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**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

Docket No. UT-003022

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

Docket No. UT-003040

**QWEST'S REPLY TO AT&T'S RESPONSE  
TO QWEST'S SUMMARY OF CLOSED/  
UNRESOLVED OBSERVATIONS AND  
EXCEPTIONS IN THE ROC OSS TEST**

Qwest respectfully submits this reply to AT&T's response (AT&T's "Response") to Qwest's Summary of Closed/Unresolved Observations and Exceptions in the ROC OSS Test (Qwest's "Summary"), which Qwest submitted to inform the Commission and the parties of the Observations and Exceptions that were closed/unresolved during the Regional Oversight Committee ("ROC") test of Qwest's Operations Support Systems ("OSS").

**I INTRODUCTION**

During testing, the vendors issued a total of 242 Observations and 256 Exceptions. Qwest made numerous process and systems changes to resolve the vast majority of these Observations and Exceptions. At the conclusion of testing, all but one Observation and only ten Exceptions were closed in

1 a resolved status.<sup>1/</sup> Qwest addressed these closed/unresolved Observations and Exceptions in its  
2 Summary and a companion pleading. AT&T addressed some of those Exceptions in its Response and in  
3 its Update Regarding O & Es for CMP and Remarks regarding PO-16 concerning CMP, dated May 20,  
4 2002 (AT&T's "Update"). Qwest responds to AT&T's comments in its Response and Update here.

5 As discussed below, AT&T has not raised any issue regarding these Exceptions that alters the  
6 fact that the status of these Exceptions should not affect the Commission's ability to conclude that Qwest's  
7 OSS satisfies the requirements of Section 271(c)(2)(B)(ii).

8 **II. None of the Closed/Unresolved Observations and Exceptions Prevent this Commission**  
9 **from Finding that Qwest's OSS Complies with Section 271**

10 As Qwest noted in its Summary, concluding the ROC OSS test with only a few  
11 closed/unresolved Observations and Exceptions (out of a total of nearly 500) is consistent with the FCC's  
12 overall requirements for demonstrating compliance with Section 271 and FCC precedent.

13 The ROC OSS Test (like other independent OSS tests) was designed to demonstrate that  
14 Qwest's OSS is "operationally ready, as a practical matter."<sup>2/</sup> However, the OSS test is not the only  
15 way – or, according to the FCC, even the best way – to demonstrate operational readiness. The FCC  
16 has held that "[t]he most probative evidence that OSS functions are operationally ready is actual  
17 commercial usage."<sup>3/</sup> Only absent sufficient data on commercial usage does the FCC next consider "the  
18 results of carrier-to-carrier testing, independent third-party testing, and internal testing."<sup>4/</sup> Moreover, in  
19 assessing OSS commercial performance, the FCC repeatedly has held that it looks at the "totality of  
20 circumstances" and that "individual performance disparities . . . [are not] dispositive of whether a BOC  
21 has satisfied its checklist obligations."<sup>5/</sup>

22 \_\_\_\_\_  
23 <sup>1/</sup> Additionally, in connection with retesting, only two Observations remain open, but Qwest expects each to close  
on May 28, 2002.

24 <sup>2/</sup> See *Application by Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long  
Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and  
Verizon Select Services Inc., for Authorization To Provide In-Region, InterLATA Services in Vermont, Memorandum  
Opinion and Order*, CC Docket No. 02-7, FCC 02-118 (Apr. 17, 2002) ("Vermont 271 Order") at App. D (¶ 29).

25 <sup>3/</sup> *Id.* at App. D (¶ 31).

26 <sup>4/</sup> *Id.*

<sup>5/</sup> See, e.g., *Vermont 271 Order* at App. D (¶ 31).

1 As shown below, the issues addressed in several of the closed/unresolved Exceptions discussed  
2 here are obviated by Qwest's commercial performance results. For those closed/unresolved Exceptions  
3 for which analogous commercial performance results are not available, there is additional evidence that  
4 Qwest's OSS are operationally ready or otherwise satisfy the requirements of Section 271.

5 The ROC test was the most comprehensive and collaborative third party test of a BOC's OSS.  
6 KPMG evaluated a total of 545 test points with defined success criteria.<sup>6/</sup> Qwest successfully satisfied  
7 the vast majority of these test points and KPMG found only nine not satisfied at the test's conclusion.

8 The closed/unresolved Exceptions, grouped by test number, and AT&T's responses are  
9 described below. Qwest also addresses two closed/inconclusive Exceptions issued in conjunction with  
10 Test 23, Change Management. As shown below, these Exceptions do not provide a sufficient basis for  
11 this Commission to find that Qwest has not satisfied OSS-related Section 271 requirements.

12 **A. Test 12 – POP Functionality and Performance**

13 Test 12 resulted in two closed/unresolved Exceptions, E3061 and E3086, neither of which affects  
14 a finding that Qwest provisions service to CLECs in a timely, non-discriminatory manner.

15 **1. Exception 3061**

16 In its Summary, Qwest explained that E3061 pertained to Qwest's issuance of Firm Order  
17 Confirmation ("FOCs"), which are the notices Qwest returns to CLECs to confirm that CLEC Local  
18 Service Requests ("LSRs") have been received and that an appropriate service order, with an associated  
19 due date, has been set. E3061 was issued because Qwest did not meet the PO-5B<sup>7/</sup> standard for one  
20 of the several Resale products that are included in that performance measure.<sup>8/</sup> The ROC TAG defined  
21 PO-5B to include Resale PBX orders as well as other types of Resale orders. E3061 resulted only when  
22 KPMG extracted only one type of Resale orders – Resale PBX orders – from those included in this  
23 measure, and evaluated it separately.

24 \_\_\_\_\_  
25 <sup>6/</sup> An additional 27 test points were assessed under a "diagnostic" standard.

26 <sup>7/</sup> Qwest, Service Performance Indicator Definitions (PID), ROC 271 Working PID Version 4.0 (Oct. 22, 2001) ("ROC PIDs") at 15-16.

<sup>8/</sup> See Disposition Report for E3061, available at [www.nrri.ohio-state.edu/oss/master/exceptions/mar/e3061disposition\\_report.pdf](http://www.nrri.ohio-state.edu/oss/master/exceptions/mar/e3061disposition_report.pdf).

1 Qwest noted that it had in fact met PO-5B for Resale orders during the test.<sup>9/</sup> Nonetheless, by  
2 conducting this narrow analysis, KPMG focused on the *only* product for which Qwest did not meet the  
3 90% standard during the test was Resale PBX orders. A one-time processing error that resulted in the  
4 initial test performance was corrected,<sup>10/</sup> and the retest results showed that Qwest missed the benchmark  
5 by a single order. These results indicate that there is no systemic problem with Resale PBX FOCs.  
6 Qwest's commercial performance in Washington supports this conclusion. Specifically, the commercial  
7 data show that Qwest has exceeded the PO-5B benchmark in Washington with respect to Resale orders  
8 (which include Resale PBX orders) in each of the past ten months.<sup>11/</sup>

9 In its Response, AT&T adds no new analysis. Instead, it simply argues that the Commission  
10 should ignore the Washington commercial results – and, by implication, the FCC's clear mandate that  
11 commercial results comprise "[t]he most probative evidence" in the OSS test context – as well as the  
12 TAG's definition of PO-5B. Qwest's success rate in the commercial setting – and the primacy of  
13 commercial performance data in the FCC's analysis – establish that there is no reason to conclude that the  
14 closed/unresolved finding in connection with E3061 is significant. AT&T has raised nothing to indicate  
15 otherwise.

## 16 2. Exception 3086

17 E3086 was issued because Qwest did not meet PID OP-4C for non-dispatch Business POTS in  
18 its Eastern Region or for non-dispatch UNE-P in all three regions – Western, Central and Eastern –  
19 during the test.<sup>12/</sup> AT&T's Response addresses only the results for non-dispatch UNE-P.

20 \_\_\_\_\_  
21 <sup>9/</sup> See generally *Qwest Communications OSS Evaluation, Draft Final Report, Version 1.0* (Apr. 19 2002) ("*Draft  
Final Report*") at 81-87.

22 <sup>10/</sup> Specifically, the 11 LSRs for which FOCs were not returned in the initial test were routed to the incorrect work  
23 group for processing. As a result – and because of the complex nature of PBX LSRs – the Qwest Interconnect Service  
24 Centers ("ISCs") failed to return FOCs for those 11 LSRs within the specified 48 hour interval. Qwest identified this  
issue at the end of July 2001, and implemented a daily call starting August 6, 2001, with the ISCs to prevent this  
problem from recurring. During the daily call, the ISCs analyze all routing situations and use that data to train ISC  
personnel on the proper routing of requests. Re-routing now is not permitted until a coach has been contacted to  
validate that the proposed routing is appropriate and accurate.

25 <sup>11/</sup> To view Qwest's performance in each state under PO-5B, see <http://www.qwest.com/wholesale/results/roc.html>.

26 <sup>12/</sup> See Disposition Report for E3086, available at [www.nrri.ohio-state.edu/oss/master/exceptions/april/  
e3086disposition\\_report.pdf](http://www.nrri.ohio-state.edu/oss/master/exceptions/april/e3086disposition_report.pdf). Qwest's Eastern Region includes Iowa, Minnesota, North Dakota, Nebraska and South  
Dakota.

1 In its response, AT&T again adds nothing new. Instead, AT&T simply urges the Commission to  
2 use this single performance disparity to conclude that Qwest has failed to demonstrate compliance with  
3 checklist item 2. Such a result would contravene the FCC's consistent holding that "individual  
4 performance disparities . . . [are not] dispositive of whether a BOC has satisfied its checklist  
5 obligations."<sup>13/</sup> As set forth below, Qwest's non-dispatch UNE-P performance does not compel a  
6 finding of noncompliance with checklist item 2.

7 The FCC employs a practical approach: it overlooks earlier performance discrepancies when a  
8 BOC's most recent performance is satisfactory.<sup>14/</sup> This is just such a case. As Qwest explained in its  
9 Summary, while Qwest did not achieve parity for non-dispatch UNE-P in three of the past five months,  
10 Qwest's actual commercial performance has steadily improved, with Qwest achieving parity in the two  
11 most recent months, March and April. Thus, Qwest's non-dispatch UNE-P performance does not  
12 preclude this Commission from finding that Qwest has satisfied the section 271 criteria.

13 **B. Test 16 – CEMR Functional and Performance Evaluation**

14 Test 16 resulted in one closed/unresolved Exception, E3107, which was issued because Qwest  
15 did not process one of 13 transaction types – non-design edit transactions – that were submitted to the  
16 Customer Electronic Maintenance and Repair ("CEMR") interface in the timeframe required during the  
17 Volume Peak Test.<sup>15/</sup>

18 As Qwest explained in its Summary, the substantial evidence that CEMR can support existing and  
19 reasonably foreseeable demand for transactions should be dispositive, despite E3107's closed/unresolved  
20 status.

21 Overall, Qwest's performance at the normal volume, peak volume and stress volume levels in  
22 Test 16's capacity test of the CEMR interface was excellent. Qwest successfully met all of the

23 \_\_\_\_\_  
<sup>13/</sup> See, e.g., *Vermont 271 Order* at App. D (¶ 31).

24 <sup>14/</sup> See, e.g., *Application of Verizon New England Inc., et al., for Authorization to Provide In-Region, InterLATA*  
25 *Services in Massachusetts*, CC Docket 01-9, *Memorandum Opinion and Order*, 16 FCC Rcd 8988 ("Massachusetts 271  
26 *Order*") (2001) at 9038, n.291.

<sup>15/</sup> See Disposition Report for E3107, available at [www.nrri.ohio-state.edu/oss/master/exceptions/feb/e3107/disposition\\_report.pdf](http://www.nrri.ohio-state.edu/oss/master/exceptions/feb/e3107/disposition_report.pdf).

1 benchmarks for the 13 CEMR functionalities KPMG tested during the normal volume test, and met all of  
2 the benchmarks for 12 of the 13 functionalities KPMG tested during the peak volume test. <sup>16/</sup> However,  
3 E3107 was issued because Qwest missed the benchmark for just one functionality – non-design edit  
4 transactions – by three seconds during the peak volume test. Qwest noted that its CEMR Logs for the  
5 most recent six month period indicates that non-design edit transactions account for a mere 0.3%, on  
6 average, of actual CLEC transaction volumes.

7 In addition, Qwest independently conducted three separate tests that replicated KPMG's test of  
8 non-design edits, but involving even higher transaction volumes. In these tests, Qwest successfully met  
9 KPMG's 24 second benchmark during each of these tests, posting average transaction response times of  
10 18.9, 18.1, and 22.4 seconds. <sup>17/</sup> The extremely low commercial volume of this transaction, coupled with  
11 the results of Qwest's test, indicate that E3107 presents an anomaly that has no bearing on Qwest's  
12 CEMR capabilities.

13 In response, AT&T first chides Qwest for questioning the significance of the non-design edits  
14 transaction. Again, AT&T urges the Commission to ignore the context in which a negative result  
15 occurred, rather than consider the individual circumstances. Here, Qwest did not question the inclusion of  
16 the transaction in the test, as AT&T implies. Rather, Qwest pointed to the fact that this transaction type  
17 comprises only a fraction of a percent of commercial CEMR transaction volumes. As noted above, the  
18 FCC has consistently held that commercial data is not only appropriate evidence, but also is the most  
19 probative evidence this Commission can consider. The extremely low commercial volume provides just  
20 such evidence.

21 AT&T cavalierly suggests that Qwest could have and should have requested that KPMG perform  
22 a retest. However, Qwest is not required to request retests on every benchmark, and given the relatively  
23 small magnitude of this issue, Qwest does not believe that retesting would necessarily have produced  
24 additional useful information. This conclusion is bolstered by the results of Qwest's own internal tests.

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<sup>16/</sup> See *id.* at 2. The stress test was “diagnostic.”

26 <sup>17/</sup> See Disposition Report for E3107 at 1.

1 AT&T next cautions the Commission to be "suspicious" of Qwest's test results. There is no need  
2 for any apprehension regarding Qwest's test results. Indeed, the FCC specifically identifies internal test  
3 results as the kind of evidence it will consider.<sup>18/</sup> Coupled with the extremely low commercial  
4 occurrence of the non-design edits transaction, these test results provide compelling evidence that the  
5 closed/unresolved status of E3107 should not prevent this Commission from concluding that Qwest has  
6 met the section 271 criteria.

7 **C. Test 18 – End-to-End Trouble Report Processing**

8 Test 18 resulted in two closed/unresolved Exceptions, E3055 and E3058, neither of which affects  
9 a finding that Qwest provides maintenance and repair services to CLECs in a non-discriminatory manner.  
10 In its Response, AT&T addresses only E3055.

11 As Qwest explained in its Summary, E3055 was issued because KPMG found that Qwest used  
12 inaccurate close-out codes for POTS Resale and UNE-P orders.<sup>19/</sup> On retest, Qwest ultimately entered  
13 correct closeout codes for 108 of 122 (88.5%) of "dispatch in" and "dispatch out" HP accounts.  
14 Although the TAG did not set a PID for closeout code accuracy, Qwest's performance fell short of the  
15 95% standard KPMG imposed.

16 Because there is no PID, Qwest cannot provide commercial performance results to trump test  
17 results. However, as Qwest explained in its Summary, if KPMG had evaluated the narrative fields in  
18 closing out trouble tickets – which are used by the Qwest technician, screener or dispatcher to further  
19 describe the trouble – rather than rely solely on the coding number, it would have found that, as a  
20 practical matter, 116 of the 122 HP accounts (95.08%) it evaluated satisfied real CLECs' needs.  
21 Nonetheless, Qwest implemented additional training of its technicians, in addition to an internal audit  
22 process, to ensure that all trouble tickets are coded correctly. Weekly audits of Washington data since  
23 February 1, 2002, show that data is being coded accurately 97-99% of the time.

24 In its Response, AT&T suggests that Qwest refused to take corrective actions regarding the issue

25 \_\_\_\_\_  
<sup>18/</sup> Vermont 271 Order at App. D (¶ 31).

26 <sup>19/</sup> See Disposition Report for E3055, available at [www.nrri.ohio-state.edu/oss/master/exceptions/feb/e3055disposition\\_report.pdf](http://www.nrri.ohio-state.edu/oss/master/exceptions/feb/e3055disposition_report.pdf).

1 raise in E3055. AT&T is mistaken. As noted above, Qwest has responded to this Exception by  
2 implementing additional technician training and an internal audit process to ensure that trouble tickets are  
3 correctly coded.

4 Finally, AT&T urges the Commission to generalize the E3055 results to question the reliability of  
5 all of Qwest's maintenance and repair results. No such broad application of these specific results is  
6 appropriate. The context in which E3055 arose and Qwest's responsive actions indicate that the issues  
7 raised in this closed/unresolved Exception do not prevent CLECs from having a meaningful opportunity to  
8 compete.

9 **D. Test 23 – Change Management**

10 Test 23 resulted in one closed/unresolved Exception – E3094 – and two closed/inconclusive  
11 Exceptions – E3110 and E3111.

12 As an initial matter, AT&T erroneously states that KPMG has performed "absolutely no  
13 observation of any compliance whatsoever" of these Exceptions. As set forth below, KPMG has  
14 observed Qwest's compliance with its CMP with regarding to the issues raised in each of these three  
15 Exceptions.

16 In its Update, AT&T notes that KPMG conducted limited retesting regarding Exceptions 3094  
17 and 3110 at Qwest's requests. AT&T urges the Commission to wait for the results of KPMG's retesting  
18 before making any decisions regarding CMP. KPMG's retesting is complete, as discussed below.

19 **1. Exception 3094**

20 Exception 3094 resulted from an initial interim process for product/process changes that Qwest  
21 and CLECs developed during the early redesign sessions. That uncertainty has been resolved by the  
22 redesign team's completed agreement on a detailed process for product/process changes. Qwest has  
23 fully implemented the agreed-upon process.<sup>20</sup> However, KPMG was unwilling to close this Exception in  
24 a resolved status because it was unable to evaluate the new process in practice.

25 \_\_\_\_\_  
26 <sup>20</sup> The process for Qwest-initiated product/process changes is set forth in section 5.4 of Qwest's Wholesale Change Management Document, which can be found on the "What is CMP?" page of Qwest's wholesale web site at [www.Qwest.com/wholesale/CMP/whatiscmp.html](http://www.Qwest.com/wholesale/CMP/whatiscmp.html).



1 Because final agreement regarding this process was reached on April 16, 2002, Qwest requested  
2 that KPMG conducted limited retesting to observe the redesigned process. KPMG did so. KPMG  
3 observed that Qwest complied with the redesigned process in issuing all five of the product/process  
4 notices KPMG observed after April 16, 2002. Nonetheless, KPMG refused to close this Exception in a  
5 resolved status because of the "relatively few notifications issued since April 16, 2002 under the new  
6 process."<sup>21</sup> KPMG also cited the redesign team's continuing discussions regarding the process for  
7 postponing a product/process change, claiming that this process is relevant to this Exception. KPMG  
8 again recommended that this Exception be closed in an unresolved status.

9 KPMG's retest established that Qwest adhered to its redesigned process during the period  
10 KPMG observed. However, adherence to this process is not required because the FCC has not  
11 required a BOC to establish a process for managing product/process changes. KPMG's reliance on the  
12 postponement process Qwest has agreed to implement removes its analysis even further from the FCC  
13 requirements. No other BOC has implemented a process similar to the product/process postponement  
14 process, which allows CLECs to postpone Qwest's implementation of product/process changes.  
15 Because both the product/process provisions of Qwest's CMP and the postponement process to which  
16 KPMG refers far exceed the FCC's CMP criteria, these issues do not affect Qwest's compliance with the  
17 FCC's section 271 criteria for change management.

## 18 2. Exception 3110

19 In Exception 3110, KPMG expressed concern that Qwest's CMP managers do not employ a  
20 centralized mechanism to track and ensure that documentation release intervals are followed for upcoming  
21 software releases. KPMG reviewed Qwest's internal process documents and verified that software and  
22 product/process documentation teams have procedures to prepare documents and distribute them in  
23 accordance with the intervals specified in the redesigned process. KPMG was thus satisfied that Qwest  
24 had implemented procedures to ensure that it complies with its release notification intervals. However,

25 \_\_\_\_\_  
26 <sup>21</sup> See Disposition Report for E3094, available at [www.nrri.ohio-state.edu/oss/master/exceptions/may/e3094supplemental\\_disposition\\_report.pdf](http://www.nrri.ohio-state.edu/oss/master/exceptions/may/e3094supplemental_disposition_report.pdf)

1 because KPMG had not observed adherence to the documented process for notification interval  
2 management, KPMG recommended that Exception 3110 be closed as inconclusive.

3 As with Exception 3094, Qwest requested that KPMG conduct limited retesting to observe the  
4 redesigned process. KPMG observed eight release notifications between April 4, 2002 and May 3,  
5 2002. Qwest complied with its process in each instance. Nonetheless, KPMG again determined that it  
6 was unable to conclusively verify Qwest's consistent adherence to the stated CMP intervals and  
7 recommended that this E3110 be closed in an inconclusive status. In addition, KPMG expressed  
8 concern regarding the number of changes Qwest made to its OSS Release Calendar, noting that Qwest  
9 issued ten versions of the calendar in the five-month period from January through May 2002.<sup>22</sup>

10 KPMG's concern regarding Qwest's updates to its OSS Release Calendar is puzzling. Section  
11 6.0 of Qwest's Wholesale CMP provides that Qwest will provide a rolling 12-month OSS Release  
12 Calendar with specified information. Qwest must post the calendar on its web site, and provide it on a  
13 quarterly basis to the CLECs that receive the CMP monthly meeting materials. It would be inconsistent  
14 with the purpose of this calendar for Qwest not to update the calendar. Qwest believes it has  
15 appropriately updated the calendar to provide CLECs with appropriate notice regarding upcoming  
16 releases.

17 As with E3094, KPMG's retest established that Qwest adhered to its redesigned process during  
18 the period KPMG observed. In fact, Qwest has complied with 100% of the OSS interface release  
19 documentation interval notification deadlines that have occurred thus far. This is consistent with Qwest's  
20 overall 98% compliance rate on its CMP obligations. Qwest's record of compliance, coupled with its  
21 success in adhering to the very notification intervals that are the subject of the Exception, demonstrate that  
22 Qwest's tracking and verification procedures are adequate.

### 23 3. Exception 3111

24 There has been no change to the status of this Exception, which relates to Qwest's process for

25 \_\_\_\_\_  
26 <sup>22</sup> See Disposition Report for E3110, available at [www.nrri.ohio-state.edu/oss/master/exceptions/may/e3110supplemental\\_disposition\\_report.pdf](http://www.nrri.ohio-state.edu/oss/master/exceptions/may/e3110supplemental_disposition_report.pdf)

1 prioritizing and packaging change requests (CRs) for major IMA releases. KPMG observed the  
2 prioritizing and packaging process for IMA Releases 10.0 and 11.0. However, because it observed  
3 portions of the processes for each release, KPMG believed that Qwest did not comply with the CMP  
4 processes for three specific reasons: Regulatory Changes were not prioritized for IMA Release 10.0,  
5 Qwest did not provide CLECs with total capacity information prior to the prioritization votes on IMA  
6 10.0, and that Qwest did not participate in the prioritization process for IMA 10.0. In its responses to  
7 this Exception, Qwest addressed all three of these issues.

8 Nonetheless, because KPMG had not observed Qwest's adherence to the complete end-to-end  
9 prioritization and packaging process for a single major system release, KPMG recommended that this  
10 Exception be closed as inconclusive. As more fully discussed in Qwest Corporation's Response Joint  
11 CLEC Brief regarding Change Management Process, KPMG has already observed Qwest's adherence  
12 to each phase of the prioritization and packaging processes for major system releases that were in place  
13 and agreed to via CMP at the time of executing the process. These observations demonstrated Qwest's  
14 compliance with the process. No further showing is necessary.

15 **E. Test 24 – Technical Assistance**

16 Test 24 resulted in three closed/unresolved Exceptions: E3077, E3095, and E3109. In its  
17 Response, AT&T simply restates KPMG's statements regarding these Exceptions, without adding any  
18 additional information or analysis. AT&T also ignores the information Qwest provided in its April 30,  
19 2002 submission of Qwest Corporation's Comments Demonstrating Satisfaction of the FCC's Section  
20 271 Change Management Evaluation Criteria (Qwest's "CMP Compliance Filing"). Qwest addresses  
21 each of KPMG's concerns below.

22 **1. Exception 3077**

23 During its initial review of SATE (stand alone test environment), KPMG issued Exception 3077,  
24 identifying the following issues:

- 25 • SATE does not generate post-order responses in the same manner in which they  
26 are created in the production environment.

- 1                   •       Flow-through orders are not supported in SATE.
- 2                   •       The volume of order responses supported in SATE is restricted due to manual
- 3                   response handling.
- 4                   •       The data contained within the order responses is not consistent, and may not
- 5                   mirror the data that would be found in production responses.

6                   Qwest addresses each of KPMG's initial concerns in light of the disposition report it issued on  
7                   April 15, 2002, when it closed the exception.<sup>23</sup>

8                   The first KPMG concern was that "SATE does not generate post-order responses in the same  
9                   manner in which they are created in the production environment." <sup>24</sup> KPMG agreed that VICKI (Virtual  
10                   Interconnect Center Knowledge Initiator) appears to have enhanced some aspects of EDI interface  
11                   testing.<sup>25</sup> However, KPMG believed that VICKI had the following limitations:

- 12                   •       VICKI response times may not match production response times.
- 13                   •       VICKI response detail may not match production response detail.
- 14                   •       VICKI does not support "real world scenario testing."

15                   As KPMG acknowledged in its Disposition Report, the first and second items have been  
16                   addressed by April 15, 2002 modifications to VICKI supporting documentation.<sup>26</sup> The third KPMG  
17                   concern noted above is that, in its view, SATE does not provide "real world scenario testing."<sup>27</sup>

18                   KPMG's concerns about "real world scenario testing" should be largely addressed by Qwest's  
19                   implementation of flow-through capability in SATE. It is important to note, at the outset, that the FCC  
20                   has not required that test environments have flow-through capability under Section 271.<sup>28</sup> In any case,

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22                   <sup>23</sup> See KPMG Disposition Report for Exception 3077, issued April 15, 2002 ("E3077 Disposition Report"), available at  
[www.nrri.ohio-state.edu/oss/master/exceptions/april/e3077disposition\\_report.pdf](http://www.nrri.ohio-state.edu/oss/master/exceptions/april/e3077disposition_report.pdf)

23                   <sup>24</sup> E3077 Disposition Report at 1.

24                   <sup>25</sup> E3077 Disposition Report at 3; KPMG Second Supplemental Recommendation on E3077 (April 3, 2002) at 13.

25                   <sup>26</sup> E3077 Disposition Report at 2.

25                   <sup>27</sup> E3077 Disposition Report at 3.

26                   <sup>28</sup> See *Texas 271 Order*, ¶ 138.

1 flow-through capability has been fully implemented throughout Qwest's region. With flow-through, when  
2 a CLEC sends an LSR request to Qwest, the CLEC is asking what would happen to this specific LSR if  
3 the telephone numbers, circuits, and facilities in SATE existed in Qwest's production environment and this  
4 specific LSR were sent to production. Flow-through allows CLECs to test the exact message they would  
5 receive in production for an LSR. VICKI also allows CLECs to test message formats, messages, and  
6 maps for specific pre-determined test scenarios. To the extent VICKI is different from the production  
7 environment, this is an intended aspect of SATE's design.<sup>29</sup> VICKI allows CLECs to test specific  
8 desired responses to ensure that the CLEC can correctly process the Qwest response.<sup>30</sup>

9 Qwest believes that it has provided real world testing scenarios for CLECs through the  
10 introduction of SATE and its flow through capability. As noted above, the FCC does not require that the  
11 testing environment be "identical" to the production environment, but only that it provide "the same key  
12 functions."<sup>31</sup> Qwest's SATE clearly does.

13 A second KPMG concern is that "[f]low-through orders are not supported in SATE."<sup>32</sup> As  
14 discussed above, Qwest has enhanced SATE to add a test flow-through system and test Service Order  
15 Processors ("SOPs"). The option to send the test LSR to the flow-through systems allows the CLEC to  
16 experience an immediate response once the flow-through order is successfully processed, or to receive a

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18 <sup>29</sup> See E3077 Disposition Report at 2. See also Qwest Response to KPMG's Second Supplemental Recommendation  
19 on E3077 (April 8, 2002). There, in response to KPMG's assertion that "VICKI response detail may not match  
20 production response detail," Qwest undertook to clarify the discussion of this issue in the VICKI Path Document  
21 (attached as Exhibit U to Qwest's CMP Compliance Filing). Qwest has added the following language to the VICKI Path  
22 Document:

23 Due to the complexities of certain responses, the detail data on these transactions may not match the  
24 detail received on a production response for a similar transaction. The structure of the EDI response  
25 will mirror production. FOCs are provided with varying quantities of service orders. Also, with  
26 respect to the Service and Equipment detail of a Completion notice, VICKI is built to allow a CLEC to  
understand the EDI Map structure and content of a Completion. It does not return a Service and  
Equipment section specific to the CLEC's test LSR. If a CLEC desires a specific detail data in the  
Service and Equipment section to be returned, they can request it be added to VICKI via the Data  
Request Process.

<sup>30</sup> When desired responses are triggered by the CLEC for a specific LSR, the responses received may not be the  
same responses as those a similar production LSR would have received. This is purposeful and allows the CLEC to  
determine if it can process the response through their EDI system.

<sup>31</sup> *Texas 271 Order*, ¶ 138.

<sup>32</sup> E3077 Disposition Report at 3.

1 manual response if flow-through is not successful. As discussed above, flow-through implementation is  
2 complete. Because of the future implementation timeline of flow-through for additional products in other  
3 regions, however, KPMG closed this issue unresolved.<sup>33</sup> Qwest has now satisfactorily implemented  
4 flow-through as planned.<sup>34</sup>

5 A third KPMG concern was that the "volume of order responses supported in SATE is restricted  
6 due to manual response handling."<sup>35</sup> KPMG noted that limitations appeared to stem from the manual  
7 response generation required for SATE, and that with the implementation of VICKI, the resource  
8 requirements necessary to support SATE transactions were diminished. It therefore considered this  
9 aspect of E3077 to be resolved.<sup>36</sup>

10 The fourth KPMG concern was that the "data contained within the order responses is not  
11 consistent, and may not mirror the data that would be found in production responses."<sup>37</sup> Qwest explained  
12 in its response to this exception that it documents all known differences between IMA and SATE in the  
13 Overview section of the SATE Data Document.<sup>38</sup> SATE contains all IMA-EDI generated errors that  
14 occur in production, as well as commonly triggered legacy system errors. Through the data request  
15 process, a CLEC can request that Qwest code any other legacy system errors into SATE. Additionally,  
16 Qwest has compared the errors generated from the legacy systems returned through Qwest's 8.0  
17 production EDI interface over a 6-month period with the errors contained in SATE. Qwest has  
18 published this list and discussed it in the CMP forum.<sup>39</sup> Beginning with IMA-EDI release 9.0, Qwest  
19 generated the IMA EDI Errors List twice per IMA-EDI release – with the initial availability of the new

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21 <sup>33</sup> See E3077 Disposition Report at 3.

22 <sup>34</sup> In the case of Southwestern Bell, the FCC concluded, based on the "totality of the evidence," that its testing  
23 environment was adequate, even though SWBT did not test flow-through or response times, and did not evaluate the  
24 ability of an order to post to billing. *Texas 271 Order*, ¶¶ 138.

25 <sup>35</sup> E3077 Disposition Report at 3.

26 <sup>36</sup> E3077 Disposition Report at 4.

<sup>37</sup> *Id.*

<sup>38</sup> Qwest Response to KPMG Second Supplemental *Recommendation* on E3077 at 16.

<sup>39</sup> See <http://www.qwest.com/wholesale/cmp>.

1 release and the deployment of that release in production. This showing is adequate under Section 271.  
2 The FCC does not require a BOC to provide a testing environment that is "identical to its production  
3 environment."<sup>40</sup> Rather, it is sufficient for a BOC to show that "the testing and production environments  
4 perform the same key functions."<sup>41</sup>

5 The commercial data presented in Qwest's CMP Compliance Filing also strongly support the  
6 adequacy of SATE. The CLECs' experience during testing need not be flawless under Section 271. As  
7 the FCC concluded in approving Southwestern Bell's Section 271 application in Texas, while some  
8 problems arose during testing, they "did not significantly impede any carrier's ability to test adequately the  
9 release prior to implementation."<sup>42</sup> Similarly, any issues identified by KPMG do not "significantly impede  
10 any carrier's ability to test" under SATE.

11 In sum, given the commercial evidence Qwest has presented, which shows that CLECs have  
12 successfully used SATE, and given the limited nature of open issues remaining in this exception, the  
13 Commission can and should conclude that SATE meets the FCC's requirement that SATE mirror the  
14 production environment.

## 15 2. Exception 3095

16 Exception 3095 also relates to SATE. In this exception, KPMG notes that there are resale  
17 products and UNEs that are supported by IMA-EDI that are not also supported by SATE.<sup>43</sup>

18 Qwest built SATE to support every resale product and UNE offering for which CLECs had built  
19 IMA-EDI interfaces. Certain other products therefore were not automatically included in SATE.  
20 Nothing in the FCC's prior Section 271 orders specifically requires a BOC to make a stand-alone test  
21 environment available for products that CLECs do not currently order via the EDI interfaces.

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22 <sup>40</sup> *Texas 271 Order*, ¶ 138.

23 <sup>41</sup> *Id.*

24 <sup>42</sup> *Id.*, ¶¶ 138, 134 & n.360. We also note that there was not even a third party test evaluation of the Texas testing  
25 environment, and the FCC approved it nonetheless.

26 <sup>43</sup> See KPMG Disposition Report for Exception 3095, issued April 11, 2002 ("E3095 Disposition Report"), available at  
[www.nrri.ohio-state.edu/oss/master/exceptions/april/e3095disposition\\_report.pdf](http://www.nrri.ohio-state.edu/oss/master/exceptions/april/e3095disposition_report.pdf)

1 Through the CMP Redesign Process, CLECs and Qwest have agreed upon a process for CRs to  
2 be submitted to add products and make other changes to SATE.<sup>44</sup> Both CLECs and Qwest are free to  
3 submit CRs to add products or capabilities to SATE. Through the CMP process, Qwest and CLECs  
4 also jointly prioritize the SATE CRs for inclusion in future EDI releases.<sup>45</sup> In addition, a SATE Users'  
5 Group, composed of representatives of CLECs, Qwest, HP, and KPMG, meets monthly as part of the  
6 CMP Forum.<sup>46</sup> It gives SATE users the opportunity to provide regular feedback to Qwest and to work  
7 jointly with Qwest to develop new SATE CRs.

8 Pursuant to the CMP process, Qwest submitted CRs this winter to add the resale products and  
9 UNEs that are not currently supported by SATE.<sup>47</sup> (At the time SATE was implemented, these products  
10 were ordered by CLECs through IMA-GUI interfaces, if they were ordered at all.) Also pursuant to the  
11 agreed-upon CMP prioritization process, Qwest and CLECs jointly prioritized these CRs. As described  
12 in the CMP prioritization rules, Qwest participated equally with each CLEC in voting on prioritization of  
13 these CRs.<sup>48</sup> The timing of the addition of new products to SATE is not entirely within Qwest's control,  
14 since CLECs participate in the prioritization of SATE CRs under the CMP. The outcome of the  
15 prioritization process was that all but two of the CRs to add additional products to SATE were prioritized  
16 toward the bottom of the list of CRs.<sup>49</sup> Qwest will use the prioritized list to determine what functionality  
17 the 11.0 SATE release should include.

18 The fact that Qwest did not include in its initial rollout of SATE those products that CLECs were  
19 not ordering through Qwest's IMA-EDI interfaces is not an issue under Section 271. The FCC's

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21 <sup>44</sup> See Wholesale CMP §§ 4, 5.

22 <sup>45</sup> *Id.*, § 10.

23 <sup>46</sup> See SATE Users' Group Meeting Minutes, November 13, 2001, available at URL: <http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834,66,00.html>

24 <sup>47</sup> Affidavit of Lynn V. Notarianni in Support of Qwest's Comments Demonstrating Satisfaction of the FCC's Section 271 Change Management Evaluation Criteria ("Notarianni Affidavit"), attached as Exhibit C to Qwest's CMP Compliance Filing, ¶ 11.

25 <sup>48</sup> Wholesale CMP, § 10.

26 <sup>49</sup> *Id.*



1 standard for evaluating electronic interface testing – that the testing environment be "stable" and "mirror  
2 production" – is fully satisfied by SATE, as shown above. SATE is available for those products that are  
3 ordered via electronic interfaces. It is not essential that it be available for every product offered by  
4 Qwest. The CLECs' decision not to assign a high priority to most of the CRs adding products to SATE  
5 is evidence of this.

6 Again, the commercial data also demonstrate that SATE is adequate to permit CLECs to test  
7 EDI interfaces and achieve production status. Five individual CLECs have tested in SATE and achieved  
8 production status, as have five others through a service bureau that tested in SATE. In addition, 26  
9 CLECs have successfully developed EDI interfaces with Qwest using the Interoperability testing  
10 environment.<sup>50</sup> Thus, to the extent there might be a CLEC that would be interested in testing an EDI  
11 interface for a product that is not yet available in SATE, that CLEC may use the Interoperability testing  
12 environment to certify the EDI interface, and may pursue adding that product to SATE through the CMP  
13 process.

14 In sum, any remaining issues identified by KPMG in this exception have been adequately  
15 addressed through the efficacy of the CMP process and through Qwest's available interface testing  
16 options.

### 17 **3. Exception 3109**

18 This exception relates to Qwest's testing environment for CLECs that are building interfaces to its  
19 Mediated Access Electronic Bonding for Trouble Administration (MEDIACC EB-TA).<sup>51</sup> EB-TA is  
20 Qwest's computer-to-computer maintenance and repair interface, and is used by both CLECs and  
21 interexchange carriers. EB-TA is offered as an alternative to CEMR, an online system for maintenance  
22 and repair.

23 As an initial matter, the FCC has never required that BOCs provide CLECs with an electronic  
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25 <sup>50</sup> Notarianni Affidavit, attached as Exhibit C to Qwest's CMP Compliance Filing, at ¶ 4.

26 <sup>51</sup> KPMG Disposition Report for Exception 3109, issued March 19, 2002 ("E3109 Disposition Report"), available at  
[www.nrri.ohio-state.edu/oss/master/exceptions/mar/e3109disposition\\_report.pdf](http://www.nrri.ohio-state.edu/oss/master/exceptions/mar/e3109disposition_report.pdf)

1 interface for maintenance and repair activities in order to obtain Section 271 approval. As the FCC has  
2 stated:

3           The FCC has in the past held that the provision of an integrated,  
4           computer-to-computer maintenance and repair interface is not required to  
5           satisfy the "substantial same time and manner" test, provided that the  
6           BOC otherwise demonstrates that it provides equivalent access to its  
7           maintenance and repair functions.<sup>52</sup>

8           Because access to an electronic interface for maintenance and repair is not required for Section  
9           271, the test environment for EB-TA cannot be a Section 271 requirement. In addition, the FCC has not  
10          applied its "stable test environment that mirrors production" requirement beyond pre-ordering and  
11          ordering transactions.<sup>53</sup> The closed unresolved status of this exception thus is not an issue under Section  
12          271, and the Commission need not consider it in its Section 271 evaluation of Qwest.

13          We nevertheless address in this filing the issues raised by KPMG in this Exception, in order to  
14          provide the Commission with the full picture of interface testing for EB-TA, and because EB-TA was  
15          included within the scope of the OSS test. As discussed below, Qwest believes that the testing  
16          environment it provides is more than sufficient to enable CLECs successfully to test their electronic  
17          interface with Qwest's maintenance and repair functions prior to production. This conclusion is supported  
18          by the commercial data.<sup>54</sup>

19          EB-TA is a robust, computer-to-computer interface that allow CLECs to submit, modify, and  
20          track repair tickets for resale, UNEs, and UNE-P for both designed and non-designed services.<sup>55</sup> The  
21          interface, which is based on ANSI standard documents, was developed for interexchange carrier trouble  
22          tickets in 1996 and began supporting CLECs in 1997.<sup>56</sup> To date, four CLECs have successfully built and

23 <sup>52</sup> See *New York 271 Order*, 15 FCC Rcd at 4069 (¶ 215).

24 <sup>53</sup> See, e.g., *Kansas/Oklahoma 271 Order*, 16 FCC Rcd at 6319 (¶ 168).

25 <sup>54</sup> Notarianni Affidavit, attached as Exhibit C to Qwest's CMP Compliance Filing, ¶ 6.

26 <sup>55</sup> See Draft Report, Test 17, § 2.1, p. 344. At a high level, the term "designed services" refers to POTS.

<sup>56</sup> Notarianni Affidavit, attached as Exhibit C to Qwest's CMP Compliance Filing, ¶ 6.

1 tested to Qwest's EB-TA interface.<sup>57</sup> The testing process is rigorous, and includes gateway to gateway  
2 testing, stack to stack testing, end to end system testing, and operational readiness testing. Qwest  
3 provides carriers with all necessary documentation and technical assistance.<sup>58</sup> The testing environment  
4 permits CLECs to test all capabilities of production EB-TA.

5 KPMG tested several aspects of the EB-TA interface, and found it satisfactory in every respect  
6 other than that identified in E3109. It determined that CLECs were able to test all of the agreed-upon  
7 scenarios, and it did not have criticisms of the scope or functionality of the test environment. In Test 17, it  
8 examined the existence and expected behavior of the EB-TA interface by submitting trouble tickets  
9 through a CLEC's gateway. It compared the actual results with expected results. Qwest satisfied all  
10 criteria with 100 percent results and without the issuance of any observations or exceptions.<sup>59</sup> In Test  
11 24.6, with the sole exception of Criterion 24.6-2-9 (the issue in E3109), KPMG found that all test  
12 criteria were satisfied, including methodology, interface specifications, carrier-to-carrier testing,  
13 production interface support, and capacity management of the interface.<sup>60</sup>

14 KPMG issued Exception 3109 because, during end-to-end EB-TA testing, test scenarios for  
15 non-designed services are processed by the Loop Maintenance Operating System ("LMOS") production  
16 mainframe.<sup>61</sup> Apparently, in KPMG's view, the test environment for all components of the testing process  
17 should be physically separate from the production environment, with access provided to a duplicate of the  
18 LMOS production database.<sup>62</sup> As noted above, however, the FCC has never established a Section 271

19 \_\_\_\_\_  
20 <sup>57</sup> *Id.*

21 <sup>58</sup> A description of the MEDIACC-EB-TA implementation process is provided on the Qwest Wholesale web site at  
22 <http://qwest.com/wholesale/systems/mediacc-ebta.html>.

23 <sup>59</sup> Draft Final Report, Test 17.3, Table 17-3 (MTP criteria 17-1-1 to 17-1-8), p. 352.

24 <sup>60</sup> Draft Final Report, Test 24.6, Table 24.6-2.1, p. 588.

25 <sup>61</sup> See E3109 Disposition Report at 1. When a CLEC submits a repair ticket through EB-TA, the ticket is  
26 electronically generated and passed to one of two Qwest backend systems. It is passed to LMOS for non-designed  
tickets and to the Work Force Administration/Control (WFA/C) for designed tickets. See Draft Final Report, Test 24.6,  
Table 24-6-2-1 (MTP criterion 24.6-2-9), pp. 610-11. The tickets are then processed, as are all Qwest repair tickets, by  
LMOS and WFA and all attending statuses are electronically passed back to the CLEC through EB-TA.

<sup>62</sup> KPMG also found the process of testing non-designed services cumbersome, due to the necessary manual  
intervention of the Qwest Tester. E3109 Disposition Report at 2-3. It cited an instance in which a CLEC had two of its

1 requirement that a test environment be physically separate from production or mirror production for  
2 functions other than preordering and ordering.<sup>63</sup>

3 There is no question that the EB-TA test environment provides CLECs with a true representation  
4 of how transactions will function and respond in Qwest's EB-TA production environment. In Qwest's  
5 experience, the fact that EB-TA testing uses the LMOS production applications is not detrimental or  
6 limiting, but rather it is advantageous to the CLEC, because it permits the full functionality of EB-TA to be  
7 tested. The EB-TA test environment encourages cooperative testing, provides interface test management  
8 controls, and provides a true representation of how transactions will function and respond in the  
9 production environment. As noted above, four CLECs have tested successfully using EB-TA, and the  
10 interface has been utilized successfully by CLECs and interexchange carriers for six years.<sup>64</sup> For these  
11 reasons, Qwest satisfies the applicable Section 271 FCC test for CLEC access to maintenance and  
12 repair functions.

### 13 **III. CONCLUSION**

14 That only ten Exceptions – out of a total of nearly 500 Observations and Exceptions and 545 test  
15 points – were closed/unresolved testing provides a clear indication that Qwest's OSS today performs  
16 exceptionally well. The issues raised by these Exceptions are easily explainable, and, for the most part,  
17 obviated by other evidence. This handful of closed/unresolved Exceptions do not stand in the way of a  
18 finding by this Commission that Qwest's OSS satisfies the requirements of Section 271.

19 QWEST CORPORATION  
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22 test trouble reports pass by the Qwest Tester to the Qwest Production Screeners. See Draft Final Report, Test 24.6,  
23 Table 24.6-2-1, (MTP criterion 6-2-9), p. 611. The Screeners proceeded to call the CLEC's production operation center  
24 to obtain additional information and/or dispatch permission, and the trouble reports were cancelled. The production  
25 environment was not ultimately impacted. See KPMG Comments (2/21/02) on E3109 at 4. Moreover, as discussed  
26 above, Qwest believes there are advantages for CLECs in having access to production systems for testing, and the  
commercial data show that the EB-TA testing process works.

<sup>63</sup> See, e.g., *Texas 271 Order*, 15 FCC Rcd. at 18419 (¶ 132).

<sup>64</sup> Notarianni Affidavit, attached as Exhibit C to Qwest's CMP Compliance Filing, ¶ 6.

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