

WCOM Questions on KPMG's "CLEC Participation Review" discussed in the 5/9/02 ROC TAG Meeting:

- a) Please specify the actual number of orders used for the calculations of PID OP-4A, B, D, & E for meeting the performance benchmarks and for meeting the parity performance requirements that was gathered from each of the three CLECs referenced in the KPMG review.

Answer:

For Parity orders (all products) – 231
For Benchmark orders (all products) - 455

- b) Please provide the total number of orders used for the calculations of PID OP-4A, B, D, & E for meeting the performance benchmarks and for meeting the parity performance requirements.

Answer:

Per the ROC final report, the total number of commercial observations that are associated with this PID were 558 transactions that were applied to the benchmark standard, and 235 that were applied to the parity standard.

- c) Please specify the actual number of orders used for the calculation of PID OP-3A, B, D, & E for meeting the parity performance requirements, that was gathered from each of the three CLECs referenced in the KPMG review.

Answer:

For Parity orders (all products) – 231

- d) Please provide the total number of orders used for the calculation of PID OP-3A, B, D, & E for meeting the parity performance requirements.

Answer:

Per the ROC final report, there were a total of 235 observations associated with the parity standard of this PID.

- e) Was the one CLEC (of the three CLECs) whose Resale and UNE-P data was "primarily" gathered for the calculation of PIDs OP-4A, B, D, & E and OP3A, B, D, & E the same CLEC?

Answer:

Yes

- f) Where KPMG states that data was “primarily gathered from one of the three CLECs”, please provide a confidential response with the name of that CLEC.

Answer:

Considering a CLEC’s participation in this test is confidential, KPMG will not provide this information in this forum.

- g) What differences exist between how PID OP-3A, B, D, & E was calculated for performance benchmarks and how PID OP-3A, B, D, & E was calculated for parity performance requirements that caused KPMG to rate the CLEC impact on these PID calculations differently?

(Background: KPMG rated these CLECs’ impact as “substantial reliance” for parity performance requirements, and as “partial reliance” for performance benchmarks; though the comments provided for each evaluation criteria are identical.)

Answer:

No “difference exists” between how these PIDs were calculated. These PIDs were calculated per the Qwest documentation. However, as the answer to question “a” shows, the CLECs reference in KPMG Consulting’s report accounted for practically 100% of the parity observations, whereas for the benchmark standard KPMG Consulting was able to obtain data from other participating CLECs.

- h) What differences exist between how these CLECs impacted KPMG’s evaluation of Qwest’s adherence to documented M&P tasks for provisioning of ADSL Line Sharing circuits, and KPMG’s evaluation of Qwest’s adherence to documented M&P tasks for provisioning High Capacity circuits, Hot Cuts, and Analog Loops?

(Background: KPMG rated these CLECs’ impact as “substantial reliance” for its evaluation of adherence to M&P tasks for provisioning ADSL Line Sharing circuits and as “partial reliance” for its evaluation of the other aforementioned services; though the comments for each evaluation criteria are similar.)

Answer:

In the case of ADSL Line Sharing, the vast majority of our observations came from one or more of the three CLECs. In the other three cases, we received data from other CLECs in addition to the data received from the three CLECs in question.

- i) Please specify what Resale and UNE-P data input was gathered from any of the three CLECs which related to Test sub-process “New Service Adds” for Test Evaluation Criterion 14-1-21 and 14-1-25.

(Background: Per KPMG's Draft Final Report, Section 2.3, Table 14-4 "Test Target Cross-Reference", Test Criterion 14-1-21, 14-1-25 relate to Test sub-processes "new service adds" and "inter-office facilities provisioning".)

Answer:

The data elements KPMG Consulting gathered from the participating CLECs were:

- Application date
- Confirmed due date
- Completion date

However, it is important to note that due to significant data integrity problems KPMG Consulting had with the information it received from the participating CLEC(s), all of the data elements were subsequently reconciled with Qwest.

- j) What percentage of the total UNE-P installation transactions used by KPMG in each of the states came from each of the three CLECs referenced in the KPMG review?

Answer:

As indicated in the parity answer (question "a") practically 100% of the resale/UNE-P observations came from one of the CLECs referenced in KPMG's report.

- k) Please further clarify the definition of "substantial reliance". When KPMG states that "CLEC representations, information or data was used as the PRIMARY data point", does Primary mean that CLEC data from the three CLECs in question made up, for example, 50% of the data, 75% of the data, or 100% of the data?

Answer:

100% of the data KPMG Consulting gathered when conducting commercial observations came from the participating CLECs. However, as noted in question "i", if that data is suspect KPMG Consulting will reconcile the data with Qwest before using the data.

- l) In its professional opinion, does KPMG believe that the tests under the "Substantial Reliance" category should be rerun with data that is not provided from any of the CLECs that have been identified by the various PUCs as being under investigation for signing "secret agreements" with Qwest?

Answer:

KPMG Consulting is not aware of any facts that call into question the integrity of the data we collected and analyzed in reaching the conclusions reached in our report. Until such time as it can be demonstrated that the data we relied upon is not accurate, we see no reason to conduct further testing in this area.