

ROC OSS TEST FINAL REPORT ISSUES

Notes:

- Issues are listed in sequential order by Test number.
- Test Criteria included herein have been copied from the Final Report with no modifications with the exception that some text has been bolded to provide emphasis for the reader.

TEST 12
POP Functional Evaluation

Not Satisfied: 12-9-4 & 12-9-5

Test Criteria not satisfied for Test 12 provide data showing that Qwest does not provide timely Jeopardy notices for Resale and UNE-P products.

KPMG had opened O3108 because no decision could be reached to determine if Qwest is in parity for PID PO-9 (measures that Qwest provides parity in providing timely Jeopardy notices). The Joint CLEC comments regarding concerns with the un-proven ability of Qwest to provide timely Jeopardy notices for Resale and UNE-P stand. Reference Joint CLEC comments for Test 12, criteria 12-9-4 and 12-9-5.

12-9-4	Qwest systems or representatives provide timely Jeopardy notices for Resale products and services.	Not Satisfied	<p>Qwest systems or representatives provide timely Jeopardy notices for Resale products and services.</p> <p>The PID (PO-9)-defined standard is parity with Retail service.</p> <p>During testing, KPMG Consulting identified 8 missed resale Orders for which no jeopardy notice was received by the P-CLEC. The dual statistical test for the PO-9 PID resulted in a “no decision” for this PID. Per the MTP guidelines, KPMG Consulting submitted this issue to the attention of the TAG, whose discussion resulted in an impasse. Subsequently, the Steering Committee determined that Qwest should receive a failure for this PID.</p>
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12-9-5	Qwest systems or representatives provide timely Jeopardy notices for UNE-P.	Not Satisfied	<p>Qwest systems or representatives provide timely Jeopardy notices for UNE-P.</p> <p>The PID (PO-9)-defined standard is parity with Retail service.</p> <p>During testing, KPMG Consulting identified 11 missed UNE-P Orders for which no jeopardy notice was received by the P-CLEC. The dual statistical test for the PO-9 PID resulted in a “no decision” for this PID. Per the MTP guidelines, KPMG Consulting submitted this issue to the attention of the TAG, whose discussion resulted in an impasse. Subsequently, the Steering</p>
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			Committee determined that Qwest should receive a failure for this PID.
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Unable to Determine: 12-9-1, 12-9-2, & 12-11-4

Test Criteria 12-9-1 & 12-9-2 relate to the issue with Qwest’s ability to provide Jeopardy notices for Resale and UNE-P. Since no Jeopardy data became available during the test, these criteria weren’t able to be determined. This fact makes the findings for criteria 12-9-4 & 12-9-5 even more critical since their findings represent all the Resale and UNE-P jeopardy data that is available.

Criterion 12-11-4 is tied to O3110 which was Closed/Unresolved May 28th. The “unable to determine” status of this criterion highlights the existence of manual handling in calculating performance measures, and how resulting errors will negatively impact performance measure calculations. O3110 states: “During the course of retesting Exception 3120, Qwest identified human error as the root cause for discrepancies identified with the calculation of provisioning intervals for PID OP-4.” And in KPMG’s closing of O3110 as Closed/Unresolved it stated: “Based on this limited review, KPMG Consulting reaffirms that the only way to properly address this observation is to conduct a retest that focuses on orders that drop out for manual handling. As Qwest elected not to conduct such a retest, this observation will be closed/unresolved.”

12-9-1	Qwest provides Jeopardy Notices in advance of the due date for Resale products and services.	Unable to Determine	Qwest provides Jeopardy Notices in advance of the due date for Resale products and services. The PID (PO-8)-defined standard is parity with Retail service. During the evaluation period, Qwest did not issue any Jeopardy Notices for Resale products and services in response to test bed transactions or commercial observations. Therefore, KPMG Consulting’s results are inconclusive.
12-9-2	Qwest provides Jeopardy Notices in advance of the due date for UNE-P products.	Unable to Determine	Qwest provides Jeopardy Notices in advance of the due date for UNE-P products. The PID (PO-8)-defined standard is parity with retail service. During the evaluation period, Qwest did not issue any Jeopardy Notices for UNE-P products and services in response to test bed transactions or commercial observations. Therefore, KPMG Consulting’s results are inconclusive.
12-11-4	Qwest-produced measures of Pre-Order/Order performance results for HPC transactions are consistent with KPMG Consulting-produced HPC measures.	Unable to Determine	During the course of KPMG Consulting’s comparative analysis of Qwest-produced HPC measures to KPMG Consulting-produced HPC measures, KPMG Consulting formally identified a discrepancy in the reporting of Firm Order Confirmations (FOCs)

			<p>for PID PO-5. For Test 12, this comparative analysis involved the PO family measures.</p> <p>Based on the completion of the Liberty Consulting re-audit of the PID measures and the resolution of the observation associated with the PO-5 discrepancy, KPMG Consulting concluded that Qwest satisfactorily addressed this issue.</p> <p>Due to human error issues identified in Exception 3120 and Observation 3110 regarding manual processing of data intended for use in PID reporting, KPMG Consulting identified a need for additional retesting.</p> <p>Without further retesting specifically designed to assess the impact of human error on the accuracy and completeness of Qwest’s PID reporting, KPMG Consulting is unable to conclude that Qwest satisfied this evaluation criterion. On a focus call held May 24, 2002, Qwest elected not to conduct any additional retesting.</p> <p>See Exception 3120 for additional information on these issues. Exception 3120 is closed; Observation 3310 is closed/unresolved.</p>
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Other Test 12 Issues discussed during vender technical conference # 3 (“VTC 3”):

Test did not purposefully include LSRs with multiple errors

In production, CLEC transmitted LSRs may contain multiple error conditions that need to be corrected and retransmitted on a supplemental request. It is critical that when LSRs with multiple error conditions are returned / rejected to the CLEC, that all applicable errors are identified. Handling errors one at a time (receiving multiple rejects, and sending multiple supplemental orders) wastes time and delays the CLEC’s order. It is imperative that whether a LSR is mechanically or manually returned with errors, that all the LSR’s problems are identified. Verification during the Test of Qwest’s ability to comprehensively identify multiple errors on a LSR was only done on a very limited and untracked basis when the P-CLEC accidentally transmitted a LSR with more than one error.

Question with Qwest’s practice of sending Reject notices post-FOC

WorldCom has requested that during Colorado’s OSS Test Workshop HP confirm if there was verification that Qwest’s practice of sending Reject notices after FOC (experienced during testing) has completely ceased so that Jeopardies are consistently transmitted for order problems that occur after FOC. Per industry guidelines, Reject notices should not be used once a FOC has been generated.

TEST 12.8

POP Manual Order Processing Evaluation

Unable to Determine: 12.8-2

Criterion 12.8-2 is related to Test 12 Criterion 12-11-4 and O3110, and Qwest's ability to accurately apply its manual handling processes so that they do not negatively impact CLEC order handling. Because not all CLEC orders are mechanically processed or flow through Qwest's systems without manual intervention, it is crucial that the manual handling be consistently and accurately applied. Without verification that Qwest's manual order handling procedures are sufficient, there is an incomplete assurance that non-flow-through CLEC orders will be effectively and efficiently processed.

<p>12.8-2</p>	<p>Procedures for processing electronically submitted non-flow through orders are defined, documented, and followed.</p>	<p>Unable to Determine</p>	<p>Procedures for processing electronically submitted non-flow through orders are defined, documented, and followed. These procedures are described in the Initial Systems Training Guide and InfoBuddy. Ordering processes and procedures are available for CLEC review at http://www.qwest.com/wholesale/clecs/ordering.html. Observations by KPMG Consulting confirmed adherence to the methods and procedures described by Qwest personnel in interviews, and reviewed by KPMG Consulting during documentation analysis. Qwest personnel also described their use of job aids and information found in InfoBuddy as supplements to the initial systems training that SDCs receive. KPMG Consulting observed SDCs using job aids such as the SDC Order Planning Sheet to assist in the handling of manual orders.</p> <p>During the execution of Test 12, Evaluation of POP Functionality and Performance versus Parity Standards and Benchmarks, HPC identified issues related to the issuance of manual FOCs¹. As a result, KPMG Consulting performed additional observations, interviews, and documentation reviews to further investigate HPC’s findings. KPMG Consulting issued Exception 3078.</p> <p>Subsequently, Qwest SMEs provided additional information to KPMG Consulting regarding Qwest mechanisms and processes for issuing FOCs. Qwest also revised its internal documentation and issued a Multi-Channel Communicator (MCC) to SDCs to reinforce the processes for issuing FOCs. Copies of these documents were provided to KPMG Consulting.</p> <p>After documentation analysis and additional observations at Qwest ISCs, KPMG Consulting determined that Qwest representatives adhere to the guidelines set forth for manually issuing FOCs. See Exception 3078 for additional information. Exception 3078 is closed.</p> <p>KPMG Consulting formally identified issues with Qwest’s training of personnel on related processes and procedures. KPMG Consulting conducted additional</p>
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¹ See HPC Exceptions 2010, 2017, 2030, 2031, 2032, 2033, 2034, 2037, and 2054. Exception 2017 is withdrawn. Exceptions 2010, 2030, 2031, 2032, 2033, 2034, 2037, and 2054 are closed.

			<p>evaluation and monitoring activities including interviews, observations, and documentation reviews. KPMG Consulting subsequently determined that Qwest’s training, continuous improvement measures, and new quality initiatives adequately address the identified issues.</p> <p>During retesting of Exception 3120 (see Test 14, Provisioning Evaluation), KPMG Consulting formally identified issues regarding orders that dropped for manual handling. Qwest elected not to conduct further retesting of this issue. Thus, KPMG Consulting is unable to assign a result for this evaluation criterion.</p>
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**TEST 13
Order Flow Through Evaluation**

Diagnostic criteria with possible issues:

Criterion 13-1-2 identifies that only 51.86% of orders submitted via IMA EDI flow through to Qwest’s SOP (Service Order Processor) without manual intervention. And criterion 13-1-7 identifies that only 50.45% of orders submitted via IMA GUI flow through to SOP without manual intervention.

KPMG only reported the percentages of flow through, and did not draw any conclusions on how the level of flow through provided by Qwest would impact CLECs (since the related PIDs are diagnostic). The level of flow through available to CLEC orders directly impacts the efficiency and effectiveness of how the orders are handled. Adequate flow through levels are even more critical as order volumes increase-which would be expected when local competition in Qwest’s territory grows. The absence of flow through creates the need for manual intervention and introduces the risk for mis-handling of orders as a multitude of business rules must be manually (instead of automatically) applied and done so consistently and accurately.

The availability of only approximately 52% flow through for orders electronically submitted via IMA EDI and only approximately 50% flow through for orders electronically submitted via IMA GUI creates a risky environment for CLEC orders. Furthermore, these low levels of flow through make the Test’s findings related to Qwest’s manual handling (criteria 12-11-4, 12.8-2, 14-1-44, and O3110) even more troubling.

13-1-2	Order transactions submitted via IMA EDI flow through to the SOP.	Diagnostic	<p>The PID-defined standard for PO-2A for the purpose of this test is “Diagnostic.” Test results are provided as diagnostic information only.</p> <p>Of 3,650 order transactions submitted via IMA EDI, 1,893 (51.86%) flowed through to the SOP.</p> <p>This criterion represents the flow through percentage of all electronic transactions submitted via IMA EDI. This metric does not exclude those orders that were not eligible for flow through processing.</p>
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13-1-7	Order transactions submitted via IMA GUI flow through to the SOP.	Diagnostic	<p>The PID-defined standard for PO-2A is “Diagnostic.” Test results are provided as diagnostic information only.</p> <p>Of 331 order transactions submitted via IMA GUI, 167 (50.45%) flowed through to the SOP.</p> <p>This criterion represents the flow through percentage of all electronic transactions submitted via IMA GUI. This metric does not exclude those orders that were not eligible for flow through processing.</p>
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**TEST 14
Provisioning Evaluation**

Not Satisfied: 14-1-34, & 14-1-36

Of the four Test 14 criteria which are “not satisfied”, criteria 14-1-34 and 14-1-36 are most critical. Criteria 14-1-34 and 14-1-36 were “unable to determine” in the Draft Report, and have been found to be “not satisfied” in the Final Report. Criterion 14-1-34 evaluates the installation interval for Business POTS, and Criterion 14-1-36 evaluates the installation interval for UNE-P. Following the retest of E3120 and the completion of Liberty’s PID analysis, KPMG concluded that these criteria have not been satisfied. And, as identified in the Draft Report, E3086 (which was Closed/Unresolved April 22nd and opened as part of the 3120 retesting) resulted from both of these criteria. E3086 states: “Qwest did not install non-dispatch orders for the P-CLEC within a time period that is in parity with Qwest’s retail operations, as measured by the PID OP-4C. . . For the PID OP-4C, Qwest did not achieve the expected results for the Dual Test for Residential POTS and UNE-P in all three regions, and for Business POTS in the Eastern and Western region.”

Obviously the failure by Qwest to prove its ability to deliver Business POTS and UNE-P within the same installation intervals as it provides itself (parity) is a very serious concern for CLECs. UNE-P is one of the primary methods used by CLECs to compete in the local residential market. If this Test finding is not addressed and resolved, local competition will surely suffer.

JOINT CLEC COMMENTS ON OSS TEST REPORT
Docket Nos. UT-003022 and UT-003040
Exhibit A

14-1-34	Qwest meets the performance benchmark for PID OP-4C – Installation Interval for Business POTS.	Not Satisfied	<p>The PID defined standard is parity with retail service.</p> <p>In the Eastern region, Qwest took an average of 2.2 days to install 145 orders tested, as compared to 1.5 days for retail installation.</p> <p>In the Central region, Qwest took an average of 2.3 days to install 128 orders tested, as compared to 2.0 days for retail installation.</p> <p>In the Western region, Qwest took an average of 2.5 days to install 160 orders tested, as compared to 2.2 days for retail installation.</p> <p>KPMG Consulting performed a Dual Test on the initial test results, as required in Appendix G of the MTP, and determined the Qwest failed to meet the standard in the Eastern and Western regions. Exception 3086 was issued. Upon retesting, Qwest continued to fail in the Eastern region. See Exception 3086 for additional information on this issue. Exception 3086 is closed/unresolved per Qwest’s request.</p> <p>See Section V, Table V-2, for additional details.</p> <p>As stated in the MTP, version 5.2, dated 4/9/2002, “Liberty Consulting will use (the MTP) to develop and perform an audit to insure that all aspects of Qwest’s wholesale performance measures and retail parity standards are sound and in compliance with the collaboratively developed ROC PID.”</p> <p>Based on the completion of the PID audit by Liberty Consulting and the retest results of Exception 3120, KPMG Consulting concluded that Qwest did not satisfy this evaluation criterion. See Exception 3120 for additional information on these issues.</p> <p>Exception 3120 is closed.</p>
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14-1-36	Qwest meets the performance benchmark for PID OP-4C – Installation Interval for UNE-P services.	Not Satisfied	<p>The PID defined standard is parity with retail service.</p> <p>In the Eastern region, Qwest took an average of 2.8 days to install 145 orders tested, as compared to 1.5 days for retail installation.</p> <p>In the Central region, Qwest took an average of 2.6 days to install 140 orders tested, as compared to 2.1 days for retail installation.</p> <p>In the Western region, Qwest took an average of 2.9 days to install 141 orders tested, as compared to 2.2 days for retail installation.</p> <p>KPMG Consulting performed Dual Test on the initial test results, as required in Appendix G of the MTP, and determined that Qwest failed to meet the standard in all three regions.</p> <p>Exception 3086 was issued. Upon retesting, Qwest failed in all three regions. See Exception 3086 for additional information on this issue.</p> <p>Exception 3086 is closed – unresolved per Qwest’s request.</p> <p>See Section V, Table V-2, for additional details.</p> <p>As stated in the MTP, version 5.2, dated 4/9/2002, “Liberty Consulting will use (the MTP) to develop and perform an audit to insure that all aspects of Qwest’s wholesale performance measures and retail parity standards are sound and in compliance with the collaboratively developed ROC PID.”</p> <p>Based on the completion of the PID audit by Liberty Consulting and the retest results of Exception 3120, KPMG Consulting concluded that Qwest did not satisfy this evaluation criterion. See Exception 3120 for additional information on these issues.</p> <p>Exception 3120 is closed.</p>
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Unable to Determine: 14-1-44

Of the five Test 14 criteria which are “unable to determine”, criterion 14-1-44 is most significant. Criterion 14-1-44 changed from “not satisfied” in the Draft Final Report to “unable to determine” in the Final Report as a result of the retesting for E3120. E3120 was Closed/Resolved May 23rd. However, as a result of E3120’s re-testing, KPMG identified a concern with Qwest’s accurate application of its manual order handling procedures, and O3110 was opened. O3110 was Closed/Unresolved May 28th, and in addition to its impact to this criterion, it is tied to criteria 12-11-4 and 12.8-2.

<p>14-1-44</p>	<p>Qwest-produced measures of ordering and provisioning (OP) performance results for HPC transactions are consistent with KPMG Consulting-produced HPC measures.</p>	<p>Unable to Determine</p>	<p>During the course of KPMG Consulting’s comparative analysis of Qwest-produced HPC measures to KPMG Consulting-produced measures, several discrepancies were identified that affected the reporting of PID OP-4 and that could affect OP-3 and OP-6. The discrepancies included:</p> <ul style="list-style-type: none"> • Incorrect calculation of application dates and intervals; • Inappropriate exclusions; • Missing data; and • Inaccurate documentation. <p>As a result, KPMG Consulting issued Exception 3120.</p> <p>To address these issues, Qwest implemented systems fixes, conducted additional training, and revised documentation, as appropriate.</p> <p>The retest of Exception 3120 allowed KPMG Consulting to determine that Qwest fixed all of the system problems identified in this exception. However, at the conclusion of this retest, KPMG Consulting formally identified issues regarding 1) a flow through problem with eight of the retest orders in the Western Region; and 2) with human errors on three of 26 non-flow through orders and on one of eighty-four flow-through orders. As a result of discussions with Qwest and further validation by KPMG Consulting, the flow through issue was satisfactorily resolved.</p> <p>KPMG Consulting subsequently reviewed all P-CLEC non-flow through orders issued since February 1, 2002. This analysis revealed that of 109 total non-flow through orders, 60 had problems with the system algorithm, which was the basis for the Exception 3120 retest. Of the remaining 49 non-flow through orders, Qwest experienced a human error on seven. Without further retesting specifically designed to assess the impact of human error on the accuracy and completeness of Qwest’s PID reporting, KPMG Consulting is unable to conclude that Qwest satisfied this evaluation criterion. On a focus call held May 24, 2002, Qwest elected not to conduct any additional retesting.</p> <p>See Exception 3120 for additional information on these issues. Exception 3120 is closed.</p>
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TEST 16
CEMR Functional and Performance Evaluation

Test 16 Issues discussed during VTC 3:

Question with evaluation of Trouble Reports submitted via CEMR

Nearly all of the Test's Trouble Reports submitted via CEMR for UNE Loop, UNE-P, and Resale accounts were submitted on the date each of the account's migration order was scheduled to complete (based on the date provided on the order's FOC). According to discussions held during the VTC 3, Qwest treats Trouble Tickets submitted on the completion date of the order as provisioning trouble rather than as a "trouble ticket"; thereby a different process would be used for handling provisioning trouble versus a trouble ticket. WorldCom has requested during Colorado's OSS Test Workshop that KPMG identify if CEMR trouble report transactions which were submitted on the orders' due dates were processed / handled differently by Qwest from (the few) Test Trouble Report transactions which were submitted the day after the orders' due dates. While WorldCom values the Test's verification that an electronic trouble can be submitted for an order that just completed, assurance is needed that Qwest's processing of CEMR trouble tickets (rather than provisioning trouble) was evaluated and found to be satisfactory.

TEST 18
M&R End-to-End Trouble Report Processing

Not Satisfied: 18-7-1

Of the two Test 18 criteria "not satisfied", criterion 18-7-1 is most critical. Criterion 18-7-1 is associated with the Closed/Unresolved E3058. E3058: "Qwest did not successfully repair all of the POTS Resale, UNE-P, and UNE-L circuits submitted for repair." E3058 identifies a deficiency with Qwest's ability to successfully repair troubles for CLECs' customers because a 95% success rate was not achieved. CLECs are dependent upon Qwest's M&R procedures for ensuring troubles with their UNE and resale customers will be successfully resolved. Therefore this is a deficiency which must be rectified.

18-7-1	Out-of-service and service affecting wholesale UNE-P, resale, and Centrex 21 troubles that may or may not require the dispatch of a technician are successfully repaired.	Not Satisfied	<p>In the absence of a PID-defined standard, KPMG Consulting assigned a benchmark of 95% of correct repairs.</p> <p>Of 259 troubles submitted, 239 (92%) were successfully repaired.</p> <p>KPMG Consulting found that the difference between the performance result and the standard (p-value of .0372) is statistically significant. As a result of this deficiency, KPMG Consulting issued Exception 3058.</p> <p>Qwest and KPMG Consulting disagreed on both the performance standard used by KPMG Consulting to evaluate Qwest's performance, and over whether or not the troubles cited in this Exception were correctly resolved.</p> <p>Qwest asked that no additional testing be conducted. KPMG Consulting subsequently closed Exception 3058 as closed/unresolved.</p>
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**Test 23
Change Management Test**

Unable to Determine: 23-1-7, 23-1-8, 23-1-9, 23-2-2, 23-2-7, 23-2-8, & 23-2-9

Following the completion of retesting on May 17th, criteria 23-1-7 and 23-1-9 remain “unable to determine” and their associated E3110 was Closed/Inconclusive May 21st. Despite the additional retesting, KPMG did not have enough evidence or observations to conclude that E3110 had been resolved or that criteria 23-1-7 or 23-1-9 are satisfied.

Similarly, criterion 23-1-8 remains “unable to determine” and the associated exception-E3111-is Closed/Inconclusive. KPMG states that “Due to the test schedule, KPMG Consulting was not able to observe the prioritization of a major software release in accordance with the documented process. Additionally, KPMG Consulting was unable to observe use of SCR.P.”

Criteria 23-2-2, 23-2-7, 23-2-8, & 23-2-9 cannot be determined because Qwest and the CLECs are still in process of finalizing aspects of the Product/Process portion of the CMP. In the comments for criterion 23-2-2, KPMG states: “Due to continuing Qwest-CLEC negotiations in CMP Redesign, the Product/Process CMP is not fully implemented or documented.” And in the comments for criterion 23-2-7, KPMG states: “Qwest had not fully implemented Product/Process CMP at the conclusion of the Qwest OSS Evaluation.” The ongoing finalization of the Product/Process portion part of the CMP also led to E3094 being Closed/Unresolved, again, after retesting. E3094 is associated with criterion 23-2-8 and was Closed/Unresolved May 21st. In summary, as stated in KPMG’s comments: “Due to a limited sample size and representation of only two categories of Qwest initiated Product/Process changes during the retest period, KPMG Consulting was unable to verify that the process had been fully implemented, and closed Exception 3094 unresolved.”

The seven “unable to determine” Change Management test criteria point to the fact that it is premature to draw conclusions for each the Systems, Product, and Process aspects Qwest’s CMP. Change Management procedures for systems, products, and processes provide a framework and guidelines for how changes to systems, products, and processes will be managed and implemented. Each aspect (system, product, and process) is interdependent and can be equally impacting to a CLEC’s business. Therefore all aspects of Qwest’s CMP are critical to ensuring successful and fair business relationships between Qwest and CLECs.

23-1-7	Procedures and systems are in place to track information such as descriptions of proposed changes, key notification dates, and change status.	Unable to Determine	The Systems CMP has procedures and systems to track CRs prior to change implementation. However, KPMG Consulting was not able to validate the procedures and systems for tracking release documentation requirements. Qwest utilizes a Microsoft Access database to track Qwest- and CLEC-initiated Systems CRs. The interactive status report generated from this database is available on the CMP Web site, and is included in the monthly CMP distribution package. The draft CMP document specifies that Qwest provide CLECs with a list of changes scheduled for implementation in an upcoming software release. Qwest
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			<p>provides CLECs with release documentation requirements in accordance with the intervals in the draft CMP document. If Qwest determines that it will not be able to implement a CR as scheduled, Qwest will discuss options at the next monthly CMP meeting.</p> <p>KPMG Consulting was not able to verify Qwest's compliance with the complete notification processes.</p> <p>During testing, KPMG Consulting identified that Qwest lacked proper tools to track notifications, and to ensure that information was distributed to CLECs in accordance with the intervals specified in the draft CMP document. KPMG Consulting issued Exception 3110.</p> <p>Qwest subsequently provided KPMG Consulting with documents describing Qwest's internal procedures that individual software release teams use to comply with CMP requirements. However, Qwest confirmed that change management staff did not have a centralized mechanism to track and ensure that documentation release intervals for all upcoming software releases were followed.</p> <p>Although the documentation provided sufficient evidence that tracking procedures exist, the information was not sufficient for KPMG Consulting to determine that Qwest adheres to the documented process.</p> <p>Near the end of the retest, Qwest provided a confidential database report method for tracking IT and PMO milestones, including CMP milestones, across a variety of releases. However, KPMG Consulting did not receive any supporting documentation, and did not perform an on site review of the database.</p> <p>KPMG Consulting closed Exception 3110 as inconclusive. See Exception 3110 for additional information on this issue.</p>
23-1-8	Criteria are defined for the prioritization system and for severity coding.	Unable to Determine	<p>The Systems CMP defines the criteria for the prioritization of CRs and for severity coding of trouble tickets. KPMG Consulting was not able to observe the prioritization of a major release in accordance with the documented process. The Systems CMP requires both Qwest</p>

		<p>and CLECs to participate in the prioritization process. A prioritization vote is necessary when the available capacity of an OSS interface or test environment release is unable to accommodate all outstanding CRs. Qwest and CLECs jointly rank the priority of Qwest- and CLEC-originated CRs for that particular software release by using a quantitative evaluation method.</p> <p>Regulatory and industry guideline changes, however, are subject to the prioritization process only if the mandated or recommended implementation dates can be met by following the usual procedure. Another exception to the prioritization process takes the form of a Special Change Request Process (SCRP), utilized by either Qwest or CLECs, to financially sponsor a CR and bypass the prioritization process.</p> <p>The prioritization process for IMA 10.0 was the first time that Qwest had submitted Qwest-originated CRs to CMP. Due to delays in the deployment schedule, Qwest conducted the prioritization process vote for IMA 10.0 twice, first in August 2001, and again in October 2001.</p> <p>The second IMA 10.0 prioritization process included five Qwest-originated PID/PAP-related CRs. Qwest classified these CRs as regulatory changes and bypassed the CR ranking vote. CLECs subsequently disputed this classification, objected to the preferential treatment of these Qwest-initiated CRs, and requested that Qwest reallocate resources to implement other prioritized CRs. Qwest proceeded to schedule the implementation of four of these CRs in IMA 10.0 over CLEC objections.</p> <p>The prioritization for IMA 10.0 was also the first time that the process included the concept of CR packaging options. After the initial prioritization vote had taken place, Qwest IT personnel performed detailed analysis of some of the prioritized CRs, and recommended that certain CRs be implemented together so that Qwest IT would realize cost-savings from identified system and functional dependencies.</p> <p>Qwest subsequently informed CLECs of the recommended CR packaging options, and conducted another vote to decide which CR packaging options should be</p>
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			<p>included in the upcoming software release. KPMG Consulting recognizes that the prioritization for IMA 10.0, and IMA 11.0, took place when Qwest and CLECs were at impasse over the definition of regulatory change. Qwest conducted CR ranking for IMA 11.0 in February 2002, and included two PID/PAP-related CRs as regulatory changes over CLEC objections. The Colorado Public Utilities Commission decided on March 13, 2002 that regulatory changes should exclude PID/PAP-related changes.</p> <p>Due to the test schedule, KPMG Consulting was not able to observe the prioritization of a major software release in accordance with the documented process. Additionally, KPMG Consulting was unable to observe use of SCRP.</p> <p>With respect to production support, the draft CMP document defines four severity levels, and the related notification and resolution intervals for production support issues. Qwest implements patch releases for Severity 1 or 2 tickets, but advises CLECs to issue CRs via CMP to resolve Severity 3 or 4 issues. The draft CMP document specifies that WSHD staff communicate to CLECs about the severity assignment of a trouble ticket.</p> <p>KPMG Consulting monitored System Event Notifications during the testing period, and confirmed that the notifications contained severity information.</p> <p>The Systems CMP employs a different process flow to accommodate changes that either Qwest or a CLEC requests be implemented on an expedited basis. The Exception Process remains subject to continuing Qwest-CLEC negotiation in CMP Redesign.</p> <p>During testing, KPMG Consulting identified that Qwest Systems CMP lacked guidelines for prioritizing CLEC-initiated system CRs, and criteria for developing the scope of an OSS Interface Release Package. KPMG Consulting issued Exception 3111.</p> <p>Qwest subsequently developed internal M&P documentation that contains information about elements that constitute level of effort (LOE) and capacity information, as well as the process Qwest</p>
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		<p>staff follows in determining release packaging options. The draft CMP document states that Qwest provides CLECs with LOE and release capacity information, in terms of person hours, during the prioritization process.</p> <p>KPMG Consulting observed that Qwest and CLECs had not finalized discussions about the prioritization process before prioritization for IMA Release 10.0 occurred. KPMG Consulting was not able to evaluate adherence to the process during this test and closed Exception 3111 as inconclusive. See Exception 3111 for additional information on this issue.</p> <p>Also during initial testing, HPC formally identified that Qwest did not publish the defects and implementation dates identified during the Interoperability or Certification testing portion of the EDI implementation process, and that Qwest assigned severity rankings to the issues without input from CLECs.</p> <p>In response, Qwest extended production support functions to include the 30-day testing window prior to the EDI implementation process. This issue was subsequently closed.</p>
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<p>23-2-2</p>	<p>The change management process is in place and documented.</p>	<p>Unable to Determine</p>	<p>Due to continuing Qwest-CLEC negotiations in CMP Redesign, the Product/Process CMP is not fully implemented or documented.</p> <p>At the conclusion of the Qwest OSS Evaluation, KPMG Consulting observed that Qwest and CLECs continued discussion about relevant issues in CMP Redesign, including:</p> <ul style="list-style-type: none"> • The process for postponing or stopping a Qwest-initiated Product/Process change; and • The Exception Process. <p>Qwest will finalize the draft CMP document after it has reached agreement with CLECs on the remaining issues.</p> <p>In KPMG Consulting’s professional opinion, the draft CMP document does not include all of the components that constitute a well-formed and complete Product/Process CMP. Although Qwest and CLECs have made significant progress in CMP Redesign, the parties have not completed discussions about Product/Process CMP, and have not documented all activities within CMP. For example, Redesign discussions continue for the definition of a CR Postponement Request and the Exception process. The CMP Redesign Process itself is scheduled through June 2002.</p>
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23-2-7	Procedures and systems are in place to track information such as descriptions of proposed changes, key notification dates, and change status.	Unable to Determine	<p>Qwest had not fully implemented Product/Process CMP at the conclusion of the Qwest OSS Evaluation. KPMG Consulting was unable to confirm that Qwest has procedures and systems to track all proposed Product/Process changes.</p> <p>Qwest utilizes a Microsoft Access database to track CLEC-initiated Product/Process CRs and Qwest-initiated Level 4 changes. The interactive status report generated from this database is available on the CMP Web site, and is included in the monthly CMP distribution package.</p> <p>Qwest utilizes a Web-based Customer Notification Letter Archive (CNLA), available at the following Web site: http://www.qwest.com/wholesale/notices/cnla/, for CLECs to search and retrieve past notification. Although this mechanism provides external reporting for Qwest notifications, it does not serve as an internal tracking system for proposed Product/Process changes.</p>
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<p>23-2-8</p>	<p>Criteria are defined for the prioritization system and for severity coding.</p>	<p>Unable to Determine</p>	<p>The Product/Process CMP defines the criteria for categorizing Qwest-initiated changes on the basis of perceived impact to CLEC business operations. Qwest had not fully implemented Product/Process CMP at the conclusion of the Qwest OSS Evaluation. KPMG Consulting, therefore, was unable to observe the complete implementation of this process.</p> <p>The draft CMP document describes the initiation, evaluation, and notification of Qwest- and CLEC-initiated Product/Process CRs. The document defines five categories of Qwest-initiated Product/Process changes (Levels 0 to 4), with each higher level representing increasing impact to CLEC business operations. At the conclusion of the Qwest OSS Evaluation, Qwest had just begun to categorize all of its Product/Process changes in accordance with the documented process. KPMG Consulting, therefore, was unable to observe sufficient evidence to verify that the process had been fully implemented. The Product/Process CMP employs a different process flow to accommodate changes that either Qwest or a CLEC requests be implemented on an expedited basis. The Exception Process remains subject to ongoing Qwest-CLEC negotiation in CMP Redesign.</p> <p>During testing, KPMG Consulting observed that Qwest implemented a desired process change over CLEC objections. KPMG Consulting issued Exception 3094.</p> <p>In response to Exception 3094, Qwest indicated that Qwest and CLECs disagreed about the process governing Qwest-initiated Product/Process changes.</p> <p>In April 2002, Qwest and CLECs agreed to the process for Qwest-initiated Product/Process changes. During retesting, Qwest clarified that not all Qwest-initiated changes issued via CMP notifications in April and May 2002 could be implemented under the new process.</p> <p>Due to a limited sample size and representation of only two categories of Qwest initiated Product/Process changes during the retest period, KPMG Consulting was unable to verify that the process had been fully</p>
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			implemented, and closed Exception 3094 unresolved. See Exception 3094 for additional information on this issue.
23-2-9	Qwest complies with notification intervals and documentation release requirements.	Unable to Determine	<p>Because Qwest had not fully implemented the Product/Process CMP, KPMG Consulting was unable to observe adherence to notification intervals and documentation release requirements for Qwest-initiated changes.</p> <p>The draft CMP document defines five categories of Qwest-initiated Product/Process changes (Levels 0 to 4), with each higher level representing increasing impact to CLEC business operations. The document also specifies the comment and implementation intervals for each of the five categories. However, KPMG Consulting was not able to validate compliance with the documented process.</p>

TEST 24.6
OSS Interface Development Review

Not Satisfied: 24.6-1-8

Of the two Test 24.6 criteria “not satisfied”, criterion 24.6-1-8 is most critical. Criterion 24.6-1-8 produced two Closed/Unresolved exceptions: E3077 and E3095 and represents a major flaw with Qwest’s OSS. Per KPMG’s comments: “KPMG Consulting reviewed SATE documentation and identified that SATE transaction responses are manually generated, and that the environment does not support flow-through transactions. As a result, KPMG Consulting issued Exception 3077.” Also per KPMG’s comments: KPMG Consulting identified problems related to adding functionality to SATE in Exception 3095. The issues raised included the process for adding new IMA products for testing as well as adding existing products not currently supported in SATE.”

The lack of a functional test environment for Qwest’s IMA EDI ordering interface will, undoubtedly, directly impact a CLEC’s ability to effectively develop and maintain an EDI ordering interface with Qwest. E3077 is most critical because it identifies issues with how CLEC orders are processed in the test environment. And though Qwest has implemented its VICKI system in SATE to provide flow through responses, there has been no evaluation to ensure that VICKI sufficiently provides order handling as is used in production.

24.6-1-8	A functional test environment is made available to customers for all supported interfaces.	Not Satisfied	<p>A functional test environment is not made available to customers for all supported interfaces.</p> <p>Prior to August 2001, Qwest supported only its Interop test environment for CLECs testing an EDI interface. KPMG Consulting identified Interop deficiencies in Exception 3029:</p> <ul style="list-style-type: none"> • Interop requires CLECs to use valid
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			<p>production data in their test cases;</p> <ul style="list-style-type: none"> • Responses to the test cases are generated manually as opposed to automatically generating production system-like responses; and • Interop has no flow-through capability as does the Production Environment. <p>Qwest responded that it was devoting its testing resources to developing SATE, and that no further enhancements would be made to Interop. Qwest revised the <i>EDI Implementation Guidelines for IMA</i>, so that it now provides more detailed information on the pros and cons of using Interop vs. SATE or a combination of both environments. Exception 3029 is closed.</p> <p>In August 2001, Qwest introduced SATE as a result of a CR submitted through Qwest’s Change Management Process (CMP) by a CLEC. SATE is separate from Qwest’s production systems.</p> <p>KPMG Consulting reviewed SATE documentation and identified that SATE transaction responses are manually generated, and that the environment does not support flow-through transactions. As a result, KPMG Consulting issued Exception 3077.</p> <p>In its response, Qwest requested that KPMG Consulting close Exception 3077 without waiting for SATE enhancements to be implemented, and subsequent retest verification activities to be completed. Exception 3077 is closed/unresolved.</p> <p>KPMG Consulting formally identified that Qwest did not supply CLECs with sample EDI transactions for the various types of test cases available.</p> <p>Qwest released the <i>Populated X12 Mapping Examples – IMA EDI 9.0 Release</i> document through the CMP Release Notification process.</p> <p>KPMG Consulting verified that CLECs were supplied with sample EDI transactions, and the issue was resolved.</p> <p>KPMG Consulting identified problems related to adding functionality to SATE in Exception 3095. The issues raised included the process for adding new IMA products for testing as well as adding existing products not currently supported in SATE.</p> <p>In its response, Qwest requested that KPMG Consulting close Exception 3095 without waiting for SATE enhancements</p>
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			<p>to be implemented, and subsequent retest verification activities to be completed. Exception 3095 is closed/unresolved.</p> <p>The P-CLEC's testing for the Qwest OSS Evaluation was limited to Interop. During its Interop testing experience, the P-CLEC identified certain issues with the Interoperability Testing environment, including:</p> <ul style="list-style-type: none">• Adequate resources were not available for reviewing and clarifying test scenario templates; and• Discrepancies between actual and expected responses. <p>These issues were subsequently resolved. Qwest does not require carrier-to-carrier testing for IMA GUI.</p>
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