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EXCEPTION 3110 – SUPPLEMENTAL DISPOSITION REPORT
Qwest OSS Evaluation

Initial Release Date: January 24, 2002
First Response Date: March 13, 2002
Second Response Date: March 27, 2002
Disposition Report Date: April 2, 2002
Third Response Date: May 7, 2002
Supplemental Disposition Report Date: May 21, 2002

SUPPLEMENTAL EXCEPTION DISPOSITION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Review, MTP Test 23.

Exception:

Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.

Summary of Exception:

Qwest utilizes the Mailout Notification System to distribute information that pertains to CLECs' business operations. These notifications cover a wide range of topics including documentation updates, new product offerings, training availability, OSS planned outages, Qwest-CLEC meeting notices, Qwest's responses to CLEC-initiated change requests, and notices specifically concerning the Qwest Change Management Process (CMP). These distributions are critical to allow CLECs to make informed decisions about their business operations, as well as to maintain the Qwest-CLEC business relationship. CLEC representatives rely on accurate email headlines and timely notices to redistribute the emails within their respective organizations.

KPMG Consulting reviewed a total of 115 CLEC notifications that Qwest distributed through the Mailout Notification System in December 2001, and identified the following six issues:

- (1) Discrepancies between document dates and actual distribution dates indicated Qwest had not distributed some notifications in a timely manner;
- (2) Inaccurate description of notification in an email headline;
- (3) Late notice of system changes;
- (4) Inadequate interval for announcing planned outages;
- (5) Inadequate information about cost docket rate changes;
- (6) Lack of adequate tracking and verification of documentation intervals.

Summary of Qwest's Initial and Supplemental Responses:

Qwest's responses indicated that the following remedies were implemented to address issues identified in this Exception:

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- (1) The Qwest Notification Department implemented a log-in process to ensure that all documents are distributed in a timely manner.
- (2) Qwest made corrections as soon as it had detected that an inaccurate description of notification had been applied – Qwest distributed a corrected notification with the appropriate headline shortly after the original email notification.
- (3) Qwest implemented a notification process and corresponding set of intervals to provide CLECs with advance notice of bill rate validation activities. With respect to three other late notices of system changes, Qwest stated that it was unable to provide CLECs with advance notices prior to error resolution.
- (4) In accordance with results from CMP Redesign discussion, Qwest implemented the 48-hour interval for planned outages effective February 1, 2002.
- (5) Starting March 1, 2002, Qwest implemented a new notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes.
- (6) Qwest implemented a Web-based depository on January 31, 2002 so that CLECs could search and retrieve past notifications. Qwest also confirmed that although it does not employ a centralized database or other mechanism for tracking adherence to established CMP intervals, it does have documented procedures and project plans for tracking CMP deliverables for each type of interface.

In relation to the remaining issue (6), “lack of adequate tracking and verification of documentation intervals”, Qwest provided two examples of tools used to track and verify notification intervals for systems-related CMP changes.

On April 25, 2002, Qwest requested that KPMG Consulting reopen this Exception and observe adherence to the documentation release intervals. Qwest subsequently clarified that it was able to manage all the required OSS Interface notifications since April 4, 2002 in accordance with the documented CMP notification timelines. Qwest also provided a spreadsheet showing Qwest’s recent CMP notification results based on the OSS Release Calendar posted to the Qwest Wholesale CMP Website.

In response to issues KPMG Consulting raised following reopening this Exception, Qwest was asked to clarify the relationship between changes to the calendar and adherence to established intervals. Qwest stated that release dates posted to the OSS Release Calendar are considered “target dates” that Qwest occasionally changes due to various issues that arise during the software development cycles. When the target implementation date changes on the OSS Release Calendar, Qwest reported that it will modify the applicable notification dates in the OSS Release Calendar based on the intervals required by CMP.

KPMG Consulting’s Supplemental Disposition Report (05/21/02):

Summary of KPMG Consulting’s Retest Activities:

Exception 3110 identified six issues with the notifications that Qwest distributes to the CLEC community. KPMG Consulting conducted retesting of Qwest notifications with respect to issues

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(1) and (4). KPMG Consulting reviewed Qwest's responses along with substantiating material, and confirmed that Qwest had taken steps to address issue (2) and (5). Issue (3) relates to advance intervals for notifying CLECs about unanticipated system fixes, patches, or unplanned outages. KPMG Consulting determined that this issue falls within the scope of Exception 3112.

KPMG Consulting reviewed a total of 278 notifications that Qwest distributed between February 1, 2002 and March 22, 2002 and identified one incident in which Qwest experienced a delay of two days between the time the document was prepared and actual distribution. Among the reviewed notifications, KPMG Consulting identified three planned outage notices, all of which met the advanced notice interval requirement. KPMG Consulting was satisfied with retest results and considered issues (1) through (5) resolved.

Issue #6 Lack of Adequate Tracking and Verification

Qwest confirmed that CMP managers do not employ a centralized mechanism to track and ensure that documentation release intervals are being followed for all upcoming software releases. KPMG Consulting reviewed Qwest internal process documents and verified that software, product, and process documentation teams have procedures to prepare documents and distribute them in accordance with the intervals specified in the draft CMP document. Due to the recent implementation of these process changes, KPMG Consulting was unable to observe adherence to the documented process for notification interval management and closed Exception 3110 on April 2, 2002, as inconclusive.

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 Calendar¹ to include this previously scheduled version of IABS in the list of interfaces for "No Planned Releases" section of the document.

¹ The OSS Release Calendar is located at <http://www.qwest.com/wholesale/cmp/osscalendar.html>.

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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.