource provided for CLECs that use
22 the IMA GUI to submit orders to Qwest.

23 The IMA users guide contains common
24 error codes for the IMA GUI.

25 I believe we have referenced this

1 and described the IMA user's guide in Section
2 2.1.1.5.7 of the draft final report.

3 MR. CONNOLLY: So the 2.1.1.5.4
4 correlates to 2.1.1.5.7 --

5 MR. WEEKS: Yes.

6 MR. CONNOLLY: -- in terms of the
7 error provisions, EDI versus GUI respectively?

8 MR. WEEKS: Correct.

9 MS. TRIBBY: I am sorry, I want to
10 backtrack for a second to the last question.

11 Test 23 looked at which releases?
12 And were those in their entirety, as opposed to
13 10? Or was it just components of those?

14 MR. WOODHOUSE: Rick Woodhouse, KPMG
15 Consulting.

16 Test 23 covered those components of
17 release 10 that we were able to observe.

18 It is actually still in process.
19 The release hasn't even been implemented yet.

20 Yes, we have looked at previous
21 releases, as well.

22 MR. WEEKS: Which ones?

23 MR. WOODHOUSE: Release 6, 7, 8.

24 MR. WEEKS: Did you skip 9?

25 MR. WOODHOUSE: 9. We didn't look

1 at, for Test 23, this question is about?

2 MR. WEEKS: Yes.

3 MR. WOODHOUSE: Okay. We looked at
4 all those releases for Test 23.

5 MS. TRIBBY: And for those releases
6 would they have been looked at in their
7 entirety as opposed to the components that you
8 were able to look at for 10, or would it also
9 have been the same components for 6 through 9?

10 MR. WOODHOUSE: Similar components,
11 however the intervals hadn't been established
12 for CMP for those previous releases.

13 MR. WEEKS: There were aspects of
14 those releases we did examine but because the
15 intervals were established after those releases
16 were out, with respect to this issue of
17 intervals, we weren't monitoring intervals
18 between releases.

19 MR. DELLA TORRE: I believe we are
20 on question 15: Please explain the basis for
21 KPMG Consulting's statements about the
22 interface development methodology for MEDIACC
23 interface.

24 We formed our conclusions about the
25 development of MEDIACC as a result of

1 interviews with P-CLEC, interviews with Qwest,
2 interview with a commercial CLEC.

3 We also examined the methodology
4 which is defined and documented in the JIA
5 system test plan and the MEDIACC EBTA
6 implementation process documents.

7 MR. CONNOLLY: So that is a
8 different scope of development methodology that
9 Qwest provides contrasted with the development
10 methodology associated with IMA?

11 Is that correct?

12 MR. DELLA TORRE: Say that
13 differently please.

14 MR. CONNOLLY: No matter how I say
15 it again, it will be different.

16 (Laughter.)

17 MR. CONNOLLY: When we went through
18 the IMA development methodology sections, there
19 are procedural steps, integration testing, so
20 on, so on, so on, and so forth.

21 You didn't mention that sort of
22 documented methodology for the development of
23 MEDIACC. Is it they are not sort of documented
24 systems development methodology?

25 MR. DELLA TORRE: They do have a

1 documented systems development methodology.

2 They do differ. We did review them.

3 MS. TRIBBY: Did you say one
4 commercial CLEC?

5 MR. DELLA TORRE: Yes.

6 MS. TRIBBY: Can you identify that
7 CLEC?

8 MR. DELLA TORRE: No.

9 Question 16: Is it correct CLECs
10 would use a customer questionnaire to change
11 previously selected options for receipt of
12 billing media from Qwest?

13 Would this be an existing customer
14 questionnaire or would another form be used?

15 The answer is yes. And you would be
16 using the existing customer questionnaire and
17 update it. There is not another alternative.

18 MR. WEEKS: So you would up date
19 whatever the relevant sections of the customer
20 questionnaire were and resubmit it.

21 MR. CONNOLLY: Is there a separate
22 form for existing versus new?

23 MR. WEEKS: I believe it's the same
24 form in both cases. You just modify your
25 answers to a previously submitted --

1 MR. DELLA TORRE: Correct. You
2 update and resubmit the new customer
3 questionnaire.

4 MR. CONNOLLY: Thanks.

5 MR. DELLA TORRE: Question 17:
6 Please provide more information that more fully
7 explains what is meant by CLECs are not
8 required to formally develop interfaces for any
9 of the aforementioned electronic delivery
10 options.

11 What is meant here is that the
12 billing interfaces, not unlike CMR or GUI, IMA
13 GUI, those are existing interfaces that
14 certainly the CLEC needs to understand how to
15 receive the information from them and establish
16 the telecommunications connectivity as
17 discussed yesterday for an HPC question.

18 However, there is not a actual need
19 to design an interface by the CLEC as would be
20 the case with say IMA EDI or (inaudible) --

21 MR. WEEKS: It's fundamentally a
22 file transfer, so there is a protocol
23 established with moving the file from one
24 company to the other. We don't consider that
25 an interface in our definition of the word.

1 Obviously you have to build code on
2 your side to process the file, do things with
3 it. That is not what we consider part of the
4 interface. We consider that part of the CLEC's
5 OSSs.

6 MR. DELLA TORRE: Furthermore for
7 billing to elaborate further, we believe that
8 is typically a one-way data transformation, not
9 a two-way communications vehicle as an
10 interface would typically be defined.

11 MR. WEEKS: It's our use of the
12 (inaudible).

13 MR. CONNOLLY: I just wanted to be
14 clear. It seems what you are saying by not
15 requiring development of an interface is that,
16 that means no need to sit down and write
17 computer code to interact with Qwest on the
18 receipt and/or retransmission of any of
19 these --

20 MR. WEEKS: Right. Normally the
21 mechanisms used to accomplish the electronic
22 transfers are just utilities, and systems
23 software kinds of mechanisms that are already
24 in place in most operating environments.

25 MR. DELLA TORRE: Question 18:

1 Please confirm that CLECs are not required to
2 have an EDI translator to receive and process
3 DUF records received from Qwest.

4 I believe the distinction here may
5 be that it's EMI, not EDI.

6 MR. WEEKS: DUF isn't transferred
7 via EDI.

8 MR. CONNOLLY: Our question was on
9 the EDI 811 protocol.

10 MR. WEEKS: 811 is for bills, not
11 for DUF. I am looking at HPC. That's correct?

12 Right.

13 MR. CONNOLLY: Do the EDI 811s need
14 to be translated like the EDI order needs to be
15 translated?

16 MR. WEEKS: The wholesale bills, if
17 they come, if the CLEC selects 811 as the
18 format for receiving bills, not DUF, this
19 question was about DUF, then yes, you have to
20 translate those 811s into whatever you want for
21 your proprietary information.

22 HPC do you want to comment further
23 on that?

24 MR. MAY: No.

25 MR. WEEKS: Okay.

1 MR. CONNOLLY: DUF comes in EMI --

2 MR. WEEKS: -- file transfer, flat
3 files.

4 MR. DELLA TORRE: Question 19:
5 Please explain the inconsistencies between the
6 statements that describe the IMA EDI
7 implementations performed by H-P, as described
8 in this section, and those described in test
9 report 12-B.

10 And the discrepancy is, I believe,
11 primarily around the IMA release 7.0. And
12 initially the 7.0 implementation of HPC did go
13 through the recertification process for 7.0,
14 but initially this was for volume testing only.

15 On March 29th of 2000, there was a
16 discussion with TAG and a position paper
17 regarding IMA 7.0 of which I believe most of
18 the parties here were participants and agreed
19 that the volume testing of the IMA EDI
20 interfaces would be executed in version 7.0 and
21 IMA EDI certifications would be an artifact of
22 the test rather than the subject of an
23 evaluation.

24 So there is the difference between
25 the need to go through that certification for

1 execution of the test which H-P did versus our
2 requirements to evaluate that, which here we
3 did not.

4 Question 20: Please provide more
5 information that more fully explains what is
6 meant by once a CLEC has chosen the data
7 format, transport mechanism, and connection
8 type, they have completed the interface
9 process.

10 And we are actually going to be
11 revising the report to include an additional
12 step in that series. Once a CLEC has chosen
13 the data format, transport mechanism,
14 connection type, and has received a file.
15 That's what the new language will reflect, that
16 there is a step there that was not included
17 initially.

18 MR. FINNEGAN: Joe, this is John
19 Finnegan. Could I go back to 19 for a second?
20 I want to make sure I didn't hear something
21 incorrectly.

22 MR. DELLA TORRE: Sure.

23 MR. FINNEGAN: I thought you had
24 said the decision to go with 7.0 only for
25 volume test, not for functionality, was an

1 agreement of the TAG. Did I hear that
2 correctly?

3 MR. DELLA TORRE: There was a
4 position paper presented to the TAG in March,
5 2001. Then the quote from that paper is,
6 "Volume testing of the IMA EDI and GUI
7 interfaces will be executed in version 7.0.
8 The IMA EDI certification will be an artifact
9 of the test rather than the subject of the
10 evaluation."

11 MR. FINNEGAN: I just wanted to make
12 sure the record was clear. This was the
13 subject of an impasse, rather than TAG
14 agreement?

15 MR. DELLA TORRE: Noted.

16 MS. ANDERSON: But we actually
17 used 8.

18 MR. WEEKS: That's correct.

19 MS. ANDERSON: Okay.

20 MR. WEEKS: But the difference --

21 MR. DELLA TORRE: It's a timing
22 issue.

23 MS. ANDERSON: I understand. I
24 wanted to make sure there wasn't any lingering
25 confusion.

1 MR. FINNEGAN: A very clear record.

2 MS. ANDERSON: I remember that one
3 quite well.

4 MR. DELLA TORRE: Question 21.

5 MS. OLIVER: Becky Oliver, WorldCom.
6 A follow-up on the response to
7 question 20.

8 MR. DELLA TORRE: Yes.

9 MS. OLIVER: Can you expand upon --
10 you say KPMG will be adding in that after a
11 CLEC has chosen items listed there "and
12 received a file"?

13 MR. DELLA TORRE: Yes. There is a
14 final step in the process for completing that
15 interface process if you will, that there is a
16 confirmation of connectivity that a final file
17 is sent to confirm.

18 And the receipt of that file, then,
19 completes the process. We failed to specify
20 that.

21 MS. OLIVER: You are fully referring
22 to a validation which is a joint effort, which
23 would be a joint effort between Qwest and the
24 CLEC to verify connectivity?

25 MR. DELLA TORRE: That's correct.

1 MR. WEEKS: The CLEC resellers guide
2 OSS interfaces articulates this process and
3 steps and activities and roles and
4 responsibilities. We just inadvertently left
5 off the final step of the process here.

6 MS. OLIVER: Okay. I guess I am
7 just trying to note that there is additional
8 work behind it. I don't think we have any
9 dispute here, but I would just suggest that
10 maybe some additional detail be provided
11 between, if you are just planning to add
12 received a file, when in fact there is really
13 work that is going on to confirm the
14 connectivity and that is a step establishing
15 that interface process.

16 This kind of gets back to earlier
17 conversation about KPMG's definition of an
18 interface maybe not including a transport
19 mechanism, where I am trying to make the point
20 here that setting up that transport mechanism
21 or verifying the connectivity is a requirement
22 that needs to be acknowledged for the CLEC.

23 MR. WEEKS: I think it clearly is in
24 that document.

25 MS. OLIVER: Okay.

1 MR. DELLA TORRE: Question 21: What
2 is KPMG Consulting's perspective on the
3 adequacy of the quality testing provisions that
4 fail to provide for user testing of the IMA EDI
5 software?

6 We are actually going to request
7 that AT&T provide a little clarification on the
8 subject of the question.

9 MR. CONNOLLY: As we read through
10 your comments on 24.6-1-2, we don't see that
11 there is any provision at all for user
12 involvement in testing of the -- at any point
13 during the interface development process.

14 And so our question is, is that
15 absence of a provision like that, does that
16 seriously undermine the methodology?

17 MR. WEEKS: By user testing do you
18 mean internal users, people at Qwest simulating
19 CLECs, or do you mean real people out in the
20 real world, real CLECs when you say users?

21 MR. CONNOLLY: When I looked through
22 your comments, I don't find any users are
23 addressed as attached to the methodology.

24 And I may have missed something --

25 MR. WEEKS: I don't think we use

1 that phrase, per se.

2 MR. DELLA TORRE: No, there is --
3 the list -- let me see if I have this right.

4 Test plans describing testing
5 methodology, test cases and other test
6 conditions are created by the system test and
7 integration test teams for the use in
8 respective tests.

9 System testing, integration testing
10 and user acceptance testing are also performed
11 on -- I am sorry, is that not --

12 MR. CONNOLLY: I am looking for the
13 IMA user testing. I see --

14 MR. WEEKS: SATE is an environment,
15 not the system. IMA sits inside of SATE which
16 is an environment with a label for an
17 environment that those systems softwares sit
18 in. Substitute for SATE the test environment
19 or test system.

20 User acceptance testing --

21 MR. DELLA TORRE: There is internal
22 user testing prior to CLECs getting a look at
23 it for SATE and the GUI and interop. There is
24 user acceptance testing. I think we identify
25 that in the comments here.

1 MR. CONNOLLY: Are you saying to me
2 that Qwest's internal test environment for a
3 new release of IMA --

4 MR. WEEKS: Right --

5 MR. CONNOLLY: -- that is also known
6 as SATE?

7 MR. WEEKS: No, that is not what I
8 am saying.

9 MR. CONNOLLY: Where does that
10 embryonic system sit as it's going through
11 integration testing, what environment is that?

12 MR. WEEKS: Qwest, do you have a
13 name for that environment?

14 MS. KING: Yes. This is Beth King.
15 Those are our internal development environments
16 and they mirror what will be placed eventually
17 into production in Interop and SATE.

18 MR. WEEKS: There are Qwest people
19 playing the role of users as if they were
20 CLECs, in those test environments, doing what I
21 think you are describing here, which is user
22 acceptance testing?

23 MS. KING: That's correct, following
24 the test plans, documented test plans.

25 MR. CONNOLLY: Your evaluation

1 doesn't address that.

2 MR. WEEKS: In this criteria, is
3 this you are talking about SATE? If so, that
4 is why not.

5 MR. CONNOLLY: I thought this was
6 talking about IMA.

7 MR. WEEKS: IMA is a piece of
8 software, not an environment. So IMA sits in
9 this integrated test environment as an
10 application.

11 SATE is an environment used by CLECs
12 for testing. IMA sits in that as well.

13 So -- then the question is?

14 MR. CONNOLLY: In this section, this
15 test cross-reference, we are talking about
16 testing the integration testing for this new
17 release of IMA.

18 MR. WEEKS: So this is 24.6-1-2.

19 MR. DELLA TORRE: We distinguish
20 between EDI and GUI here. But it is IMA EDI
21 and IMA GUI. We say Qwest conducts internal
22 code tests, unit tests, integration tests and
23 system tests on IMA EDI software code prior to
24 deployment.

25 We go on to say that system testing,

1 integration testing, and user acceptance
2 testing (inaudible) on SATE and further down,
3 Qwest conducts code review, unit testing,
4 integration testing, system testing and user
5 acceptance testing on IMA GUI software code.

6 So I think we are hitting all of the
7 three elements.

8 MR. CONNOLLY: In the second
9 paragraph in this test cross-reference --

10 MR. DELLA TORRE: Right.

11 MR. CONNOLLY: -- where you are
12 talking about the testing done on IMA EDI
13 software.

14 MR. WEEKS: Yes.

15 MR. CONNOLLY: I don't see that
16 there is any user testing mentioned.

17 MR. WEEKS: The phrase user testing
18 is not there. It is done.

19 MR. CONNOLLY: It's within the
20 methodology.

21 MR. WEEKS: Baked into the
22 methodology. So there is software pieces that
23 simulate users. EDI by definition isn't human
24 interactive.

25 So there is a test robot vehicle

1 mechanism that sits inside of this environment
2 that simulates the software that exists inside
3 of the CLEC to send EDI transactions to Qwest.

4 MR. DELLA TORRE: For a matter of
5 language here, system testing, a component of
6 system testing is user acceptance testing.

7 We can put that in there as it
8 identifies system testing, and one component of
9 that is the user acceptance testing.

10 MR. WEEKS: User being a piece of
11 software, not a human being.

12 MR. DELLA TORRE: We can revise the
13 report to reflect that.

14 MR. CONNOLLY: It's a piece of
15 software on behalf of the CLEC.

16 MR. WEEKS: In an EDI environment
17 there is no human being, period.

18 MR. CONNOLLY: Understood.

19 MR. WEEKS: As the OSS CLEC I will
20 have systems that allow me to interact with
21 human beings that will collect the requirements
22 what have needs to be in the LSR.

23 But then there is another piece of
24 software in that environment that manufactures
25 the EDI segments that actually gets sent to

1 Qwest.

2 So the user of the EDI interface at
3 a CLEC is not a human being, it's a piece of
4 software.

5 MR. CONNOLLY: And there is
6 emulation of that organism on the CLEC side
7 that is present within the systems development
8 testing arena of Qwest.

9 MR. WEEKS: Precisely.

10 MS. ANDERSON: Well, I am glad you
11 cleared that up.

12 MR. WEEKS: That's almost as much
13 fun as the (inaudible) concept.

14 MS. ANDERSON: I think now might be
15 a good time for our lunch break. We are not
16 quite halfway through AT&T's questions on this.
17 Then we have some from WorldCom.

18 Why don't we come back at 10 after 1
19 and we should be able to finish in a very
20 timely fashion.

21 (Luncheon Recess.)

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AFTERNOON SESSION

* * * * *

MS. ANDERSON: Jackie, you said Qwest was prepared to do a couple follow-up questions before we get started, the bug fix thing from yesterday and something else?

Any problem with just going ahead and doing that, Joe? (Inaudible) yes.

Why don't we begin. They can go ahead and chat over there.

Do you want to give the questions?
I think that was --

MS. DONALDSON: I am going to start with Test 16 done Jackie Donaldson from Qwest.

There was a question in Test 16, question number 25, from AT&T.

Question: What is the band width of the connection between steps T-3 and T-4 and between T-5 and T-6 in figure 16-2.

And the answer to that question is it is a 100-base-T ethernet connection which is a hundred megabits per second.

The next follow-up question is from Test 24.7. WorldCom question number 10:

What happens to IT troubles that are

1 closed with the date TVD disposition code?
2 Specifically what does the wholesale systems --
3 does the wholesale systems help desk continue
4 to track the issues until they are resolved?

5 And the issue is actually considered
6 closed from a wholesale systems help desk
7 standpoint when it's assigned this date TVD
8 status.

9 However, those items are reported
10 out on a monthly basis via the CMT process as
11 far as current status of whether those items
12 are targeted for a release.

13 MS. OLIVER: Thank you.

14 MS. DONALDSON: And then the final
15 follow-up was also from Test 24.7.

16 Question number 6 from AT&T. And
17 the question was regarding in cases where a
18 patch is issued to resolve an operational
19 problem, what are the procedures that are to be
20 followed to record the underlying problem in a
21 change request and have that CR become the
22 requisition for permanent correction.

23 Tim, I believe the answer to your
24 question there is that generally that Qwest
25 would not install a short-term software fix,

1 that typically those fixes will be installed as
2 part of a patch release.

3 And if, in fact, we needed to
4 install a different fix in a subsequent
5 release, that that would still be tracked
6 through the final resolution of that open bug
7 fix, or that open bug.

8 Does that make sense, Tim?

9 MR. CONNOLLY: If that's the way it
10 works, yes.

11 MS. ANDERSON: Be sure and capture
12 that. Lynn, did you have your hand up for
13 something?

14 MS. NOTARIANNI: Beth also did some
15 research on the directory listings issue from
16 this morning. If we could cover that and get
17 that out of the way, that would be good.

18 MS. ANDERSON: Sure.

19 MS. KING: This is Beth King with
20 Qwest.

21 This is in regards to AT&T's
22 question 14 for Test 10. I am sorry. 13 for
23 Test 10. The question was in regards to the
24 directory listings inquiry Qwest preparation
25 guide and the directory listings inquiry system

1 users guide.

2 And the question pertained to when
3 these were released and why they were unique
4 documents.

5 The directory listing inquiry Qwest
6 preparation guide is actually a subset of the
7 LSOG documentation and it was released February
8 25th, 2002, to coincide with that functionality
9 being added to IMA in release 9.0. That is why
10 that was released on February 25th, 2002. That
11 was new functionality at that time.

12 The directory listing inquiry system
13 users guide is a unique GUI interface provided
14 by Qwest initially released August 30 of 2001.
15 And the initial release of the documentation
16 noted here was that same date. That is a
17 unique interface, it is not the IMA GUI
18 interface.

19 MR. CONNOLLY: Do you know why
20 there's different dates represented in the H-P
21 document?

22 MS. KING: You are looking at the
23 latest release. They were updated.

24 MR. CONNOLLY: Release 1.

25 MS. KING: 1.04 for the directory

1 listing inquiry system user guide.

2 For the directory listing Qwest
3 preparation guide, that coincides with the
4 initial release January 25th, excuse me,
5 February 25th.

6 MR. CONNOLLY: Okay, thank you.

7 MR. MAY: I think you said WorldCom.
8 I believe it was AT&T.

9 MS. KING: I am sorry.

10 MS. ANDERSON: She said AT&T. I
11 wrote down AT&T 13 when I was listening to her.

12 MR. MAY: Never mind.

13 Anymore follow-up questions or
14 answers?

15 MS. ANDERSON: Anymore follow-up
16 questions or answers?

17 MR. DELLA TORRE: We left off with
18 question 22 for 24.6.

19 In what ways are the groups that
20 perform the specification development and
21 documentation work for EDI interfaces related
22 to the groups that perform such work for the
23 GUI interfaces.

24 EDI and GUI documentation groups are
25 separate.

1 There is a relationship certainly at
2 the back end and in the middle are sort of
3 systems for EDI and GUI.

4 Therefore, the specification
5 development for those is the same.

6 However, the front end itself is of
7 course, by definition, a separate interface
8 and, therefore, those groups are different .

9 Question 23: KPMG Consulting states
10 CLECs using the IMA GUI do not have to develop
11 an interface. As such, carrier-to-carrier
12 testing is not required for IMA GUI.

13 Please confirm Qwest makes no
14 provision for a testing environment for the IMA
15 GUI.

16 That is correct.

17 Question 24: KPMG Consulting
18 reports Qwest corrected the issue and committed
19 to training help desk personnel to ensure that
20 transactions are handled and processed
21 accurately.

22 Please describe KPMG Consulting's
23 perspective on the risks attached to the use of
24 interoperability testing by CLECs that they
25 could also experience the problems detected by

1 the P-CLEC.

2 The issues that we encountered in
3 assessing interop testing were identified and
4 deficiencies were identified in exception 3029.
5 That is extent of the findings that we can
6 share or represent on interop testing.

7 MR. CONNOLLY: I am trying to
8 remember how to say this famous (inaudible)
9 quotation about a test at a point in time.

10 But is it correct for me to
11 understand the problems that were experienced
12 that necessitated exception 3029 were remedied
13 by Qwest's corrective steps?

14 MR. DELLA TORRE: That's correct.

15 MR. CONNOLLY: But there is no
16 reason to believe that those problems or
17 problems like those could not recur for a CLEC
18 going through interoperability testing?

19 MR. DELLA TORRE: It's our
20 understanding that the fixes, the problems and
21 subsequent fixes were not CLEC specific.

22 MR. WEEKS: P-CLEC specific. That
23 they were generic changes made to the
24 underlying process.

25 If a CLEC were to experience the

1 kinds of problems that the pseudo-CLEC
2 experienced, it would be because of a breakdown
3 in the process that we tested and found
4 working.

5 MR. CONNOLLY: That you.

6 MR. DELLA TORRE: Question 25:

7 Please provide KPMG Consulting's
8 perspective on adequacy of Qwest support for
9 CLECs conducting regression testing for EDI
10 interfaces.

11 Is the fact that the limited support
12 for regression testing is provided exclusively
13 via e-mail statement a reflection of concerns
14 on KPMG Consulting's part that the support
15 level is less effective and efficient than that
16 provided for progression testing?

17 The answer is no. As we identified
18 earlier, regression testing and progression
19 testing serve different purposes.

20 MR. CONNOLLY: Excuse me, Joe. If
21 we were to take IMA 9 as an example. For a
22 CLEC operating under IMA 8, was recertification
23 required for moving to IMA 9.

24 MR. DELLA TORRE: Yes, through
25 progression testing, not regression testing.

1 MR. CONNOLLY: That was because
2 there were new products made available in IMA 9
3 that were not available in IMA 8; is that
4 correct?

5 MR. DELLA TORRE: Certification is
6 required for any product that is being provided
7 in the new release.

8 MR. CONNOLLY: Well, if there
9 were -- was there recertification required for
10 resale products in IMA 9 or a CLEC operating
11 under resale for IMA 8?

12 MR. DELLA TORRE: We can not confirm
13 that is a yes or no answer, however it is our
14 understanding the P-CLEC is required to go
15 through recertification.

16 MR. MAY: Recertification.

17 MR. CONNOLLY: Recertification is,
18 involves different processes than
19 progressive -- progression testing; is that
20 right?

21 MR. DELLA TORRE: Progression
22 testing is what is used to certify. And to
23 recertify.

24 MR. WEEKS: Same process, slightly
25 different purpose.

1 MR. DELLA TORRE: Qwest, is there an
2 opportunity to clarify?

3 MS. NOTARIANNI: Not on that last
4 point. That is correct.

5 I just wanted to make a general
6 statement on the discussion previous to that
7 around the recertification in 9.0, in
8 particular. The general rule of thumb is that
9 if there is a change in an existing product or
10 capability to where there is either a change to
11 the business rules or change to an EDI map,
12 then the CLEC is going to need to recertify to
13 the next release.

14 It's my understanding that there was
15 both -- that occurred both for products as well
16 as functionality between 8.0 and 9.0 and in
17 particular some of it was for resale.

18 So there was recertification
19 required.

20 MR. CONNOLLY: So when a CLEC is
21 recertifying on an upgraded release, as Lynn
22 said, for business rules or products, the
23 support provided by Qwest for that sort of
24 progression testing is interactive, direct,
25 sort of handholding?

1 MR. WEEKS: Not as being described
2 here.

3 MR. DELLA TORRE: That's correct.
4 It's more robust than the regression testing
5 support.

6 MR. CONNOLLY: So that the more
7 passive type of testing where a CLEC is making
8 sure its system continues to function, that's
9 regression testing?

10 MR. DELLA TORRE: Correct.

11 MR. CONNOLLY: Problems detected
12 during that are E-mailed as a problem and
13 resolution comes back as an e-mail, sort of --
14 that sort of test --

15 MR. WEEKS: Kind of low tech, low
16 interaction.

17 MR. CONNOLLY: Thank you.

18 MR. DELLA TORRE: Question 26: Did
19 the P-CLEC experience e-mail support for its
20 regression testing?

21 The answer is no. The P-CLEC did
22 not conduct software testing for the ROC.

23 MR. WEEKS: This question is being
24 asked within the context of SATE, which is the
25 basis for (inaudible).

1 MR. DELLA TORRE: Question 27: KPMG
2 Consulting advises SATE can support up to three
3 versions of IMA EDI at any given time.

4 Qwest policy is to have the newest
5 version of IMA EDI available in SATE one month
6 prior to its release into production.

7 Please describe the evaluation steps
8 taken by KPMG Consulting to verify that the
9 Qwest SATE conforms to these requirements.

10 KPMG Consulting examined release
11 notifications to determine when a new release
12 was deployed in SATE and its production.

13 The notices indicated which version
14 of IMA EDI was installed and when it was
15 installed. KPMG Consulting also verified
16 through Qwest communicator notifications that
17 SATE was available 30 days prior to production
18 employment for IMA 8.1 and 9.0. KPMG
19 Consulting was also available to verify IMA
20 versions 7, 8 and 9 were all concurrently
21 supported in SATE.

22 MR. CONNOLLY: Through examination
23 of these notifiers, communicators?

24 MR. DELLA TORRE: Correct.

25 MR. CONNOLLY: Thanks.

1 MR. DELLA TORRE: Question 28:

2 KPMG Consulting states Qwest has a
3 documented process in place for ensuring that
4 the version of IMA EDI that is loaded into SATE
5 matches the version of IMA EDI that is or will
6 be loaded in the production environment.

7 Please describe the evaluation steps
8 taken by KPMG to verify that the Qwest SATE
9 conforms to these requirements.

10 KPMG Consulting reviewed the
11 documented process for synchronizing IMA and
12 SATE. We then requested copies of the inputs
13 and outputs of the process such as production
14 logs, meeting minutes, screen shots of internal
15 web sites announcing upcoming IMA CRs.

16 Based on the documentation review,
17 KPMG Consulting determined that Qwest is
18 adhering to the documented process.

19 Question 29: KPMG Consulting
20 reports during all phases of the IMA EDI
21 testing, if problems with the software or
22 specifications are encountered that require
23 Qwest to make changes to their systems and
24 documentation, the EDI implementation team will
25 create an internal CR in their internal

1 tracking systems, DDTS.

2 Please explain the processes and
3 procedures utilized by Qwest to effect the
4 changes into the production version of the
5 system, prior to its implementation.

6 Please also explain the testing
7 processes that are required to verify that the
8 internal CR, when implemented into the
9 production system, has no negative effect on
10 all previously completed testing.

11 When the internal CR is created,
12 that CR is forwarded to the IMA development
13 people. The development team addresses the
14 particular CR by fixing that problem and
15 testing to see that the correction has been
16 applied.

17 The development team also performs
18 code testing and unit testing of the CR.
19 Separate teams also conduct integration testing
20 and system testing before implementing the
21 production version of the system as part of the
22 IMA release schedule.

23 So there is both the local, the
24 local fix made to that CR by the development
25 team. And then there is the more global

1 integration and systems testing that happens
2 subsequent to that. And just as a matter of
3 fact, the user acceptance testing is included
4 within the systems testing we reference.

5 Question 30: Please confirm that
6 the EDI implementation team does not prepare
7 trouble tickets that are equivalent to those
8 prepared by the wholesale help desk upon its
9 receipt of a CLEC reported problem.

10 That is true. The EDI
11 implementation team does not prepare trouble
12 tickets.

13 Question 31: Please describe the
14 criteria applied by Qwest in determining
15 whether a change to software or documentation
16 has impact on CLECs.

17 Please provide KPMG Consulting's
18 evaluation of the adequacy of those criteria.

19 KPMG Consulting assessed internal
20 confidential MMPs describing these particular
21 criteria and we evaluated the adequacy of those
22 under Test 23, criteria 23-3.

23 Furthermore, we identified an issue
24 with those criteria and described that under
25 the context of observation 3066.

1 Question 32: KPMG Consulting notes
2 that CLECs are notified via communicators.
3 Please identify all other terminologies of
4 which KPMG Consulting is aware that Qwest uses
5 to categorize such notifications to CLECs
6 including but not limited to mail-outs, notices
7 to CLECs and resellers.

8 The terms that we have seen for
9 notifications are in fact mail-outs, release
10 notifications, communicators, customer
11 notification letters.

12 And we believe these terms have been
13 used somewhat interchangeably by Qwest
14 personnel during the interviews.

15 Qwest, do you know of other acronyms
16 or labels, pseudonyms?

17 MS. NOTARIANNI: I'm Lynn
18 Notarianni. Not that I am aware of.

19 MR. CONNOLLY: Are there certain of
20 these terminologies that were in use and are no
21 longer in use?

22 MR. WOODHOUSE: Rick Woodhouse, KPMG
23 Consulting.

24 During the course of the test the
25 term mail-outs was, I believe it was introduced

1 during the course of our testing. That was a
2 new term that was used.

3 But by and large, the terms have
4 been in place for quite some time.

5 MR. CONNOLLY: Were any of these
6 terms retired when -- during your review of
7 things?

8 MR. WOODHOUSE: Not that we are
9 aware of, no.

10 MR. CONNOLLY: Qwest?

11 MS. KING: Currently Qwest is going
12 through a standardization of the notification
13 through the customer notification letter. Web
14 page, you will find, you are starting to see
15 the standardization of the terminology.

16 I wouldn't say any of these have
17 been terminated in that somebody may still
18 verbally say to you a release notification.
19 But we are standardizing when you see the
20 e-mails come out and we post it on the web page
21 to always use the same terminology.

22 MR. DELLA TORRE: And that term is
23 customer notification letter?

24 MS. KING: Yes.

25 MR. CONNOLLY: Would release

1 notifications be a subset of those customer
2 notifications? Or is that going to be
3 something different?

4 MS. KING: Release notifications
5 will not be a subset of them. It will be an
6 interchangeable terminology that will be
7 eventually retired. You will not hear the term
8 release notification.

9 So yes. It is the same thing as a
10 customer notification letter.

11 MR. CONNOLLY: Then --

12 MR. WEEKS: Would it be fair to say
13 one of the potential types of things one could
14 communicate in a CNL is the notification of the
15 new release? It would be in effect the subject
16 of a potential CNL.

17 MS. KING: Yes, a subset of a
18 customer notification letter could be the
19 notification of a new release.

20 Release notification was not used to
21 mean that direct term. Okay?

22 MR. CONNOLLY: Doesn't that create a
23 pickle?

24 MS. ANDERSON: A what?

25 MR. CONNOLLY: Pickle.

1 MS. ANDERSON: As in dill or sweet?

2 MR. WEEKS: I don't think he thinks
3 it's sweet.

4 MR. CONNOLLY: We have a PID, PO 16,
5 which relies heavily on the term release
6 notification to mean --

7 MR. WEEKS: Notification release.

8 MR. CONNOLLY: -- a certain level of
9 communication about certain things that happen
10 with OSS interface. Is it Qwest's plan to
11 modify PO 16 to conform with this change in
12 customer notification letters?

13 MS. ANDERSON: I thought there was
14 new language either out or coming on that.

15 MR. CONNOLLY: Yes, there is some
16 review of PO 16, but it is not along these
17 lines, it is along several other lines.

18 MS. HUFF: This is Loretta Huff from
19 Qwest. There is work under way to clarify the
20 naming convention so that it will be very
21 simple and clear to identify which customer
22 notifications are included in the various PO 16
23 measures.

24 MR. DELLA TORRE: Question 33 --

25 MS. OLIVER: Excuse me --

1 MR. DELLA TORRE: -- right after
2 Becky Oliver from WorldCom.

3 MS. OLIVER: Thank you. Real quick.
4 I didn't catch the four terminologies that you
5 listed out at the beginning of the response.

6 MR. DELLA TORRE: Sure. Mail-outs,
7 release notifications, communicators, and
8 customer notification letters.

9 MR. WEEKS: Even though it's not a
10 letter, it's an e-mail.

11 MR. DELLA TORRE: Mike, you just
12 missed a wonderful little PID discussion.

13 A VOICE: Did you get the answer you
14 needed?

15 MR. WEEKS: Yes.

16 MR. DELLA TORRE: Question 33.
17 Please explain the reasons KPMG Consulting
18 makes no comment or finding on the timeliness
19 of the updating and notification to CLECs of
20 changes in business rules and software changes
21 in this test.

22 In fact, the timeliness of updating
23 a notification to CLECs of changes to business
24 rules and software is actually an object of
25 Test 23.

1 And more specifically, evaluation
2 criteria 23-9. Timeliness is not part of 24.6.

3 Question 34: What meaning does KPMG
4 Consulting attach to the term "user" in this
5 test cross-reference.

6 I think this gets back to what we
7 were discussing earlier where this, the term
8 user refers to an internal or a Qwest internal
9 team member who is responsible for conducting
10 the user acceptance test.

11 Question 35: Please clarify the
12 evaluation criteria to more fully explain what
13 is being evaluated.

14 It is AT&T's understanding that
15 changes to the systems are recorded in change
16 requests which are subjected to systems
17 analysis, system design, systems development,
18 testing and implementation.

19 What are the changes that are found
20 during all phases of testing?

21 Are these unexpected consequences of
22 the introduction of revisions to the system
23 that arise during testing?

24 Are these corrections to alleviate
25 the unexpected consequences to systems?

1 And also as discussed earlier, these
2 changes are really referencing bugs, errors,
3 omissions to the code during internal testing
4 that are uncovered during the internal quality
5 testing, or the carrier-to-carrier testing, or
6 in the production use of the interface. It's
7 really a bug detection and repair.

8 Question 36: Please explain the
9 term "instances of software code" as it is used
10 in test cross-reference.

11 And that means the specific version
12 of the code that may exist in the different
13 environments that are out there, meaning one of
14 the test environments like IMA or MEDIACC, or
15 CTE, if you will, as an acronym for the testing
16 environments, or the production environment is
17 another possibility. The internal development
18 environment is a third possibility.

19 So each of those environments would
20 have an instance of the software code.

21 MR. CONNOLLY: And so I understand
22 how this works, there are, there is a
23 methodology, a set of responsibilities,
24 procedures, that, for a problem that is
25 detected and a fix implemented in one of these

1 instances is migrated to the others?

2 MR. DELLA TORRE: Yes.

3 MR. WEEKS: In fact it's not just
4 the fixes, but I mean there is a whole software
5 migration process so that the software instance
6 moves from environment to environment to
7 environment.

8 When it's necessary to fix a
9 problem, it's fixed, it's tested and the code
10 base, whatever needs to be migrated is migrated
11 from environment to environment to environment.

12 MR. CONNOLLY: Which environment
13 serves as the master.

14 MR. WEEKS: And I believe we will --
15 unless one of my guys knows for sure.

16 Do you know for sure?

17 We believe it's the development
18 environment. I think Qwest can confirm that
19 for us.

20 MS. NOTARIANNI: This is Lynn
21 Notarianni. That is generally correct. But
22 again, it's going to depend on the phase of
23 development that you are in.

24 If you -- so yes, you have a
25 development environment. And you continue to

1 load releases there.

2 But it depends on, again, what phase
3 you are in. But that is traditionally where it
4 is.

5 MR. CONNOLLY: Mike, you said CTE.
6 Is that the same as SATE?

7 MR. WEEKS: I didn't say CTE.

8 MR. DELLA TORRE: I did. CTE is the
9 testing environment.

10 MS. ANDERSON: Stay with us.

11 MR. DELLA TORRE: I am sorry?

12 MR. CONNOLLY: CTE is the standalone
13 test environment?

14 MR. DELLA TORRE: That is an acronym
15 for the testing environment because interop and
16 SATE are really technically two different
17 environments. CTE is the overarching testing
18 arena.

19 MR. CONNOLLY: Thanks.

20 MR. DELLA TORRE: Question 37: In
21 the interviews conducted by KPMG Consulting
22 with the systems development staff, did Qwest's
23 systems development staff describe their
24 activities as consistent with the documented
25 practices, or did KPMG Consulting determine on

1 the basis of the interviews that the activities
2 as practiced are consistent with documented
3 practices?

4 (Pause.)

5 MR. DELLA TORRE: We did both
6 interviews and review of the documentation. In
7 fact the information we learned during the
8 interviews was consistent with our expectations
9 having established those from reviewing the
10 documentation.

11 MR. CONNOLLY: Our question arose
12 from the fourth paragraph in test
13 cross-reference 24.6-1-18 where you say KPMG
14 Consulting conducted on site interviews with
15 Qwest testing teams, developers, and managers
16 who described their activities to be consistent
17 with documented processes.

18 MR. DELLA TORRE: That is written
19 poorly and will be revised.

20 MR. CONNOLLY: Okay.

21 MR. WEEKS: Yes. I am sure they
22 represented that as well. It's probably a true
23 statement, but it's not what we intended to
24 say.

25 No, we don't do it that way.

1 (Laughter.)

2 MR. DELLA TORRE: Question 38: Is
3 it a documented Qwest policy that all CR
4 defects are remedied prior to implementation of
5 the system into production?

6 The answer is no. Not all of the
7 defects. I believe we went into this
8 discussion a little earlier based on the
9 severity levels 1 and 2 versus 3 and 4.

10 Also we can confirm there are
11 internal M&Ps for rating the internal CR
12 severities.

13 Question 39: It appears from KPMG
14 Consulting's comments that it could not observe
15 the triggering of alarms which affect the
16 process by which additional resources are
17 added.

18 Please confirm this understanding.

19 In the case that this is confirmed,
20 please explain why the test cross-reference is
21 shown as satisfied when no evaluation of the
22 execution of the process has been made.

23 And in fact, this should be -- it's
24 a statement of the process and the existence of
25 the process. We did not see the trigger go

1 off. We did see the fact that the process was
2 in place that the trigger would go off, should
3 those conditions be met.

4 So we will revise the report to
5 suggest a future existence based on the process
6 that we did observe.

7 Question 40: Is it KPMG
8 Consulting's understanding that the CRs that
9 are issued to initiate the process to add
10 capacity are controlled or administered within
11 the Qwest external CMP, i.e., the one which
12 involves CLECs.

13 Are the CRs of this type processed
14 within the internal Qwest CMP.

15 The answer to the first question is
16 no. This process does not relate to the Qwest
17 external wholesale CMP. And there is not, to
18 our understanding, there is not an internal
19 Qwest CMP. So that is not a concept that is
20 used.

21 There is an internal process for
22 initiating, approving, and cataloging CRs, but
23 that is not called an internal CMP process.

24 MR. WEEKS: Qwest doesn't label it
25 that way.

1 MR. CONNOLLY: Whatever it's called,
2 the CRs are processed through that, whatever
3 its called?

4 MR. WEEKS: Yes.

5 MR. CONNOLLY: Whenever they deal
6 with these capacity issues?

7 MR. WEEKS: Yes.

8 MR. DELLA TORRE: Question 41:
9 Please provide KPMG Consulting's understanding
10 of the extent to which users of EB-TA
11 interfaces set the entrance and exit criteria
12 for testing.

13 In fact the users of EB-TA and CEMR
14 interfaces do not set the internal entrance and
15 exit criteria for development testing.

16 These users are internal Qwest
17 developers and testers.

18 Question 42: Please provide KPMG
19 Consulting's understanding of the ways in which
20 the interface specification development and
21 updating responsibilities are related to the
22 processes that provide for publication of
23 notifications to the industry of changes to the
24 interface.

25 Changes to the MEDIACC EB-TA

1 business rules and supporting documents follow
2 procedures governed by the CMP.

3 We verified our understanding
4 through a review of Qwest internal M&Ps as well
5 as project plans.

6 MR. WEEKS: Do you have a question?

7 MR. CONNOLLY: I didn't know if Joe
8 was finished.

9 MR. WEEKS: I think he is.

10 MR. DELLA TORRE: Yes.

11 MR. CONNOLLY: Are notifications
12 such as these for maintenance and repair
13 interfaces, do those also conform to these
14 customer notification letters, communicators,
15 and so forth?

16 MR. WEEKS: Yes.

17 MR. DELLA TORRE: Question 43:
18 Please describe the evaluations conducted by
19 KPMG Consulting of the processes and procedures
20 that develops, updates -- that develops updates
21 to CEMR and EB-TA user guides to be consistent
22 with revisions to the interfaces.

23 In fact, MEDIACC EB-TA does not have
24 a user guide.

25 Our evaluations were based on

1 interviews with Qwest and reviews of internal
2 documentation.

3 Revisions to the CEMR user guide
4 followed the same process used to update IMA
5 GUI.

6 MR. CONNOLLY: So the process for
7 the CEMR, the CEMR systems development work and
8 the IMA systems development work are governed
9 by the same sorts of Qwest policies and
10 procedures?

11 MR. WEEKS: Similar processes, yes.

12 MR. DELLA TORRE: They are
13 identical. They are not identical, my
14 apologies. Similar functionality but not
15 identical. My apologies.

16 MR. CONNOLLY: So relative to the
17 updating of user guides and so forth, there are
18 procedural steps that are equivalent for IMA
19 GUI and for CEMR?

20 MR. DELLA TORRE: Correct.

21 44: KPMG Consulting reports CLEC
22 impacting changes to the CEMR interface
23 specifications are governed by the policies of
24 the Qwest wholesale CMP.

25 Did KPMG Consulting make any

1 observations where the wholesale CMP discussed
2 the CEMR interface change requests?

3 If yes, please provide the dates of
4 those CMP meetings.

5 CEMR were discussed at the August
6 15, 2001, and March 21, 2002 systems CMP
7 meetings. CR numbers were: SCR 073001-3 and
8 SCR 021302-1.

9 Question 45: KPMG Consulting states
10 in test cross-references within this section,
11 CLECs are not required to develop interface to
12 CEMR. Therefore, CEMR does not require a
13 carrier-to-carrier testing methodology.

14 Please confirm Qwest makes no
15 provision for testing environment for CEMR.

16 That is confirmed.

17 Question 46: KPMG Consultants cites
18 a client acceptance test plan in this
19 particular test cross-reference.

20 Please explain what is meant by a
21 "client."

22 Please explain any differences
23 between a client and a user of the EB-TA and/or
24 CEMR interface.

25 In this particular cross-reference

1 where I believe the focus is acceptance
2 testing, client and user are in fact the same
3 thing.

4 MR. WEEKS: Internally.

5 MR. DELLA TORRE: They are internal
6 to Qwest.

7 Moving on to WorldCom questions.
8 Question number 1: Were any test objectives in
9 place for the evaluation of Qwest's capacity
10 management and growth planning processes?

11 The answer is yes. The test
12 objectives are listed in the results table for
13 evaluation test criteria 24.6-1-21, 24.6-1-24,
14 24.6-2-21, and 24.6-2-24.

15 MR. WEEKS: Those are inclusive.

16 MR. DELLA TORRE: My apologies. 21
17 through 24 in both cases. Thank you.

18 Question 2: Did KPMG Consulting
19 conduct any transaction testing of SATE?

20 The answer is no.

21 Question 3: Provide an explanation
22 of controlled production and how it serves as a
23 factor in certifying the CLEC's interface.

24 Controlled production is a trial
25 production phase for IMA EDI where a limited

1 set of transactions are submitted and monitored
2 by a Qwest test systems engineer to ensure they
3 are successfully processed and provisioned by
4 Qwest IMA systems.

5 Controlled production is actually
6 defined and documented in the EDI
7 implementation guidelines for IMA which is on
8 the website.

9 MS. OLIVER: Becky Oliver. So
10 controlled production is only applicable to IMA
11 EDI?

12 MR. DELLA TORRE: That's correct.

13 Question 4: Did KPMG Consulting
14 observe any introductory meetings with CLECs to
15 discuss the EDI implementation process?

16 If so, what were the KPMG findings?

17 The answer is yes, we did. We would
18 refer you to the comments for evaluation
19 criteria 24.6-1-7.

20 Just as some follow-on detail for
21 that, the activities we observed at these
22 meetings involved the introduction of the
23 parties, discussions on establishing
24 connectivity, and transaction testing options.

25 MR. FINNEGAN: Joe, this is John

1 Finnegan with a follow-up. Were those
2 commercial CLECs or pseudo-CLECs?

3 MR. WEEKS: We actually saw the
4 initials stages on live CLECs.

5 MR. FINNEGAN: Are you at liberty to
6 discuss who they might be?

7 MR. WEEKS: No (inaudible).

8 (Laughter.)

9 MS. ANDERSON: Why would we change
10 that answer now?

11 MR. WEEKS: Nice try.

12 MR. DELLA TORRE: Question 5: What
13 types of IMA releases are non-major and,
14 therefore, not applied to both IMA, EDI and
15 GUI?

16 We are not aware of any releases
17 that would apply to either one or the other.

18 However, we would defer to Qwest for
19 further defer if, in fact, a release would
20 apply to one and not the other.

21 MS. NOTARIANNI: No, it applies to
22 both.

23 MR. WEEKS: Thank you.

24 MR. DELLE TORRE: Question 6: Do
25 CLECs have the option of including regression

1 testing scenarios in addition to new release
2 testing requirements when migrating to an EDI
3 release?

4 The answer is yes.

5 Question 7: Clarify what is the
6 progression testing phase and how are the
7 minimum testing requirements developed.

8 I think we have discussed that.

9 Thank you.

10 Question 8: When migrating to a new
11 EDI point release, is controlled production the
12 only step that is not required since
13 recertification is not required?

14 In fact, controlled production as
15 well as all of the other steps are not
16 required. None of the steps are required. For
17 a point release.

18 Question 9: During the defined
19 candidate step, does Qwest differentiate
20 requests/candidates between those that are
21 directly impacting to the CLEC interface and
22 those not directly impacting to the CLEC
23 interface.

24 The answer is yes.

25 Question 10: Following the

1 "Integration and System Testing" phase and once
2 the software is ready for deployment into the
3 CLEC testing environment, does Qwest cease or
4 continue its own testing efforts?

5 Qwest will continue its testing
6 efforts if there are errors that continue to
7 need to be address ed.

8 So it's really on a case-by-case
9 basis.

10 MR. WEEKS: If what you meant by
11 that, Becky, was do they continue to test on
12 their own in parallel with the other activities
13 going on, the answer is no, the testing is
14 done, once the 1s and 2s are out of it and it's
15 ready to go, then it's put out there. And if
16 there are problems found with that then
17 obviously it will cycle back into the system
18 (inaudible).

19 MR. DELLA TORRE: Question 11:
20 Clarify if the following statement found within
21 the CTE paragraph in 2.1.1.4 is a KPMG or Qwest
22 opinion determination.

23 The quote is, "Since CLECs do not
24 have to develop an interface with GUI a testing
25 environment is not a necessary component of the

1 software development life cycle."

2 That, in fact, is a KPMG statement.

3 Question 12: Did KPMG could be
4 serve any transaction testing by CLECs?

5 If so, which CLECs were observed?

6 The answer is no, we did not.

7 MS. OLIVER: Becky Oliver, WorldCom.

8 Follow up on question 11. I just
9 want a better understanding of the scope of
10 what has now been clarified as a KPMG
11 statement, that you are saying a testing
12 environment is not necessary.

13 Is that, does that relate directly
14 to KPMG's position regarding what qualifies as
15 an interface?

16 MR. DELLA TORRE: That is exactly
17 correct.

18 MS. OLIVER: So this statement
19 doesn't make any kind of, or doesn't relate to
20 the potential benefit that a testing
21 environment for a GUI would offer?

22 MR. DELLA TORRE: We do qualify the
23 sentence with the first half in saying that
24 since CLECs do not have to develop an interface
25 for GUI, that a testing environment is not a

1 necessary component of this software
2 development life cycle in the sense that there
3 is no software development needs on the part of
4 a -- so I do believe we are qualifying the
5 statement.

6 Are there other potential benefits
7 to a testing environment? Possibly.

8 But in this particular test which is
9 evaluating interface development and therefore
10 the subsequent testing environments, that was
11 the conclusion we reached.

12 MS. OLIVER: Thank you.

13 MR. DELLA TORRE: Question 13. How
14 is the scope of the addendum to the disclosure
15 document which is released two weeks after the
16 initial publication determined?

17 The scope of those addendums is
18 limited to the problems found during testing.

19 14. With the upcoming 6-17-02
20 changes which will make the initial disclosure
21 document available at 73 days prior to
22 implementation date, when will the addendum to
23 the disclosure document be provided?

24 The first addendum to the disclosure
25 document will continue to be provided to CLECs

1 two weeks after deployment, which is defined in
2 the master red lined CLEC Qwest CMP redesigned
3 framework document.

4 MR. WEEKS: The "Little Red Book."

5 MR. DELLA TORRE: Question 15. How
6 much in advance of a new IMA EDI release being
7 imply mend in SATE is the SATE data and VICKI
8 path documents provided to CLECs.

9 Advance notice provided to CLECs for
10 the SATE data document can be found in the
11 release notification issued publicly by Qwest
12 on April 22nd, 2002.

13 However, we are not aware of any
14 documentation indicating the release intervals
15 for the VICKI path documented VICKI.

16 MS. ANDERSON: I think Qwest wants
17 to --

18 MS. NOTARIANNI: That information is
19 in the EDI implementation guideline.

20 MR. DELLA TORRE: 16. How much in
21 advance of at the timing mugs the SATE advance
22 form be submitted to Qwest.

23 MS. OLIVER: Excuse me. I just want
24 to follow up on question 15.

25 This is--maybe the answer was

1 provided and I didn't understand it--but this
2 question is trying to get at (inaudible) for a
3 new release, an upcoming release that will be
4 implemented in the SATE, how much in advance of
5 that release being implemented in SATE --
6 strike that. I think I am jumping ahead to a
7 future question. I covered it later. Thank
8 you.

9 Question 16. Okay. The SATE data
10 request form and how much in advance that needs
11 to be submitted.

12 While there is no documented
13 requirement that the SATE data request form
14 must be submitted to Qwest in advance of the
15 testing, there is approximately a 15-day period
16 that will elapse from the date of the request
17 until the data is load nude SATE.

18 And, therefore, that 15-day
19 interval --

20 MR. WEEKS: In fact there is 15 days
21 of lead time is the answer to the question. So
22 there is a lead time requirement.

23 MR. DELLA TORRE: In fact, it's not
24 a requirement. You can submit the at any
25 point.

1 But if you want it in prior to the
2 migration of that, you need 15 days.

3 MS. OLIVER: Is that 15-day period
4 documented for CLECs somewhere?

5 MR. WEEKS: EDI implementation
6 guidelines talk about the process that one uses
7 to request this data.

8 I think 15 days are in that.

9 MS. OLIVER: Okay.

10 MR. DELLA TORRE: Yes, there are
11 time frames for approval identified in that
12 document.

13 Question 17. Did KPMG Consulting
14 test VICKI?

15 The answer is no, we did not.

16 We learned about VICKI sort of in a
17 roundabout way through exception 3077.

18 She was a nice gal, too.

19 Question 18: Did KPMG Consulting
20 observe the Qwest CLEC review process to
21 determine expected results?

22 If so --

23 MS. ANDERSON: You can tell it's
24 near the end.

25 MR. DELLA TORRE: If so, what were

1 KPMG Consulting's findings from these
2 observations?

3 (Inaudible comment.)

4 (Laughter.)

5 MS. ANDERSON: Was there a follow-up
6 question?

7 (Laughter.)

8 MR. DELLA TORRE: We did not
9 directly observe meetings of the review process
10 while Qwest and the CLECs were testing.

11 However, we did observe artifacts of
12 the review process, meaning documents that
13 included the expected results of the testing
14 and the like.

15 Question 19: Did the design
16 specifications for the MEDIACC EB-TA interface
17 as outlined in the JIA include any variations
18 to EB industry guidelines.

19 The answer is yes. And in fact,
20 Qwest provides variations to the industry
21 standards in the Qwest MEDIACC electronic
22 bonding trouble administration LMOS to ANSI
23 standard attribute mapping. .

24 Question 20. Does the CEMR user
25 guide provide the same type of information

1 contained in the IMA connection guide?

2 And the answer is yes.

3 Question 21: Are the access
4 requirements, including system and browser
5 specifications, the same for accessing the CEMR
6 as for IMA GUI?

7 And the access requirements are
8 similar but they are certainly not exactly the
9 same.

10 MS. OLIVER: Can you expand on what
11 the differences are?

12 MR. WEEKS: Fundamentally the same
13 technology in terms of Netscape, browser,
14 secure ID, and password and log-on. So in that
15 sense they are built on the same technologies
16 and have a similar look and feel. They are
17 just not identical. Same features and
18 functions.

19 Do we have an example after a
20 difference?

21 Different IT address, for example.

22 MS. OLIVER: But from, for a CLEC
23 user there is --

24 MR. WEEKS: It is conceptually the
25 same.

1 MS. OLIVER: Requirements are the
2 same for using CEMR --

3 MR. WEEKS: Yes.

4 MS. OLIVER: And IMA GUI.

5 MR. DELLA TORRE: This is a website.
6 So as any website is different from any other
7 website, but they are accessed the same way.

8 MR. WEEKS: The way you get access
9 to the website is the same in both cases, in
10 terms of the techniques you use and level of
11 security provided is the same, the details are
12 in the data, so to speak. Passwords would be
13 different, IP addresses would be different.
14 Same mechanisms.

15 MR. DELLA TORRE: Question 22: Is
16 the testing available to CLECs prior to launch
17 in production for the electronic receipt of
18 CRIS summary billing and DUF files.

19 The answer is no.

20 23: Confirm that for CLECs to
21 electronically receive CRIS summary billing and
22 DUF files that the CLEC must develop its end of
23 the electronic interface and verify it is set
24 up with Qwest.

25 That is correct.

1 MR. WEEKS: We have already
2 discussed this in some of AT&T's questions, so
3 it's follow-up?

4 MS. OLIVER: On the previous
5 question. Question 22.

6 MR. WEEKS: Okay.

7 MS. OLIVER: I want to make sure the
8 question is clear.

9 This is asking if Qwest would allow
10 an opportunity for the CLEC to go through, this
11 is verifying the connectivity piece of the
12 interface, to go through some type of testing
13 effort before actually turning up live --

14 MR. WEEKS: The answer is yes. That
15 was actually done in the, and the pseudo-CLEC
16 went through such a process and we observed him
17 go through the process. So yes, you can get a
18 trial run. The point is it's not a stand-alone
19 kind of test environment. You are really doing
20 it sort of live with real stuff. But you do
21 get a chance to walk through it in an orderly
22 fashion and in a controlled and monitored
23 fashion.

24 MS. OLIVER: Okay, that is what was
25 intended by question 22.

1 MR. DELLA TORRE: But that is
2 connectivity only. So the reason that we
3 answered no was it's not testing in the sense
4 that SATE and interop are testing. But simply
5 a confirmation of connectivity.

6 MR. WEEKS: It's a dry run in the
7 production environment.

8 MS. OLIVER: Thank you.

9 MR. DELLA TORRE: Question 24:
10 Beside testing process adherence using HPC's
11 interface implementation experience, was the
12 adequacy of those processes evaluated by KPMG
13 based on H-P's experience?

14 In fact H-P's experience were one
15 part of our evaluation process, but not the
16 only source of information.

17 In fact, we conducted interviews
18 with Qwest personnel, we reviewed Qwest
19 documentation, we interviewed a CLEC or CLECs.

20 MR. WOODHOUSE: Multiple CLECs.

21 MR. DELLA TORRE: Multiple CLEC
22 interviews, a single service provider, as well
23 as the PCI.

24 Question 25: Why did KPMG
25 Consulting conduct interviews with only a

1 single CLEC, CLEC service provider and P-CLEC?

2 In fact our report will be revised
3 to reflect it was multiple CLECs.

4 Question 26: Does the following --

5 MS. OLIVER: Do you have the number?

6 MR. DELLA TORRE: 3.

7 MR. WEEKS: 3.

8 MS. ANDERSON: And no, we won't
9 identify them.

10 (Laughter.)

11 MR. DELLA TORRE: Question 26: Does
12 the following statement about electronic
13 billing interfaces, once a CLEC has chosen the
14 data format, transport mechanism and connection
15 type -- actually this question was covered
16 earlier and we will be revising the report to
17 reflect the receipt of the test file.

18 Question 27: Clarify the following
19 statement about the electronic billing
20 interfaces: There is no software interface
21 development required for the CLEC that does not
22 include the CLEC software development which
23 would be required to translate and process the
24 electronic transmission of the billing data .

25 And that is correct.

1 In fact, we will add some clarifying
2 language to the report to indicate this point.

3 Question 28: In what documentation
4 is Qwest's RAD process for SATE documented?

5 And did KPMG review this
6 documentation?

7 Yes, we did review the
8 documentation. And the RAD process is defined
9 and documented in the IMA EDI standalone test
10 environment white paper which was published on
11 June 18th of 2001.

12 Question 29: Is the scope of
13 Qwest's Integration Testing equivalent to the
14 scope of a Regression Test?

15 This is where we were earlier.

16 Question 30: Specify if the
17 referenced system testing, integration testing
18 and user acceptance testing that is performed
19 in SATE is completed by CLECs or Qwest.

20 That is a Qwest internal testing.

21 Question 31: Is the testing process
22 completed by developers for new IMA GUI
23 releases equivalent to system and regression
24 testing processes.

25 The answer is no. The developer is

1 only involved in the unit testing phase.

2 Separate teams actually perform system and
3 integration testing for IMA GUI.

4 Question 32: Did KPMG Consulting
5 make an assessment of the impact to CLECs from
6 the limited support available for regression
7 testing?

8 In fact we discussed that earlier,
9 the nature of support during regression versus
10 progression testing.

11 Question 33: Did KPMG Consulting
12 evaluate effectiveness of and adherence to the
13 "SATE and IMA Synchronization" document for
14 ensuring the release loaded into SATE matches
15 what will be loaded into the production
16 environment?

17 And no, we did not specifically
18 evaluate that document.

19 MR. WEEKS: However, we did look at
20 other artifacts of the process, as evidenced by
21 the fact that it actually worked, as we
22 previously answered a AT&T question.

23 MR. DELLA TORRE: Question 34. How
24 does Qwest issue a general notification to
25 CLECs of a release's problem discovered during

1 testing?

2 And Qwest issues the system
3 notification in accordance with the established
4 CMP or change management process.

5 And in fact we will modify the
6 report from the "General Notification" to the
7 "Release Notification" to make that point more
8 clear.

9 Question 35. Does Qwest's
10 "Scalability Process Document" include tools
11 and measures for IMA GUI capacity issues
12 resulting from CLECs' access methods?

13 The answer is no.

14 Question 36: In addition to
15 verifying that the appropriate references to
16 industry guideline documentation are provided
17 in Qwest MEDIACC EB-TA documentation, did KPMG
18 verify that Qwest's documentation also provides
19 to CLECs any or all exceptions to those
20 industry guidelines?

21 The answer is no.

22 Question 37: Clarify how responses
23 received during MEDIACC EB-TA testing are
24 similar to responses that would be received in
25 production.

1 Specifically, how were the responses
2 dissimilar?

3 And they are dissimilar in the sense
4 that the actual trouble repair and
5 troubleshooting information would not be on the
6 response, because that activity doesn't
7 actually take place.

8 Other questions for report 24.6?

9 MR. WEEKS: Before you get excited,
10 we are not quite done.

11 MS. OLIVER: Becky Oliver, WorldCom.
12 One follow-up question on number 35.

13 Is there some other documentation
14 other than the scalability process document
15 that would describe any tools or measures that
16 would be in place to address IMA GUI capacity
17 issues?

18 MR. DELLA TORRE: It's our
19 understanding the tools and measures that are
20 identified in that document apply to both EDI
21 and GUI systems.

22 I don't think that there is a
23 specific document that identifies tools and
24 measures for GUI specifically.

25 We are not aware of any other

1 documentation that contains additional
2 information on tools employed around capacity,
3 CLEC access (Inaudible) --

4 MS. OLIVER: Would Qwest be able to
5 identify if that is contained anywhere?

6 MR. DELLA TORRE: I will read the
7 question once again so we are clear. Does
8 Qwest's scalability process document include
9 tools and measures for IMA GUI capacity issues
10 resulting from CLEC access methods?

11 MS. NOTARIANNI: This is Lynn
12 Notarianni. I don't think I would be able to
13 answer that, Becky.

14 We can go back and ask and see if
15 it's in somewhere else, but I am not aware that
16 it is.

17 MS. OLIVER: Okay.

18 MS. ANDERSON: Okay. I think we
19 have a couple items we need to discuss before
20 we break.

21 One, just want to verify the
22 follow-up questions. The only one I have
23 except for this most recent one that Qwest was
24 going to check on is the H-P evaluation
25 criteria.

1 I think based on discussions with
2 Liz and Geoff earlier during our break they are
3 going to write that up, send it out, have it
4 there by the next TAG meeting before that. So
5 if there is any question it can be discussed on
6 that TAG and I will add that to the TAG agenda.

7 Does anyone else have any other
8 follow-up questions?

9 I think you guys even answered all
10 yours on a rolling basis.

11 MR. WEEKS: Yes.

12 MS. ANDERSON: I am unaware of any
13 others.

14 MR. WEEKS: We are not aware of any.

15 MS. ANDERSON: Everyone agrees. How
16 novel.

17 (Laughter.)

18 The other topic, I thought we needed
19 to talk a little bit about John's issue. Is
20 that where you guys are going?

21 MR. WEEKS: Yes.

22 MS. ANDERSON: John brought up an
23 issue. Would you like to frame that for
24 discussion, John? This is the CLEC-to-CLEC.

25 MR. FINNEGAN: Sure. At the various

1 state proceedings that have been occurring on
2 Qwest's service quality performance results,
3 there has been reference to the analysis that
4 KPMG Consulting was to be conducting as part of
5 Test 12 and Test 14 to compare the KPMG
6 Consulting-produced pseudo-CLEC results to the
7 Qwest produced pseudo-CLEC results to see if
8 there are any unreasonable differences between
9 the two.

10 As far as I can tell, the two
11 references to that analysis in the draft final
12 report occur in the single evaluation criteria
13 for both Test 12 and Test 14, that
14 Qwest-produced measures of pre-order/order
15 performance results for HPC transactions are
16 consistent with KPMG Consulting-produced HPC
17 measures.

18 At this point results are not
19 complete and it might even be unsatisfied on
20 Test 14.

21 My concern is, if you review the
22 master test plan in Section 12.6.3, which is
23 the output section, number 13, there is a
24 required output of KPMG Consulting-produced H-P
25 data to Qwest H-P data comparison.

1 In section 14.6.3 also outputs for
2 Test 14.

3 In number 7 is the same requirement
4 of output of KPMG Consulting-produced H-P date
5 the to Qwest H-P performance result data
6 comparison.

7 The question is, or I guess the
8 expectation was, as the data were presented in
9 Section V, there would be a column, so to
10 speak, that has what the Qwest results were for
11 the pseudo-CLECs so we can compare for the same
12 time period what the KPMG produced pseudo-CLEC
13 results were.

14 The concern was that is not there.
15 The question was can it be put there, or was
16 there some document or supplemental document
17 that can produce that output?

18 MR. WEEKS: The answer to your
19 question, John, is that we had done the work
20 which is evidenced by the criteria there. You
21 are correct that that requirement is in the MTP
22 and we acknowledge that requirement is in the
23 MTP . It is not in Table 5. It should be in
24 some way, shape or form.

25 Let me describe for you what we are

1 prepared and able to do with the information
2 that we have and that is available to us.

3 The information that is presented
4 now in 5, every column has a set of values.
5 Those values were obtained or cover a
6 particular period time. I will make up
7 something to illustrate the conversation.

8 Let's say there is a particular PID
9 measure that the data is from January 15th to
10 March 7th.

11 So because there was an original
12 test and the results for the original test,
13 then we have retest results, and because the
14 averages for those two may be different if it's
15 an average or the value may be different if
16 it's a value, we have presented in Table 5 the
17 values that are there, and there are dates that
18 you don't see visible in 5 that correspond to
19 the start and end date of that data.

20 So if there are 427, it's a count or
21 something, and an average of 96.3 or something,
22 there are very specific data we collected on
23 our side and that were reported.

24 What we have from Qwest are reports
25 that were provided to us that represent months

1 of time.

2 So our proposal is to add columns to
3 the, conceptually at least to add columns to
4 Table 5 that communicate the time periods that
5 are relevant to the data we present for the
6 pseudo-CLEC so people can see what the span of
7 time is and to put as many columns as necessary
8 to reflect the months for which data that is
9 relevant that has been reported to us by Qwest.

10 What we do not have are
11 representations by Qwest for the exact start
12 and stop times that correspond to our start and
13 stop times. All we have are the monthly
14 reports that we have gotten from Qwest.

15 So there is going to be a little bit
16 of sort of apples to apples potentially here
17 the where we maybe started in the middle of a
18 month and ended in the middle of a month and
19 maybe spent multiple months for the purposes of
20 our data.

21 So it's going to be a little bit
22 difficult to compare, but we will provide the
23 raw data that we have. Our data and the period
24 of time our data covers and the months reported
25 on a month-by-month basis for the company and

1 then parties can see what they see out of that.

2 MR. FINNEGAN: If I understand Roman
3 numeral V data, it's the data that caused Qwest
4 to get the pass.

5 That may be based on just a retest
6 which would be a subtest of the entire universe
7 or if they pass the first time around it could
8 be the entire universe of data.

9 MR. WEEKS: Correct.

10 MR. FINNEGAN: Is it possible KPMG
11 could produce the entire universe of data for
12 the particular measures?

13 So in other words, you could sum up
14 every data point for P05 and compare it to the
15 Qwest produced results of every data point.

16 MR. WEEKS: It is mechanically
17 possible to do that. We would argue that it's
18 somewhat misleading, potentially, or
19 meaningless.

20 Let's use hypothetical numbers here
21 and say there were 2,000 transactions involved
22 in the original test and a thousand in the
23 retest. You would get a denominator that is
24 3,000 there. You would get an average that,
25 and you could compare averages to averages,

1 that is mechanically possible to do.

2 It wouldn't, in many cases,
3 correspond to our results. And we wouldn't
4 ascribe any meaning to that.

5 MR. FINNEGAN: Well, I understand
6 that. But the purpose of the comparison would
7 not be to see on either an absolute level the
8 benchmarks or kind of an absolute level for
9 parity standards whether they pass or fail.

10 It's just when you add up all the
11 transactions, the count, whatever that count
12 is, for KPMG data, does it look like the count
13 for Qwest data.

14 So it wouldn't be to say Qwest
15 passed or failed based on this average. It
16 would say over the life of the test did the
17 average that KPMG counted look like the same
18 average that Qwest counted.

19 So it would be a relative comparison
20 of the data just to see if the numbers add up,
21 ascribing no import to the actual value of the
22 numbers.

23 MR. WEEKS: I am going to let Bob
24 talk about the difficulties of implementing
25 your suggestion.

1 MR. FALCONE: I think it can be
2 done, John. And we can go back -- we have all
3 the data. I am still not sure what you would
4 do with it. Let me give you an instance.

5 We know there is an outstanding
6 exception we are in the retest mode now for
7 invalid exclusions.

8 If we did that, our data is going to
9 be greater than Qwest's, because we know Qwest
10 had a problem excluding things they shouldn't
11 have been excluding, we filed an exception on
12 that.

13 So when you get to the OP3, OP4, OP6
14 numbers, you are going to see the numbers
15 aren't going to match.

16 And you know, it will be there. But
17 I am not really sure what that data is going to
18 provide you.

19 MR. WEEKS: We don't have the Qwest
20 data accumulated the way you are describing.
21 We have Qwest data month by month by month. We
22 would have to cause Qwest to go back and
23 produce this report that would aggregate their
24 information for us.

25 MR. FINNEGAN: That's just summing

1 the numerators and denominators across the
2 months. It's certainly going to take some
3 effort to get it, but --

4 MR. WEEKS: I understand but because
5 of problems like we were talking about, I think
6 Qwest would argue if they had an inaccurate
7 report for January, which we have discovered,
8 they wouldn't want to stand on the numerators
9 and denominators reported in January that we --
10 physically we have access to.

11 MR. FALCONE: If I can give another
12 example, we had an issue earlier on in the test
13 with the interactive agent where what we were
14 measuring was time stamps and what Qwest had
15 were two different numbers.

16 There was discussion around that,
17 exception filed. H-P changed their interactive
18 agent.

19 So if we accumulate all that data
20 you are going to find that our response times
21 are going to be much greater than Qwest's. But
22 that is the purpose of the military-style test.
23 Something failed, we recognized it failed. In
24 this case, if you will, the failure was, if you
25 want to call it failure was more a problem on

1 our part, on the way things were working on our
2 part, but the fact of the matter is the data
3 still have those time stamps, KPMG data still
4 has those time stamps. So our average times
5 will be much greater than Qwest's.

6 Again, we could put that in a
7 report, but I'm not really sure what we're
8 going to -- we would have to footnote every
9 single thing in that report.

10 MR. FINNEGAN: Well, I don't think
11 it will get to the level of footnoting every
12 single thing in the report.

13 The examples you brought up, if I
14 understand the analysis, would represent more
15 so, maybe this is a bad word, exception rather
16 than the rule.

17 MR. DELLA TORRE: The interactive
18 agent, actually, I think, impacted everything.

19 MR. WEEKS: Every transaction for
20 the period.

21 MR. DELLA TORRE: All transactions.

22 MR. FINNEGAN: On --

23 MR. FALCONE: It impacted all
24 transactions that were -- P01, P03, certainly.
25 We had exceptions out for P05 or FOC

1 timeliness, that were corrected that we
2 retested. Those would be in there.

3 I mean, again, off the top of my
4 head I can't rattle off all the exceptions we
5 had on PIDs, but there were quite a few that
6 were subjected to retest, certainly OP3 and 4,
7 PO3, PO1. I believe there was a PO4 in there.

8 We will give you the data. But each
9 one of those is going to have to have a
10 footnote saying refer to exception such and
11 such for the correction and retest started on
12 whatever date it restarted.

13 But I truly think you are looking at
14 apples and oranges.

15 MS. ANDERSON: This is Denise. I
16 wouldn't want to get in a situation where we
17 are putting out data that we know is going to
18 automatically have to be looked at on every
19 case in a forum like this, going through
20 another 2,000 questions on something that we
21 know is not going to jive to begin with.

22 I mean, that is just a thought from
23 me. I can't speak for the steering committee
24 but that would be a concern of mine, based on
25 what I am hearing.

1 MR. FINNEGAN: Then let's look at it
2 another way.

3 At some point where the measures
4 KPMG Consulting included they are close enough,
5 that the KPMG-produced pseudo-CLEC results were
6 close enough to the Qwest-produced pseudo-CLEC
7 results.

8 MR. DELLA TORRE: For some of the
9 PIDs, that's correct.

10 MR. FINNEGAN: And subject to the
11 ones that are still being looked at in
12 exception 3120.

13 MR. DELLA TORRE: Which I think is
14 OP3, 4 and 6.

15 MR. FINNEGAN: But at some point
16 KPMG Consulting concluded that these are close
17 enough.

18 I am presuming, correct me if I am
19 wrong, that you had a subset of Qwest data and
20 a subset of KPMG data, both for the
21 pseudo-CLEC, that caused you to reach that
22 conclusion.

23 MR. WEEKS: And I would like to,
24 just humor me here with some definitions, I
25 would rather refer to the average for a month

1 as a result, not data. I think that data, I
2 mean 2,412 transactions, that is the raw data
3 that is the subject of 3120 and I distinguish
4 that from the results which are the average for
5 the month of July was 9 97.6, And so what we
6 are talking about is comparing results to
7 results, not data to data.

8 MR. FINNEGAN: When I use the term
9 data, what I mean is the aggregate numerator,
10 the aggregate denominator --

11 MR. WEEKS: Are talking about the
12 value for the numerator and the value for the
13 denominator?

14 MR. FINNEGAN: Yes. End results.

15 MR. WEEKS: Right. But not each of
16 the individual transactions themselves?

17 MR. FINNEGAN: No.

18 MR. WEEKS: Okay, then we are in
19 sync with each other on that.

20 MR. FINNEGAN: So, at some point
21 KPMG looked at numerator and denominator
22 results or data, for its view of the two, and
23 compared it to Qwest's view of presumably the
24 same, or close to the same set of transactions,
25 for the same or close to the same period of

1 time and came to the conclusion it's close
2 enough, there is no unreasonable differences.

3 MR. WEEKS: I think that is mostly a
4 characterization of what we did. I think what
5 is in there is an assumption, and the part we
6 are struggling with -- there are two things we
7 struggle with.

8 One is that if you start with sat or
9 not sat and you back up to the information that
10 supports the sat or the not sat, then it's
11 either the retest because the original test
12 failed, or it's the original test because the
13 original test passed.

14 And because the time frame for that
15 body of data isn't -- doesn't start on the
16 beginning of a month and end on the end of the
17 month, the best we can do for you is, and we
18 think it would be meaningful to sit and say you
19 know, the data that we are giving the sat or
20 not sat for starts on this date ends on this
21 date, and the Qwest reported data for the
22 months in question is this data and that data
23 and we think that is as close as we can get to
24 a meaningful comparison.

25 Anything that begins to combine

1 invalid or inappropriate or exception-based
2 data with quote-unquote clean data, we begin to
3 be uncomfortable with because we think it's
4 meaningless.

5 MR. FINNEGAN: That I understand.
6 And I think ultimately we want to get somewhere
7 in between producing everything and one box on
8 a chart.

9 But I don't want to be in a position
10 of trying to guess how you came to your
11 conclusions if you just sort of throw out here
12 is what we found and here's somewhere in the
13 range of what Qwest was reporting, so that we
14 have got to guess --

15 MR. WEEKS: It wouldn't be a guess.
16 We have no problem, and my original proposal to
17 you is that we say that you know the -- here
18 was, here was sort of the values for what we
19 said and here are the values reported by Qwest
20 in the months in question. Because there is
21 not a clean overlap from a calendar perspective
22 between the end of a test which failed and
23 start of a retest that ultimately succeeded, I
24 don't know how to get around that other than to
25 provide Qwest with the start and stop dates

1 that caused them to produce those reports for
2 the same time periods. So there really would
3 be an apples and apples comparison.

4 MR. FALCONE: Even that wouldn't
5 work, because the PID retest for example for
6 OP3, 4 and 6 started in January. At the same
7 time we were doing the PID retests we had other
8 resale UNE-P transactions going on not
9 associated with the PID retest but were within
10 that functionality. So we used those
11 transactions to test the functionality.

12 Qwest in their results would count
13 them toward their OP3, OP4, OP6 PID. We did
14 not because we were in a PID retest. We had a
15 unique set of PONs we used specifically for --
16 this gets very complicated. To break it out
17 and get it exact is not an easy task.

18 MR. DELLA TORRE: We won't attempt
19 to make the numbers exact. We can present the
20 numbers for you but they will be very far
21 apart.

22 The ability for us to give you the
23 meaning for why those numbers are far apart
24 will be a very, very large task.

25 MR. FINNEGAN: I know --

1 MS. LUBAMERSKY: A few points. The
2 design of the MTP was the way KPMG performed
3 the test and today to be asking about full
4 month or partial month or matching up data is
5 inappropriate, too late, and we are not
6 interested in that data.

7 KPMG has put forward their process,
8 and I think providing the dates of the analysis
9 time frame would be fine, that would be an
10 additional input to the table.

11 But for all of the points described
12 by the three KPMG experts, I am quite surprised
13 at this continued request. And it's not one
14 Qwest supports.

15 MR. FINNEGAN: What I am trying to
16 get at, I am not trying to have you make work.
17 You came to your conclusions based on a
18 relative comparison of KPMG-produced data to
19 Qwest-produced data.

20 MR. FALCONE: No. We did not.
21 Maybe that is where we are falling off the
22 wagon here.

23 We came to our conclusions of pass,
24 satisfied, not satisfied based upon
25 KPMG-produced data period.

1 MS. ANDERSON: That is true.

2 MR. FINNEGAN: When I pay pass,
3 there is pass for did you meet the benchmark.

4 MR. FALCONE: Yes.

5 MR. FINNEGAN: There is pass for was
6 there discrimination or non-discrimination.
7 There was also an evaluation criteria of are
8 the data consistent.

9 You are going to reach a sat not sat
10 based on a comparison of the KPMG produced
11 pseudo-CLEC data to the Qwest produced
12 pseudo-CLEC data. I understand the overlap
13 issues, but somehow you are going to reach that
14 conclusion and my assumption is that somehow
15 has to involve comparing a set of KPMG data to
16 a set of Qwest data.

17 MR. WEEKS: And the data we are
18 talking about here is a different set of data
19 than the data -- what you defined (inaudible) a
20 moment ago. We were looking at values for
21 individual transactions compared to values for
22 individual transactions for the evaluation
23 criteria you just talked about.

24 Up the next level which is comparing
25 numerators and denominators is not the basis

1 for that in there. So the disconnect here is
2 what is meant by data.

3 When we mean the data compares to
4 the data, we are really talking about time
5 stamp information for individual transactions
6 matches time stamp information for individual
7 transactions. Not that the numerator and
8 denominator on their report agrees with the
9 numerator and denominator on our report.

10 MR. DELLA TORRE: We would note
11 things like app date where we specifically
12 noted our app date was March 1 for a specific
13 LSR and Qwest'S was March 2nd and we saw that
14 as a conflict that could not be explained when
15 we compared the two data sets.

16 MR. FALCONE: It was not 7,000 LSRs
17 here and 8,000 LSRs over there. What is
18 confusing here a little bit, John, is we did
19 that comparison. There were I believe, subject
20 to check, three observations in an exception
21 written saying we are not matching and we are
22 in a retest mode right now. Allen is back at
23 the ranch, he's not here right now, because
24 he's back at the ranch getting the data set to
25 see what the result of that retest is.

1 Qwest may or may not pass that
2 retest. That remains to be seen. So I am not
3 sure where this whole thing is going. We found
4 problems when we tried to match our data to
5 their data. In the Western Region they were
6 putting accounts in the MCN issue, if I am
7 getting that one right, the acronym but they
8 were putting them in the retail bucket instead
9 of the wholesale bucket.

10 We had time stamp issues, we had
11 exclusion issues, we had time of day exclusion
12 issues, we had weekend issues and all that is
13 documented.

14 So if we produce this, all we are
15 going to say is here are the data we used and
16 it didn't match Qwest's.

17 MR. FINNEGAN: Maybe one of the
18 assumptions that I was making that is turning
19 out to be incorrect is, for the purpose of the
20 consistency check you were not calculating PID
21 results, you were looking at order information.

22 MR. WEEKS: Data.

23 MR. FINNEGAN: We sent it on this
24 day, we got the FOC on that day, we got the SOC
25 on this day, completion date on the SOC --

1 MR. WEEKS: Right. Is the
2 information they are recording in their OSSs
3 consistent with the information we reported on
4 our side, that you and I were talking about
5 earlier, where if you look at the normal PID
6 production process on the company side, they
7 log real-world events into their OSSs, then
8 they have -- extract sort and print stuff that
9 is part of their PID reporting process.

10 The Liberty process kind of can go
11 as far as the OSSs and say yes if it's right in
12 the OSSs it's right from there, on. And what
13 this data reconciliation activity is getting at
14 is -- is the data they reported in their OSSs
15 accurate and consistent with the data we
16 reported in our OSSs so to speak. That is the
17 mechanism we were doing.

18 MR. DELLA TORRE: In fact the
19 activities and outputs you cite do reference
20 the data, not the results.

21 MR. FINNEGAN: Apart from the time
22 stamp type of data there is also conditions
23 that may exist for an order that, under Qwest's
24 systems, may cause it to be excluded.

25 MR. WEEKS: That is what Liberty

1 looked at, as did we.

2 MR. FINNEGAN: Liberty looked at it
3 to say that this field has a CO in the first
4 two digits of the miscode, it should be
5 excluded because it's a customer code mix.

6 If there was a CO there they would
7 expect that order to be excluded. They had no
8 visibility as to whether there should be a CO
9 there in the first place.

10 MR. WEEKS: That is why we are
11 looking at data to data rather than high level
12 results to high level results.

13 MR. FINNEGAN: That is my question.
14 Are you looking at more than the time stamp
15 information?

16 MR. WEEKS: The answer is yes. I
17 was using that as an example.

18 MR. DELLA TORRE: The exception or
19 observation, I don't recall which, there were
20 at least four problems that were identified and
21 retested at one level or another. One was app
22 date. Time of day, 3 p.m. versus 7 p.m. there
23 was improper exclusion of orders.

24 The categorization of I believe it
25 was a migration or disconnect, whether the

1 disconnect order was being counted as retail
2 and subsequent order being counted in wholesale
3 appropriately or not.

4 Therefore, orders were being
5 excluded that shouldn't have been excluded. In
6 fact that was one of the issues we identified
7 in the exception.

8 So we did assess, kind of at that
9 level, whether or not orders were there not.
10 But it was from the data analysis, not the
11 overall number, because of the all the
12 exceptions we have pointed out that include the
13 calendar, but that also included a variety of
14 other transactions we were sending, and
15 problems identified earlier on in the test that
16 would cause the aggregate numbers. Everybody
17 knows the aggregate numbers would be different.

18 MR. FINNEGAN: What was the scope of
19 services that was investigated?

20 MR. WEEKS: On the data
21 reconciliation?

22 MR. FINNEGAN: Yes.

23 MR. FALCONE: When they say
24 service -- it was the RSOR data and what we
25 looked at was the pseudo-CLEC, just pseudo-CLEC

1 (inaudible), no commercial activity.

2 The PO and OP PIDs. It was all the
3 products in there. Specifically UNE loop,
4 resales, UNE-P to get specific. Those products
5 and the -- I encourage you, John, to look at
6 exception 3120 because it's like 22 pages long
7 and kind of gives a whole history of some of
8 the things we found in that data comparison.

9 What was used was Qwest's RSOR data,
10 the raw data and said this is the data Qwest is
11 using to calculate this PID and here is the
12 data KPMG is using. Gee, how come we have
13 orders in here they don't have, because they
14 were probably excluding things.

15 Or gee, how come we have dates here
16 that are different than the dates they have?
17 Because they had an application date problem.
18 And again, the rest of it is all documented in
19 3120. Prior to that there were two
20 observations that got rolled into 3120 to make
21 the record complete.

22 MR. FINNEGAN: Now I understand that
23 a little better about what you did, can you
24 indulge me again and --

25 MS. ANDERSON: Briefly.

1 (Laughter.)

2 MR. FINNEGAN: -- briefly state how
3 you are going to discharge the obligation of
4 those output comparisons?

5 MR. WEEKS: What I understood from
6 our previous conversation was that it would --
7 I understood our obligation as -- I thought you
8 were explaining it to me to be sort of
9 communicating, what did Qwest report as results
10 for the pseudo-CLEC and how do those results
11 compare and contrast to the calculation of
12 values a la section 5.

13 So my proposal was to drop the Qwest
14 reported values, because those are missing
15 right now. They aren't in the tables. You
16 can't see what Qwest told us, they reported for
17 us or for pseudo-CLEC during that time period.

18 My proposal was if we were working
19 at that level, we said the average was 96.7,
20 they said 97.2, you would see that sort of
21 stuff and we would put the time frames on our
22 data so you could see what months were relevant
23 and we dropped the relevant months. So that is
24 results to results.

25 That is how I was going to fulfill

1 my obligation that you pointed out to me in
2 13.13. I am not disputing it, it's there.

3 The evaluation criteria you pointed
4 out which is the data jives with the data, that
5 is way too voluminous to put into a report.
6 That's thousands of things.

7 It's in our work papers. If you
8 have a need and desire to come crawl through
9 those CDs and look at our work papers and how
10 we did our comparison of the results so you can
11 be happy that you understand that that was done
12 well and done diligently, you know you know you
13 already have that right.

14 MR. FINNEGAN: I am tracking with
15 you on discharging the obligation. That sounds
16 reasonable.

17 In terms of slogging through the
18 CDs, I have no interest in that.

19 MR. WEEKS: All right.

20 MR. FINNEGAN: But what I would have
21 an interest in is looking at the Qwest produced
22 reports for the P-CLECs.

23 MR. WEEKS: We have those in our
24 work papers.

25 MR. FINNEGAN: Is that considered

1 confidential?

2 MR. WEEKS: I think it's
3 confidential, but it's covered under the
4 confidentiality agreements that we already
5 have.

6 MS. ANDERSON: You can access
7 because you executed the agreement.

8 MR. WEEKS: So, you can come look at
9 the raw data we analyzed and the reports Qwest
10 provided to us. All that -- you already have
11 the right to come and examine under previous
12 agreements so we are cool with you doing that.
13 We would encourage you to do that.

14 MS. ANDERSON: Okay. So what I hear
15 coming out of this dialogue is you will drop
16 the Qwest reported information into Section 5
17 with the data brackets and if John wants to
18 look at the additional detail of the
19 pseudo-CLEC reported data, in all its glory, he
20 will go to the work papers.

21 MR. WEEKS: We will make it
22 available, yes.

23 MR. FALCONE: I just want to make
24 sure, because for the uneducated reader and
25 somebody who is not in this room listening to

1 this discussion, just dropping that data in
2 there I want to stress is extremely dangerous.
3 They are not going to match.

4 So we will do that, but I can
5 guaranteeing you there is going to be footnotes
6 to the best we can, because we didn't audit.
7 It wasn't our job to audit this and slop over
8 of information in each of the months -- so we
9 will put all the footnotes trying to explain
10 why there may be differences, why the Qwest
11 January data may have more information than our
12 January data, because our test started in the
13 middle of January and we only started counting
14 PONs from that point on.

15 I just want to let everyone know
16 that to somebody who picks it up and says gee,
17 why is there a 10 percent difference here, we
18 need to do our best to explain why those
19 differences exist.

20 MR. FINNEGAN: I think that we will
21 understand but hopefully to close out the
22 discussion and make sure we know what we mean
23 when we say data it will be identification of
24 the period under investigation for KPMG and my
25 hope is the data will include numerator,

1 denominator and result.

2 MR. WEEKS: As long as we have that.
3 Do we have that?

4 MR. FALCONE: We have our numerator,
5 denominator and result, I can't give you
6 Qwest's because it only reported the result.
7 With the numerator and denominator for the
8 month. But it's not the same numerator and --

9 MR. FINNEGAN: I understand. But if
10 you put in the -- we can go back and do the
11 math. We can add up the months and
12 understanding it's not going to be an exact
13 match, there is going to be some overlap.

14 But if it's four months of Qwest
15 data I can go in and add up four numerators,
16 four denominators and calculate the four-month
17 result. I know it's not going to march
18 timewise.

19 MR. DELLA TORRE: I would like to
20 make it very clear that we will, it will be
21 very unlikely that we will get this done as
22 requested given the current schedule for
23 releasing the final report.

24 MS. LUBAMERSKY: Why does AT&T get
25 to ask KPMG to put something in a report that

1 clearly Bob Falcone is saying is full of
2 footnotes.

3 I would suggest KPMG create the
4 table the way KPMG believes it should, no other
5 way and certainly not introducing a level of
6 doubt with absolute known overlap and
7 inconsistency of date time frames in the Qwest
8 data. That is not good business.

9 MS. ANDERSON: Well, if I am
10 understanding this discussion correctly, there
11 is an obligation in the MTP for some piece of
12 this. That piece of it is what you are saying
13 we might have trouble getting into the final or
14 is it the additional piece?

15 MR. DELLA TORRE: No. I think the
16 issue is we will be able to drop in numbers
17 given the current schedule and fulfill the
18 obligation.

19 We --

20 MS. ANDERSON: Section 12?

21 MR. DELLA TORRE: Correct.

22 What will be very unlikely is for us
23 to be able to explain the differences so that
24 everyone else can understand why the numbers
25 don't agree in the given time period.

1 So we can put the numbers this
2 there. Then folks will see 1,000 for Qwest,
3 800 for KPMG. We can leave that alone and just
4 drop the numbers in there. We fulfill our
5 obligation and we will complete that by next
6 Tuesday. Or a week from Tuesday.

7 MS. LUBAMERSKY: We don't think that
8 is your obligation.

9 MR. DELLA TORRE: However to put in,
10 to footnote why everything is different, it
11 will be a more time-consuming task.

12 MS. ANDERSON: Nancy, you are saying
13 you don't think that it is an obligation
14 according to the MTP?

15 MS. LUBAMERSKY: For the Qwest
16 information, because it was not gathered the
17 way to compare numerator and denominators.
18 Unless we want to only put in the retest data
19 only. Then in many cases that is a month.

20 MR. DELLA TORRE: I actually think
21 that a very strict reading of the outputs
22 refers to data, not results.

23 MR. FINNEGAN: Let me go back to the
24 activity in 12.6.2, Activity 19. Compare KPMG
25 Consulting produced H-P measures to Qwest

1 produced H-P measures to insure that there is
2 no problem for the data being collected for
3 test reporting purposes.

4 MR. DELLA TORRE: That was done.

5 MS. ANDERSON: That was done.

6 MR. DELLA TORRE: That is the
7 evaluation that led to the exception.

8 MR. FINNEGAN: In response to
9 Nancy's point, measures looks more PID-like --

10 MR. DELLA TORRE: It's to ensure
11 there is no problem --

12 MS. ANDERSON: Could I make a
13 suggestion?

14 MR. DELLA TORRE: We have done what
15 we have done, by the way. So either way, what
16 we did, the way we read this activity and the
17 way we would subsequently read the related
18 output requirements is data.

19 We have discussed that this is the
20 RSOR data which is extremely voluminous and
21 available in the work papers for anyone who
22 would like to come and see it. So I think our
23 obligations, in fact, have been fulfilled
24 already. However, Mike appears would be
25 willing to discuss results.

1 I am just saying the explanation of
2 the discrepancies in those results is a task
3 that would need some time to complete.

4 MS. ANDERSON: I am going to step in
5 here and strongly suggest that we -- you go
6 away and look at 3120. We will talk to the
7 steering committee on Monday. I will schedule
8 a call for Tuesday. You guys can think
9 whatever you need to think about. And we will
10 have a call Tuesday and get this settled once
11 and for all as to exactly what we will be
12 asking KPMG to do, if anything.

13 That will give everyone a chance to
14 look at their positions, look at what is in
15 3120 because that is a pretty comprehensive
16 document. We've been through that several
17 times already. And that will give the steering
18 committee a chance on Monday at their meeting
19 to kick this around, having had the benefit of
20 this dialogue.

21 I will go ahead just as I did
22 yesterday, we have a call now for Monday
23 morning on 3108. I can go ahead and schedule a
24 call for Tuesday morning on this topic.

25 Is there any objection to that?

1 MR. DELLA TORRE: Actually, yes. I
2 would like to say one other thing.

3 I think that the -- what is required
4 of us is the comparison. And all of our
5 results and all of our criteria are summations
6 of volumes of data. We are presenting the
7 underlying data in the work papers, as we do
8 with every other evaluation criteria that we
9 draw conclusions upon.

10 We have done, we have completed this
11 comparison, the results of which have come out
12 in both exception 3120 and the two evaluation
13 criteria in the report.

14 I believe the data comparison has
15 been done and reported on. The underlying data
16 that allowed us to draw those conclusions is
17 also contained in the work papers. That is
18 completely consistent with every other output
19 and every other criteria in the test.

20 I think it would be unusual, in
21 fact, for us to produce the source data for how
22 we drew our conclusions in the final report.

23 MS. ANDERSON: Okay. Back to my
24 original question. Do you have any -- yes?
25 Wayne?

1 MR. HART: I have a conflict with
2 Tuesday. Is there a chance we can do it Monday
3 afternoon?

4 MS. ANDERSON: Yes. 1 o'clock
5 Mountain?

6 MR. HART: Fine.

7 MS. ANDERSON: We will proceed on
8 that basis.

9 You look like you have a question.

10 MR. CONNOLLY: Are we going to get
11 to the next set of questions?

12 MS. ANDERSON: The next set of
13 questions? There are no more.

14 MR. CONNOLLY: I disagree. We
15 provide a question on Test 18.

16 MS. ANDERSON: And if there are, we
17 may not get to them.

18 I am sorry. What are the questions?

19 MR. CONNOLLY: You, we provided some
20 questions on Test 18, page 19 of 41 of our
21 questions for VTC nummber 3. It's three
22 questions that deal with trouble on hot cut
23 provisioning.

24 MS. ANDERSON: Maybe somehow we --

25 MR. CONNOLLY: Page 19 of 41.

1 MR. WEEKS: We don't have those.

2 MS. ANDERSON: 18? 18 we already
3 covered. On VTC 2.

4 Oh, I see.

5 MR. WEEKS: Is this a follow-up
6 question on VTC 2?

7 MS. ANDERSON: So there is one
8 question?

9 MR. CONNOLLY: One numbered question
10 that contains three separate ones.

11 MS. ANDERSON: If KPMG takes a look
12 at it and can answer on the fly, then fine.
13 Otherwise, we will do it on the next TAG call.
14 Is that agreeable, Tim?

15 MR. CONNOLLY: Yes.

16 MR. WEEKS: Is there a reference to
17 this or are you just asking a general question?

18 MR. CONNOLLY: There is no specific
19 statement within the Test 18 report that goes
20 to this. It's a process question.

21 (Pause.)

22 MS. ANDERSON: KPMG wants to check,
23 so we will do it on the TAG. I will put that,
24 the last three questions on the TAG.

25 MS. TRIBBY: May I have the

1 questions back?

2 MR. WEEKS: Is there anything good
3 in there?

4 (Laughter.)

5 MS. ANDERSON: Okay. Well, thanks
6 for keeping it lively.

7 I do think we have reached the end
8 of VTC number 3 and we only have that one
9 little question dangling out there.

10 A couple things. First of all, much
11 thanks to the vendor teams for getting all
12 these questions in from folks, putting them
13 together, being prepared to go through them in
14 a pretty snappy order and pace. So we
15 recognize how much work that is and really
16 appreciate all of the efforts.

17 (Applause.)

18 MS. ANDERSON: We need to practice
19 clapping for tonight.

20 So for that, thank you.

21 Secondly, for Marie --

22 MS. LUBAMERSKY: We can go off the
23 record I think.

24 (Discussion off the record.)

25 MS. ANDERSON: Another thank you to

1 Marie for arranging everything.

2 (Applause.)

3 (Whereupon the proceedings of ROC

4 OSS 271 VTC number 3 were concluded at 5:06

5 p.m.)

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