

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION

In the Matter of the Investigation Into	)	
U S WEST Communications, Inc.'s	)	Docket No. UT-003022
Compliance With Section 271 of the	)	
Telecommunications Act of 1996	)	
_____	)	
	)	
In the Matter of U S WEST Communications	)	Docket No. UT-003040
Inc.'s Statement of Generally Available	)	
Terms Pursuant to Section 252(f) of the	)	
Telecommunications Act of 1996	)	

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**JOINT CLEC COMMENTS ON OSS TEST REPORT**

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**I. INTRODUCTION**

WorldCom, Inc., on behalf of its regulated subsidiaries, and Covad Communications Company, (collectively "the Joint CLECs") submit these opening comments on the Operations Support Systems Test Report ("OSS Report"). In these Comments, the Joint CLECs will address the status of Test 23 relating to Change Management, Test 24.6 relating to OSS Interface Development and data relied upon by KPMG for several tests provided by Eschelon Telecom Inc., Covad Communications Company and McLeod USA. In addition, attached hereto as Exhibit A are notes and brief comments addressing several other tests addressed in the Final Report as well as Tests 23 and 24.6.

The Joint CLECs incorporate any previously filed comments and briefs, prepared either individually or jointly with other competitive local exchange carriers, addressing Qwest's Change Management Process ("CMP"), Qwest's stand-alone test environment ("SATE"), and Qwest's data reconciliation. Finally, the Joint CLECs concur in and join

in the comments filed by AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services on behalf of TCG Seattle and TCG Oregon (“AT&T”) also filed this date.

## II. DISCUSSION

### A. Test 23: Change Management

The third party Exceptions regarding Change Management Process (“CMP”) were closed prematurely at Qwest’s request. Although Qwest sought limited “retesting” of Exceptions 3094 and 3110, Qwest imposed an artificial timeframe upon KPMG to conduct the retesting of these exceptions rather than allowing KPMG to complete its observations of Qwest CMP. Therefore, there is no observation of compliance for three CMP exceptions, 3094, 3110 and 3111.

Test 23 evaluated:

Qwest’s change management process used by Competitive Local Exchange Carriers (CLECs) engaged in the Qwest-CLEC business relationship. The objectives of the test were to determine the adequacy and completeness of procedures for developing, publicizing, evaluating, and implementing changes to Qwest’s Wholesale Operational Support System (OSS) interfaces and business processes. The test also focused on the tracking mechanisms of proposed changes and adherence to established change management intervals.<sup>1</sup>

KPMG displayed the results of the CMP evaluation separately for “Systems CMP” and Product/Process CMP. Criteria 23-1-X related to Systems CMP, whereas criteria 23-2-X related to Product/Process CMP. Three Test 23 Criteria related to Systems CMP, namely Criteria 23-1-7, 23-1-8 and 23-1-9 were found to be “unable to determine” and four Product/Process CMP criteria, namely Criteria 23-2-2, 23-2-7, 23-2-8, and 23-2-9, were found to be “unable to determine.”

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<sup>1</sup> See, KPMG OSS Draft Report, Test 23, Section 1.0, at page 523.

Criteria 23-2-8 is associated with Exception 3094. Under Exception 3094, as was discussed extensively in the Joint CLECs Brief filed previously, stated that Qwest did not adhere to its established CMP for notifying CLECs about a proposed change, and allowing input from all interested parties.

After the limited retest of Exception 3094, the exception was once again closed-unresolved. In its Supplemental Disposition Report dated May 21, 2002, KPMG stated the following on this Exception:

**Summary of KPMG Consulting's Retest Results:**

The procedures for Qwest-initiated Product/Process changes underwent considerable revision in April 2002. Since the inception of the interim process on April 1, 2002, Qwest and CLECs changed the number of Qwest-initiated Product/Process change categories from four to five, and revised the criteria for categorizing such changes within defined levels. Qwest documented the revised process in the *Master Redlined CLEC-Qwest CMP Redesign Framework* document.

KPMG Consulting confirmed that Qwest initiated seven changes between April 1, 2002, and April 26, 2002. KPMG Consulting reviewed the relevant Qwest notifications and found that five of the changes were initiated after April 16, 2002, the date on which Qwest and CLECs reached agreement about the revised process. These five notifications include four Level 1 changes and one Level 2 change. Since the draft CMP document specifies that Level 1 changes are effective immediately upon notice to CLECs, there was no change implementation interval associated with this type of notification. KPMG Consulting verified that the one Level 2 change followed the 21-day advance notification interval. Due to the relatively few notifications issued since April 16, 2002 under the new process, KPMG Consulting was unable to make a conclusive determination that Qwest adheres to the process for Qwest-initiated Product/Process changes.

Qwest and CLECs will continue discussions about the process for postponing a Product/Process change on May 21, 2002. This component of the Product/Process CMP is relevant to this Exception, which concerns the "notice-and-go" nature of the Product/Process CMP and lack of CLEC input for Product/Process changes. Based on this unresolved component, it appears that Qwest and CLECs have not developed all pertinent components of the Product/Process CMP.

KPMG Consulting recommends that Exception 3094 be closed unresolved.

Criteria 23-1-8 is associated with Exception 3111. That exception was previously closed inconclusive and was not subject to any retesting after KPMG made its finding. Exception 3111 stated that Qwest's CMP lacked guidelines for prioritizing and implementing CLEC initiated systems change request as was also extensively discussed in the Joint CLECs previously filed brief.

Finally, Criteria 23-1-7 is associated with Exception 3110. Exception 3110 stated that Qwest did not adhere to its CMP document management standards and tracking of CLEC notifications through the Mailout Notification System. After the limited retest of Exception 3110, the exception was once again closed-unresolved. With respect to Exception 3110 in its Supplemental Disposition Report dated May 21, 2002, KPMG stated as follows:

**Summary of KPMG Consulting's Retest Results:**

KPMG Consulting identified a total of eight software release notifications distributed between April 4, 2002 and May 3, 2002. These notifications included release updates for five different Qwest OSS interfaces and the retirement of IMA Release 9.0. Because of the relatively few notifications available for review, KPMG Consulting was unable to fully validate Qwest's adherence to the specified intervals.

KPMG Consulting found that Qwest appeared to have missed the distribution date for IABS Release 84. Qwest attributed this discrepancy to the lack of any CLEC-impacting changes in this particular OSS release. Qwest also stated that it had removed this IABS release from the OSS Release Calendar Version 9.0. Although KPMG Consulting understands that changes in release schedules occur, it considers consistency in the flow and distribution of information to be an important element in managing the Qwest-CLEC business relationship. KPMG Consulting, therefore, would expect the published OSS Release Calendar<sup>2</sup> to include

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<sup>2</sup> The OSS Release Calendar is located at <http://www.qwest.com/wholesale/cmp/osscalendar.html>.

this previously scheduled version of IABS in the list of interfaces for “No Planned Releases” section of the document.

KPMG Consulting noted that Qwest frequently applied changes to the notification dates and content in the OSS Release Calendar. During the period January 2002 through May 2002, Qwest issued ten versions of the OSS Release Calendar but did not immediately or consistently notify CLECs of all changes applied. CLECs are likely to face difficulties in coordinating the necessary resources for a new or upgraded system release if the published release dates frequently change.

Based on the observations noted during re-testing, KPMG Consulting was unable to conclusively verify Qwest’s consistent adherence to stated CMP intervals for software release notifications. KPMG Consulting concluded its retest period on May 17, 2002.

KPMG Consulting recommends that Exception 3110 be closed as inconclusive.

Based upon the criteria that KPMG was unable to determine, it is premature to accept Qwest’s CMP as compliant until such time as KPMG and Liberty, through PO-16, have sufficiently observed actual, present compliance.

The Federal Communications Commission (“FCC”) has established criteria for evaluating a change management plan.<sup>3</sup> In the recent Georgia/Louisiana (“GA/LA”) 271 decision released May 15, 2002, the FCC applied those criteria and stated:

. . . the Commission has explained that it must review the BOC’s change management procedures to determine whether these procedures afford an efficient competitor a meaningful opportunity to compete by providing sufficient access to the BOC’s OSS. In evaluating whether a BOC’s change management plan affords an efficient competitor a meaningful opportunity to compete, we first assess whether the plan is adequate by determining whether the evidence demonstrates: (1) that information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) that competing carriers had substantial input in the design and continued operation of the change management process; (3) that the change management plan defines a procedure for the timely resolution of change management disputes; (4)

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<sup>3</sup> See, In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services In Georgia and Louisiana, CC Docket No. 02-35, para. 179, at p. 102.

the availability of a stable testing environment that mirrors production; and (5) the efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway. After determining whether the BOC's change management plan is adequate, we evaluate whether the BOC has demonstrated a pattern of compliance with this plan. (footnotes omitted.)

As stated in the Joint CLEC previously filed Brief, Qwest has not yet met the FCC's criteria because the redesign process is not complete, and therefore, Qwest has failed to meet the FCC's first criteria. As noted below, Qwest has also failed to meet the fourth criteria of having a stable testing environment that mirrors the production environment. Finally Qwest has failed to demonstrate a pattern of compliance with its plan.

**B. Test 24.6: OSS Interface Development**

Test 24.6 evaluated:

Qwest's OSS interface development procedures. Specifically, the test evaluated Qwest's documentation, specifications, and support provided to Competitive Local Exchange Carriers (CLECs) in developing, providing, and maintaining OSS interfaces for pre-ordering, ordering, maintenance and repair, and billing. This test also included an assessment of Qwest's capacity management and growth planning processes. The objectives of this test were to determine the adequacy, consistency, and completeness of Qwest's specifications, documentation and technical assistance provided to the CLECs for developing, testing, and operating OSS interfaces for pre-ordering, ordering, maintenance and repair, and billing.

In Test 24.6, two Test Criteria were found to be "not satisfied."

**1. Criteria 24.6-1-8: A functional test environment is made available to customers for all supported interfaces.**

Criterion 24.6-1-8 is associated with Exceptions 3077 and 3095. Exception 3077 states that Qwest's IMA EDI SATE does not offer CLECs sufficient testing capabilities, and was Closed/Unresolved and not subject to further retesting. Exception 3077 was discussed extensively in the Joint CLECs previously filed Brief. However, in summary,

KPMG Consulting found that the, “IMA EDI SATE [Stand Alone Test Environment] does not provide sufficient testing capabilities for CLECs prior to connecting to Qwest’s production systems.”<sup>4</sup>

Certain limitations in the IMA EDI SATE were identified by KPMG, including the following:

SATE does not generate post-order responses in the same manner as they are created in the production environment.

Flow-through orders are not supported in SATE, even though these types of orders will be processed in the production environment.

The volume of order responses supported in SATE is restricted due to manual response handling.

The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

A limited or insufficient testing environment could delay the timely implementation of a CLEC’s IMA EDI release. Also, problems could arise in the production environment that may have otherwise been avoided if SATE more closely mirrored the production environment. These factors could increase a CLEC’s operating expenses as a result of additional time required to ensure the functionality of the systems, and could inhibit revenues if testing delays hinder a CLEC’s ability to service its customers.<sup>5</sup>

In Exception 3095, KPMG Consulting identifies Qwest’s failure to have all products supported by its EDI test environment. KPMG Consulting states, “Qwest’s Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs testing capabilities for all Qwest

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<sup>4</sup> Exception 3077, Disposition Report, April 15, 2002.

<sup>5</sup> Exception 3077, Disposition Report, April 15, 2002 (emphasis added).

products offered in production.<sup>6</sup> Exception 3095 was also discussed extensively in the Joint CLECs previously filed Brief.

In summary, KPMG Consulting found, “the process for adding new functionality to SATE is onerous and untimely for a CLEC expecting to test unsupported functionality during its EDI implementation.”<sup>7</sup> In response to Qwest’s opinion that the interoperability environment was an acceptable substitute for SATE, KPMG Consulting expressed its disagreement with that opinion as follows:

KPMG Consulting stated that the use of the Interoperability environment for testing products not currently supported in SATE did not sufficiently address the issues raised in this Exception. Several limitations had been identified regarding the Interoperability environment in Exception 3029. Additionally, Qwest had stated that it would only invest resources to further develop SATE, and that SATE would overcome the deficiencies of Interop as a testing environment. Based on these facts, KPMG Consulting did not believe that Interop provided CLECs with a suitable alternative for testing products not supported in SATE.<sup>8</sup>

This exception was assigned a status of closed/unresolved at the request of Qwest. The “closed/unresolved” status of Exceptions 3077 and 3095 resulted in KPMG Consulting reaching a conclusion of “Not Satisfied” for the evaluation criteria of “A functional test environment is made available to customers for all supported interfaces.”<sup>9</sup>

Accordingly, and as stated in the previously filed Joint CLEC Brief, Qwest’s SATE cannot be found to be a stable testing environment that mirrors the production environment. The Commission should make a finding of non-compliance with checklist item 2, or compliance conditional upon KPMG Consulting finishing its evaluation of

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<sup>6</sup> Exception 3095, December 11, 2001.

<sup>7</sup> Exception 3095, Disposition Report, April 11, 2002.

<sup>8</sup> Exception 3095, Disposition Report, April 11, 2002.

<sup>9</sup> Qwest Communications, OSS Evaluation, Draft Final Report (“Draft Final Report”), Version 1.0, April 19, 2002, p. 587.



Qwest's purported SATE fixes and KPMG Consulting concluding that all of the identified deficiencies have been corrected.

**2. Criteria 24.6-2-9: Carrier-to-carrier test environments are available and segregated from Qwest production and development environments.**

Criterion 24.6-2-9 is associated with Exception 3109. Exception 3109 states that Qwest's Mediated Access Electronic Bonding and Trouble Administration (MEDIACC-EBTA) End-to-End testing lacks a complete testing environment. This exception concerns the deficiencies of Qwest testing environment for the EB maintenance and repair interface.<sup>10</sup> In the testing of the EBTA maintenance and repair interface, a CLEC must have its transactions processed through Qwest's production systems. KPMG Consulting identified two problems with Qwest's approach. The first, "By using the LMOS production mainframe for CLEC testing purposes, Qwest does not provide CLECs with a test environment that is completely separate from the production environment."<sup>11</sup> The second problem of using production systems in a test environment is it, "limits certain test scenarios, as there are particular circumstances in which Qwest is not able to prevent services from being dispatched."<sup>12</sup> Because of these problems, KPMG Consulting concluded, "the Qwest EBTA testing environment does not provide CLECs with a true representation of how transactions will function and respond in Qwest's EBTA production environment." Consequently, Qwest's testing environment for EBTA would fail the FCC's requirement that Qwest provide CLECs with a stable testing environment that mirrors the production environment.<sup>13</sup>

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<sup>10</sup> Exception 3109, opened January 22, 2002.

<sup>11</sup> Exception 3109, Disposition Report, March 19, 2002.

<sup>12</sup> Exception 3109, Disposition Report, March 19, 2002.

<sup>13</sup> BANY Order, ¶ 109.

KPMG Consulting rejected Qwest's attempts to mitigate the impact of the problems that KPMG Consulting identified. As a result of the continuing deficiencies in Qwest's EBTA testing environment, KPMG Consulting found that Qwest had "Not Satisfied" the evaluation criteria that, "[c]arrier-to-carrier test environments are available and segregated from Qwest production and development environments."<sup>14</sup>

Once again in the GA/LA 271 decision the FCC stated:

A stable testing environment that mirrors the production environment and is physically separate from it is a fundamental part of a change management process ensuring that competing carriers are capable of interacting smoothly and effectively with a BOC's OSS, especially in adapting to interface upgrades. Moreover, a testing environment that mirrors production avoids a "competing carrier's transactions succeeding in the testing environment but failing in production." (Footnotes omitted.)<sup>15</sup>

Although the FCC has approved test environments that do not fully test end-to-end, stating, "competing carriers are able to test adequately OSS changes prior to their implementation as long as the testing and production environments perform the same key functions,"<sup>16</sup> KPMG found that Qwest failed to satisfy the requirement that a functional test environment is made available to customers for all supported interfaces and that carrier-to-carrier test environments are available and segregated from Qwest production and development environments. These are fundamental failures of OSS interface testing.

Therefore, the Commission should either find non-compliance with checklist item 2 or withhold any finding of compliance with checklist item 2 until KPMG Consulting finishes its evaluation of Qwest's purported SATE fixes. Before Qwest can be found to be in compliance with the checklist, KPMG Consulting must conclude that all of the

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<sup>14</sup> Draft Final Report, p. 604.

<sup>15</sup> See, GA/LA 271 decision, para. 187, a pp. 107 & 108.

<sup>16</sup> *Id.* para. 189 at p. 109.

identified deficiencies have been corrected and that Qwest has developed an adequate test environment for the EBTA maintenance and repair interface.

**C. Tests 14, 12, 12.7, 18, 18.7, 18.8, 23, 24.5 and 24.6**

On May 7, 2002, KPMG released a report, attached here as Exhibit B, that analyzed specific test sections that contain conclusions that are based, in whole or in part, on representations, information, or data obtained from, or provided by Eschelon Telecom Inc., Covad Communications Company, and McLeod USA. KPMG stated that:

First, KPMG Consulting makes no assertion as to the accuracy or completeness of the information provided by the three CLECs. Second, KPMG Consulting makes no assertion as to whether or not the information received from the three CLECs is representative of the “typical” CLEC experience, given the preferential treatment the three CLECs may have received from Qwest.

With respect to Test 14, for criteria 14-1-9, 14-1-21, 14-1-25, and 14-1-27, KPMG stated that it had substantially relied on several of the three CLECs’ representations, information or data as the primary data point used by KPMG Consulting in drawing its conclusions for those criteria.

With respect to Tests 12, 12.7, 14, 18, and 24.6, KPMG partially relied on several of the three CLECs’ representations, information or data as one data point among many.

Finally, with respect to Tests 18.7, 18.8, 23 and 24.5, KPMG relied to some degree on several of the three CLECs’ representations, information or data for these tests in general, but not for any particular evaluation criteria contained within the tests.

The Joint CLECs understand that the Commission received into evidence in the hearings held on Public Interest issues, Track A, and Section 272 requirements, the agreements between Qwest and the three CLECs identified by KPMG in its report issued

May 7, 2002. The Commission is therefore, in the position to evaluate whether any of the three CLECs received improper preferential treatment. Covad does not believe it received preferential treatment from Qwest. However, the same may not be said for other CLECs, including Eschelon Telecom, Inc., which appeared eligible to receive 10 percent discounts off of UNE rates for consulting services provided to Qwest as well as other preferential treatment that was not offered to the Joint CLECs.

WorldCom specifically sent questions to KPMG concerning the report issued May 7, 2002. On May 23, 2002, KPMG responded to those questions. A copy of the answers is attached here as Exhibit C. WorldCom still has concerns about the data relied upon by KPMG and any data reconciliation KPMG has done that relates to the data relied upon as referenced in response to Question k.

### **III. CONCLUSION**

For the reasons stated here and the comments filed by AT&T, the Joint CLECs contend that Qwest does not provide nondiscriminatory access to its OSS or allow CLECs a meaningful opportunity to compete in the local market.

The undersigned is authorized to sign and file this pleading on behalf of Covad Communications Company.

Dated: June 3, 2002.

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**VERIFICATION**

The foregoing factual statements are true and correct to the best of my knowledge and belief.

\_\_\_\_\_  
Rebecca L. Oliver

Subscribed and sworn to before me this \_\_\_\_ day of June, 2002.

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Notary Public