| Test Number | Criterion | Evaluation Criteria | Comments |
|----------------|-----------|--|---|
| 12 | 12-11-2 | Product and feature offerings are comparable for both retail and wholesale services. | KPMG Consulting considered CLEC input in the evaluation of this criterion. However, CLEC comments were not the only source for data. Documentation reviews, Qwest interviews, Qwest observations and CLEC observations were also considered in the evaluation. |
| 12 | 12-11-3 | Pre–Order and Order capabilities are functionally equivalent for both retail and wholesale services. | same as 12-11-2 |
| 12.7 | 12.7-1-1 | The end-user information that is required prior to the submission of a loop qualification is the same for wholesale and retail orders. | KPMG Consulting considered CLEC input in the evaluation of this criterion. However CLEC comments were not the only source for data. Documentation reviews, Qwest interviews, Qwest observations and CLEC observations were also considered in the evaluation. |
| 12.7 | 12.7-1-2 | The loop qualification query process is consistent for retail and wholesale customers. | same as 12.7-1-1 |
| 12.7 | 12.7-1-3 | Processes and procedures are defined for addressing errors regarding loop qualifications in the retail and wholesale environments. | same as 12.7-1-1 |
| 12.7 | 12.7-1-4 | The internal process flow used for loop qualification is consistent for retail and wholesale customers. | same as 12.7-1-1 |
| 12.7 | 12.7-1-5 | Qwest contact information is readily available for retail and wholesale customers. | same as 12.7-1-1 |
| 12.7 | 12.7-1-6 | The customer receives confirmation of the completion of a loop qualification, or can access the status of loop qualifications. | same as 12.7-1-1 |
| 12.7 | 12.7-1-7 | Systems and processes are in place to allow wholesale and retail loop qualification queries to be performed using the customer address. | same as 12.7-1-1 |
| 12.7 | 12.7-1-8 | Loop qualification response types that are provided are consistent between retail and wholesale customers. | same as 12.7-1-1 |
| 12.7 | 12.7-1-9 | The escalation process for loop qualifications is consistent for retail and wholesale customers. | same as 12.7-1-1 |
| 12.7 | 12.7-1-11 | Loop qualification performance measurement processes are consistent for retail and wholesale operations. | same as 12.7-1-1 |

| 14 | 14-1-6 | Qwest provisions High Capacity circuits by adhering to documented method and procedure tasks. | KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and that the loop characteristics met the technical specifications for the intended service. One of the three CLEC participated in this test. |
|----|---------|--|--|
| 14 | 14-1-7 | Qwest provisions Loop Migrations (Hot Cuts) by adhering to documented method and procedure tasks. | KPMG testers independently verified that the Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. One of the three CLEC participated in this test. |
| 14 | 14-1-15 | Qwest provisions Analog Loops by adhering to documented method and procedure tasks. | KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. Two of the three CLEC participated in this test. |
| 14 | 14-1-18 | Qwest meets the performance benchmark for PID OP-3A, B, D, & E – Installation Commitments Met for All Products. | Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from two of the three CLECs. |
| 14 | 14-1-22 | Qwest meets the performance benchmark for PID OP- 8B – Number Portability Timeliness for LNP Loops with Coordination. | KPMG testers independently verified that LNP Loops with Coordination were installed on committed due date/time. One of the three CLECs provided facilities. Orders were issued by the P- CLEC on behalf of the participating CLEC. |
| 14 | 14-1-23 | Qwest meets the performance benchmark for PID OP- 8C – Number Portability Timeliness for LNP Loops without Coordination. | KPMG testers independently verified that LNP Loops without Coordination were installed on committed due date/time. Eschelon was one of several CLECs that provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC. |
| 14 | 14-1-24 | Qwest meets the performance benchmark for PID OP-13A – Coordinated Cuts on Time – Unbundled Loop. | KPMG testers independently verified that Coordinated Cuts of Unbundled Loops were installed on the committed due date/time. One of the three CLECs provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC. |

| 14 | 14-1-26 | Qwest meets the parity performance requirements for PID OP-3A, B, D, & E – Installation Commitments Met for DS1 Loops. | KPMG testers independently verified that DS1 Loops were installed on the committed due date/time. One of the three CLECs participated in this evaluation. The PID calculation included commercial observations and test bed accounts. |
|----|---------|---|---|
| 14 | 14-1-28 | Qwest meets the parity performance requirements for PID OP-4 A, B, D, & E – Installation Interval for DS1 Loops | KPMG testers independently verified that DS1 Loops were installed on the committed due date/time. One of the three CLECs participated in this evaluation. The PID calculation included commercial observations and test bed accounts. |
| 14 | 14-1-29 | Qwest meets the parity performance requirements for PID OP-5 – New Service Installation Quality All Products. | KPMG Consulting used data from Qwest on trouble history logs for all three of the CLECs along with several other participating CLECs. |
| 18 | 18-1-1 | Out-of-service trouble reports on wholesale services specified in PID MR-3 that require the dispatch of a technician are cleared within 24 hours. | KPMG observed employees from one CLEC initiate trouble reports and examined the corresponding Qwest trouble ticket. Results were incorporated into the calculation of this PID. |
| 18 | 18-1-2 | Out-of-Service trouble reports on wholesale services specified in PID MR-3 that do not require the dispatch of a technician are cleared within the defined interval. | same as 18-1-2 |
| 18 | 18-2-1 | Out-of-Service and service-affecting trouble reports on wholesale services specified in PID MR-4 that require the dispatch of a technician are cleared within 48 hours. | same as 18-1-2 |
| 18 | 18-2-2 | Out-of-Service and service-affecting trouble reports on wholesale services specified in PID MR-4 that do not require the dispatch of a technician are cleared within 48 hours. | same as 18-1-2 |
| 18 | 18-4-1 | The mean time to restore wholesale services specified in PID MR-6 that require the dispatch of a technician is equal to or less than retail services. | same as 18-1-2 |
| 18 | 18-4-2 | The mean time to restore wholesale services specified in PID MR-6 that do not require the dispatch of a technician is equal to or less than retail services. | same as 18-1-2 |
| 18 | 18-5-1 | Repair of wholesale services specified in PID MR-9 that require the dispatch of a technician are made by the appointment date and time. | same as 18-1-2 |

| 18 | 18-5-2 | Repair of wholesale services specified in PID MR-9 that do not require the dispatch of a technician are made by the appointment date and time. | same as 18-1-2 |
|------|-----------|---|---|
| 24.6 | 24.6-2-4 | Interface specifications that define applicable business rules, data formats/definitions and transmission protocols are made available to customers. | KPMG Consulting conducted interviews with one CLEC to understand any issues and concerns with Qwest's MEDIACC EB-TA interface development processes. Information obtained during interviews was just one of several data points used in the analysis and determination of results. |
| 24.6 | 24.6-2-5 | On-call customer support for interface specifications is provided. | same as 24.6-2-4 |
| 24.6 | 24.6-2-7 | Qwest has a documented methodology for conducting carrier-to-carrier testing with customers seeking to interconnect. | same as 24.6-2-4 |
| 24.6 | 24.6-2-8 | A functional test environment is made available to customers for all supported interfaces. | same as 24.6-2-4 |
| 24.6 | 24.6-2-9 | Carrier-to-carrier test environments are available and segregated from Qwest production and development environments. | same as 24.6-2-4 |
| 24.6 | 24.6-2-10 | On-call customer support for interface testing is provided. | same as 24.6-2-4 |
| 24.6 | 24.6-2-11 | Carriers are provided with documented specifications for active test environments. | same as 24.6-2-4 |
| 24.6 | 24.6-2-12 | Active test environments are managed to version control. Carriers are notified before changes are made to active test environments. | same as 24.6-2-4 |
| 24.6 | 24.6-2-13 | Procedures are defined to log software "bugs," errors, and omissions in specifications and other issues discovered during carrier-to-carrier testing. | same as 24.6-2-4 |
| 24.6 | 24.6-2-16 | Business rules and software change tracking tools exist, are updated, and are shared with customers. | same as 24.6-2-4 |
| 24.6 | 24.6-2-20 | Defects and required changes are identified and tracked during pre-production testing. | same as 24.6-2-4 |

JOINT CLEC COMMENTS ON OSS TEST REPORT Docket Nos. UT-003022 and UT-003040 Exhibit B Substantial Reliance, Page 5

Test Number Criterion **Evaluation Criteria Comments** 14 Qwest provisions ADSL Line Sharing circuits by KPMG testers independently verified that Qwest 14-1-9 adhering to documented method and procedure technicians adhered to the documented methods tasks. and procedures and the loop characteristics met the technical specifications for the intended service. KPMG testers primarily observed circuits from one of the three CLECs. Resale and UNE-P data used in this PID calculation Qwest meets the performance benchmark for PID 14 14-1-21 OP-4A, B, D, & E – Installation Interval for All was primarily gathered from one of the three CLECs. Data for other products was gathered from Products. two of the three as well as other participating CLECs. Resale and UNE-P data used in this PID calculation 14 14-1-25 Qwest meets the parity performance requirements for PID OP-3A, B, D, & E – Installation was primarily gathered from one of the three Commitments Met for All Products. CLECs. Data for other products was gathered from two of the three as well as other participating CLECs. Resale and UNE-P data used in this PID calculation 14 14-1-27 Qwest meets the parity performance requirements was primarily gathered from one of the three for PID OP-4 A, B, D, & E – Installation Interval for CLECs. Data for other products was gathered from All Products. all three CLECs as well as other participating CLECs.

Substantial Reliance

JOINT CLEC COMMENTS ON OSS TEST REPORT Docket Nos. UT-003022 and UT-003040 Exhibit B Other Reliance, Page 6

| Test Number | Criterion | Evaluation Criteria | Comments |
|----------------|-----------|---------------------|--|
| 18.7 | N/A | None | KPMG Consulting conducted interviews with one of the three CLECs as well as two others to gather feedback pertaining to Qwest M&R work center interactions and experiences. KPMG Consulting used the information learned to place appropriate focus on those M&R work center process areas for which CLECs reported negative experiences |
| 18.8 | N/A | None | same as 18.7 |
| 23 | N/A | None | KPMG Consulting conducted interviews with one of the three CLECs to understand Change Management processes and potential issues. None of the information obtained during the interviews was used to support conclusions reflected in the final report. |
| 24.5 | N/A | None | KPMG Consulting conducted interviews with one of the three CLECs to understand CLEC training issues and concerns. None of the information obtained during the interviews was used to support conclusions reflected in the final report. |

Other Reliance