



<i>Test Vendor ID:</i>	EXP 3110
<i>Qwest Internal Tracking ID:</i>	TI 825
<i>Observation/Exception Title:</i>	Mailout Notification System
<i>Test Type/Domain:</i>	Test 23 - Change Management
<i>Date Qwest Received:</i>	01/25/2002
<i>Initial Response Date:</i>	02/26/2002
<i>Supplemental Response Date:</i>	03/05/2002
<i>2nd Supplemental Response Date:</i>	03/19/2002
<i>3^d Supplemental Response Date:</i>	03/22/2002
<i>4th Supplemental Response Date:</i>	04/01/2002
<i>5th Supplemental Response Date:</i>	04/25/2002
<i>6th Supplemental Response Date:</i>	05/02/2002
<i>7th Supplemental Response Date:</i>	05/10/2002

Test Incident Summary:

An exception has been identified as a result of 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.

Background:

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, Quest'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.¹

Issues:

¹ KPMG Consulting observed that, in response to CLECs' request during the CMP Redesign effort, Qwest implemented a standard naming convention for all Change Management email notifications beginning in August 2001.



ROC Observation & Exception Formal Response

Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System. KPMG Consulting reviewed a total of 115 CLEC notifications² that Qwest distributed through the Mailout Notification System in December 2001, and identified the following six issues:

Delayed distribution

KPMG Consulting identified 32 instances (28% of the total notifications reviewed) in which Quest's date of a notification was earlier than its actual distribution, thus representing a delay. While the majority of these delays fell within one business day, KPMG Consulting identified 13 instances in which the delay exceeded two business days. Appendix A includes one notification that was dated December 10, 2001, but was distributed on December 27, 2001.

Email Headline	Document Date	Distribution Date
System: CEMR User's Guide Update, RN, Effective 11/30/01	11/30/2001	12/3/2001
Systems: IMA GUI Documentation Update, non-release related, 12/03/01	11/30/2001	12/3/2001
General: Meetings: RN: Collo Decommission Mtg on 12-12, Effective 12-4-01, Final	12/4/2001	12/5/2001
System: OSS Scheduled Mtc., Final 12/4/01	12/4/2001	12/5/2001
Change Management: Meeting: RN: Update from 11-30 Mtg on UNE-P Bulk Conversion, Effective 12-4-01, Final	12/4/2001	12/5/2001
Minnesota Dept. of Commerce Interrogatory Docket P421/CI-01-1370	12/5/2001	12/6/2001
System: OSS Scheduled Maintenance, 12/10/01	12/10/2001	12/11/2001
System: OSS Sched. Mtce. Weekend of 12/14, 12/12/01	12/11/2001	12/12/2001
System: IMA GUI 8.1 CTAG Users Guide Update 12/13/01	12/10/2001	12/13/2001
Process: Ordering: RN: Updates to Local Service Ordering Guidelines,	12/14/2001	12/17/2001
Product: UNE: RN: Update to Unbundled Local Loop PCAT, Effective December 17, 2001, Final	12/14/2001	12/17/2001
Process: Provisioning: RN: Update to Customer Not Ready Jeopardy Process, Effective December 14, 2001, Final	12/14/2001	12/17/2001
System: CEMR User's Guide Update, 12/14/01	12/14/2001	12/17/2001
System: Delayed Bill Post Notifications, 12/14/01	12/14/2001	12/17/2001
System: Digital Certificates & ECOM Doc, 12/14/01	12/14/2001	12/17/2001
Local Service Freeze Protection: AZ, IA, MN, MT, NE, NM, WY	12/17/2001	12/18/2001
DMT Qwest DSL Change Charge	12/14/2001	12/18/2001
Qwest DSL Service Promotion	12/14/2001	12/18/2001
Customer Premises Wire and Maintenance Plans	12/14/2001	12/18/2001
Residence VMS Service, Effective 1/2/01	12/14/2001	12/18/2001
Training: IMA Release 9.0, RN, 12/18/01	12/14/2001	12/18/2001
Business Competitive Response – IA	12/17/2001	12/19/2001
Process: Ordering: RN: Update to Service Interval Guide, Effective December 20, 2001, Final	12/19/2001	12/20/2001
Switch Conversion-Woodland Park, CO 1-12-02	12/20/2001	12/21/2001
Local Directory Assistance – MN	12/14/2001	12/26/2001

² KPMG Consulting received a total of 119 Qwest mailout notifications in December 2001. Four of them were repeated distributions, and thus, were excluded from this analysis.



Email Headline	Document Date	Distribution Date
Residence Caller ID and Security Screen Promo - IA, NM, OR, MT	12/21/2001	12/27/2001
Meet the Due Date Promotion, Effective 2/1/02	12/26/2001	12/27/2001
Residence Caller ID and Security Screen Promotion -ND, CO, WY	12/21/2001	12/27/2001
2002 Q1 Business Promotion Resale Notice - AZ, CO, IA, MT, NM, OR, SD, UT, WA, WY	12/26/2001	12/27/2001
Synchronous Service Transport, STS 1 Multiplexing	12/21/2001	12/27/2001
Business Caller ID Promotion, Effective 1/21/02	12/21/2001	12/27/2001
Residence Competitive Response Promotion - Utah	12/10/2001	12/27/2001

Erroneous topic

KPMG Consulting observed one instance in which the email headline contained an inaccurate description of its contents. On December 3, 2001, at 5:14 PM MT, Qwest distributed an email with the headline, “Process: Ordering: RN: Update to Resale Database Info, Effective December, 3, 2001, Final.” The notification included with the email was titled “Updated Information for Getting Started as a Wholesale Customer & the Negotiations Process” (Document No. PROS.12.03.01.F.00325.Getting_Started_&_Negotiations).

Late notice of system changes

KPMG Consulting reviewed 10 notifications related to system changes, and identified four instances in which Qwest notified CLECs following implementation of the associated patch or change.

Email Headline	Implementation Date	Notification Date
System: Billing System Implementations, RN, Final, 12/3/01	11/15/2001	12/3/2001
System: EMI Fields Fixed on DUF, RN, 12/6/01	11/29/2001	12/6/2001
System: Billing System Implementation 12-7-01, Final	11/29/2001	12/7/2001
System: Delayed Bill Post Notifications, 12/14/01	12/4/2001	12/14/2001

Inadequate interval for planned outage notices

KPMG Consulting identified eight notifications that were sent to CLECs about planned system outages. All were distributed within fewer than three business days in advance of the outage.³ In one instance, Qwest notified CLECs on December 7, 2001, at 5:41 PM, about a planned outage scheduled to start at 5:00AM on December 8, 2001. (Appendix B).

Email Headline	Planned Outage (Mountain Time)	Notification Date (Mountain Time)
System: OSS Scheduled Mtc., Final 12/4/01	12/7/2001 8:00 PM	12/5/2001 2:27 PM
System: OSS Scheduled Maintenance, N, Final, 12/5/01	12/9/2001 12:00 PM	12/5/2001 5:46 PM
Minnesota Dept. of Commerce Interrogatory Docket P421/CI-01-1370	12/9/2001 12:00 PM	12/6/2001 12:59 PM
System: DLIS Availability, 12/7/01	12/8/2001 5:00 AM	12/7/2001 5:41 PM

³ KPMG Consulting notes that Qwest has not formally defined the notification interval for planned system outages. See Action Item #209, p. 66 of the *CMP Redesign Draft Meeting Minutes Dec. 10-11*.



Email Headline	Planned Outage (Mountain Time)	Notification Date (Mountain Time)
System: OSS Scheduled Maintenance, 12/10/01	12/12/2001 10:00 PM	12/11/2001 5:17 PM
System: OSS Scheduled Maintenance 12-13, 12/11/01	12/13/2001 10:00 PM	12/11/2001 5:30 PM
System: OSS Sched. Mtce. CEMR-MEDIACC 12/14-12/16	12/14/2001 10:00 PM	12/12/2001 6:16 PM
System: OSS Sched. Mtce. Weekend of 12/14, 12/12/01	12/13/2001 8:30 PM	12/12/2001 6:31 PM

Inadequate information

On December 27, 2001, Qwest distributed a notification informing CLECs of rate restructuring in Montana that was planned to take effect after the January 2002 billing date. Qwest advised CLECs to contact Qwest Billing Representatives for specific details after the changes were implemented, but did not specify an exact date for when the changes were to take effect (Appendix C).

Lack of adequate tracking and verification

In response to KPMG Consulting’s data request and subsequent clarification, Qwest submitted copies of Mailout Notifications that it had distributed to CLECs, rather than an actual database or other logging tool used to track CLEC notifications⁴. KPMG Consulting infers from the data request responses that Qwest lacks a centralized database to track information that is distributed to CLECs.

Based on the above analysis, it appears that Qwest does not distribute accurate information on a timely basis. In addition, Qwest appears to lack the proper tools to track CLEC notifications and ensure that the information therein is accurate. KPMG Consulting considers the procedures, systems, and tools that Qwest uses to track information and monitor its compliance with documented intervals for notification to be an essential element of the Change Management process.

Impact

CLECs depend on accurate, dependable, and timely information to support their business and fulfill obligations of their customers. If a Mailout Notification includes an erroneous topic in its subject line, a CLEC may route the notification to the wrong department and responsible individual(s). If a Mailout Notification is distributed without an adequate interval in advance of the planned change, a CLEC might not have the flexibility to reschedule its workforce and to complete transactions in a timely manner. The issues identified in this Exception may result in CLEC operational inefficiencies, thereby reducing CLEC profitability and impacting the CLEC’s ability to compete in the Local Exchange Carrier market.

Qwest Formal Response:

KPMG issue #1, *KPMG Consulting identified 32 instances (28% of the total notifications reviewed) in which Quest’s date of a notification was earlier than its actual distribution, thus representing a delay. While the majority of these delays fell within one business day, KPMG Consulting identified 13 instances in which the delay exceeded two business days. Appendix A includes one notification that was dated December 10, 2001, but was distributed on December 27, 2001.*

⁴ KPMG Consulting data request CM27: Database of Qwest notifications to CLECs. KPMG Consulting stated, in a subsequent clarification, dated December 12, 2001, that KPMG Consulting requested “the actual database tool or logging tool that Qwest uses to keep track of the notifications it has sent to CLECs.”



Qwest evaluated the documents presented by KPMG. The document dates on these notices reflect the dates that the first drafts of these documents were prepared. Beginning January 2002, Qwest now corrects the document date to match the final date, which is the date of distribution.

The Three documents identified by KPMG were distributed after the effective date of the product availability, because the Qwest Notifications department did not log in these documents, after they were received from the Qwest Regulatory department. The Qwest Notifications department has implemented a log-in process to ensure that all document that are received are logged in and distributed in the received time period.

KPMG issue #2, *KPMG Consulting observed one instance in which the email headline contained an inaccurate description of its contents. On December 3, 2001, at 5:14 PM MT, Qwest distributed an email with the headline, "Process: Ordering: RN: Update to Resale Database Info, Effective December, 3, 2001, Final." The notification included with the email was titled "Updated Information for Getting Started as a Wholesale Customer & the Negotiations Process" (Document No. PROS.12.03.01.F.00325.Getting_Started_&_Negotiations).*

Qwest is aware of the inaccurately titled notification, titled "Process: Ordering: RN: Update to Resale Database Info, Effective December 3, 2001, Final," sent at 5:14 PM MT on December 3, 2001. Qwest immediately identified the error and 13 minutes later sent a notification under the correct title, "RESEND: Process: Ordering: RN: Update to Getting Started & Negotiations Information, Effective December 3, 2001, Final," at 5:27 PM MT on December 3, 2001. Qwest feels that any confusion caused by the initial incorrect notification was immediately resolved by the corrected notification.

KPMG issue #3, *KPMG Consulting reviewed 10 notifications related to system changes, and identified four instances in which Qwest notified CLECs following implementation of the associated patch or change.*

Email Headline	Implementation Date	Notification Date
System: Billing System Implementations, RN, Final, 12/3/01	11/15/2001	12/3/2001
System: EMI Fields Fixed on DUF, RN, 12/6/01	11/29/2001	12/6/2001
System: Billing System Implementation 12-7-01, Final	11/29/2001	12/7/2001
System: Delayed Bill Post Notifications, 12/14/01	12/4/2001	12/14/2001

The first notification titled "System: Billing System Implementations, RN, Final, 12/3/01" was to announce that Qwest implemented table updates to correct bills for UNE-P accounts in Colorado. The notification explained that previously, an incorrect table update occurred which resulted in UNE-P accounts receiving an incorrect credit. The notification explained that Qwest would not pursue collection for credits that had already been applied. Qwest distributed this notification to the CLECs for informational purposes only. Quest's correction of the rate table did not affect CLEC systems that interconnect with Quest's systems and it did not cause CLECs a need to alter their operating procedures. Nevertheless, in response to a similar occurrence noted in TI-785, Qwest provided KPMG with a new procedure for notification to CLECs of corrections to tables resulting from a rate validation effort. KPMG recently recommended closure of TI-785.

The second notification titled "System: EMI Fields Fixed on DUF, RN, 12/6/01" informed CLECs that Qwest had discovered and fixed two EMI fields that were not being correctly populated on the Daily Usage Feed (DUF). So as to reduce any negative impact to the CLECs, Qwest corrected these fields immediately upon error detection (i.e. a bug fix), making prior notification both impractical and impossible. Within a reasonable period following detection and correction of the error, Qwest notified CLECs of the error resolution.



The third notification titled "System: Billing System Implementation 12-7-01, Final" informed CLECs that Qwest implemented new system edits which identify whether a Qwest-carried intra-LATA toll record, is a toll call or a local call. Prior to November 29, 2001, an EMI 100101 toll record and a 100131 local record were sent to the CLEC to use to bill the end user. With this new edit, if the call is local, Qwest sends only the 100131 local record. If the call is toll, Qwest sends both the 110101 access record and a 100101 toll record. These edits corrected a problem of duplicate EMI records being created and Qwest notified CLECs of the error resolution.

The fourth notification titled "System: Delayed Bill Post Notifications, 12/14/01" informed CLECs that Qwest had discovered that some of the Bill Post Notifications associated with LSRs having multiple service orders were not sent to the GUI nor were they sent via EDI. The notification explained that, although there was a delay in providing these notifications, there was no delay in the actual posting of the service orders to the CRIS system. Again, Qwest's policy is to implement systems correction immediately, if possible, rather than allowing these errors to continue until after CLECs are given advance notice of these corrections. Qwest believes it is proper to prioritize the corrections, where this is achievable. Where Qwest can immediately, or in short order, correct an identified systems error, it will continue to do so. Where systems errors cannot be immediately corrected, Qwest will provide notice in advance of corrections, which may take place at a later date.

KPMG issue #4, KPMG Consulting identified eight notifications that were sent to CLECs about planned system outages. All were distributed within fewer than three business days in advance of the outage.⁵ In one instance, Qwest notified CLECs on December 7, 2001, at 5:41 PM, about a planned outage scheduled to start at 5:00AM on December 8, 2001. (Appendix B).

Qwest is committed to providing its wholesale customers accurate notifications of planned system outages no less than 48 hours in advance of the outage. Unfortunately, in two instances, Qwest did not meet that commitment because of an internal miscommunication. Qwest has addressed this issue with the employee responsible for the delay.

Following is a table that identifies the notification intervals:

Document Number Subject	Notification Date/Time	Hours in advance of Outage/Maintenance
SYST.12.04.01.F.02449_OSS_Scheduled_Mtce. Operations Support Systems(OSS) Scheduled Maintenance	12/5/2001 2:26PM	53
SYST.12.05.01.F.02451.OSS_Scheduled_Mtce Operations Support Systems Scheduled Maintenance	12/5/2001 5:45PM	90
SYST.12.06.01.F.02458.OSS_Scheduled_Mtce Operations Support Systems(OSS) Scheduled Maintenance	12/6/2001 5:22PM	NA - This was a clarification to the two notices above that did not impact notification intervals.
SYST.12.07.01.F.02463.DLIS_Availability Directory Listing Inquiry System Availability	12/7/2001 5:40PM	11
SYST.12.10.01.F.02468.OSS_Scheduled_Maintenance Operations Support Systems (OSS) Scheduled Maintenance	12/11/2001 5:17PM	29 Note: This notification informed CLECs that FOCs <u>could</u> be delayed beginning at 10:00 PM Dec 12 and ending at 6:00 AM Dec 13.

⁵ KPMG Consulting notes that Qwest has not formally defined the notification interval for planned system outages. See Action Item #209, p. 66 of the *CMP Redesign Draft Meeting Minutes Dec. 10-11*.



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Document Number Subject	Notification Date/Time	Hours in advance of Outage/Maintenance
SYST.12.11.01.F.02472.OSS_Sched_Mtce_12-13_CEMR-MEDIACC OSS Scheduled Maintenance December 13 with CEMR/MEDIACC Impacts	12/11/2001 5:29PM	52
SYST.12.12.01.F.02473.OSS_Sched_Mtce_12-14_12-16_CEMR-MEDIACC OSS Scheduled Maintenance for December 14, 2001 through December 16, 2001 with CEMR/MEDIACC Impacts	12/1/2001 6:15PM	52
SYST.12.12.01.F.02471.OSS_Sched_Mtce_12-14_Wknd Operations Support Systems (OSS) Scheduled Maintenance	12/1/2001 6:30PM	52

At the February 5-7 CMP Redesign meeting, Qwest and the CLECs agreed to planned outage notifications based on Action Item #209. That agreement is as follows:

“Action #209 (From Redesign Issues/Actions Log) Propose language and time frame for scheduled maintenance. Notification and inclusion of known patches or any other known CLEC impacting changes. Whether scheduled maintenance. Included under Production Support in Section 11.1 of the Master Red Line Document. Closed 2-6-02”

The agreed to Master Redline language is as follows:

“Notification of Planned Outages

Planned Outages are reserved times for scheduled maintenance to Operations Support Systems (OSS). Qwest sends associated Notifications to all CLECs. Planned Outage Notifications must include:

- Identification of the subject OSS.
- Description of the scheduled OSS maintenance activity.
- Impact to the CLECs (e.g. geographic area, products affected, system implications, and business implications).
- Scheduled date and scheduled start and stop times.
- Work around, if applicable.
- Qwest contact for more information on the scheduled OSS maintenance activity.

Planned Outage Notifications will be sent to CLECs and appropriate Qwest personnel within 2 days of the scheduling of the OSS maintenance activity.”

Furthermore, as discussed at the January 22-24, 2002 Redesign meeting, some IT Help Desk trouble tickets may require a very quick turnaround for system maintenance. When a quick turnaround for system maintenance is required, Qwest must balance the need to address the maintenance problem with the need to notify CLECs in advance of the maintenance.

KPMG issue #5, *On December 27, 2001, Qwest distributed a notification informing CLECs of rate restructuring in Montana that was planned to take effect after the January 2002 billing date. Qwest advised CLECs to contact Qwest Billing Representatives for specific details after the changes were implemented, but did not specify an exact date for when the changes were to take effect (Appendix C).*

As indicated at the top of the notification, the Effective Date for this Regulatory Mandated change was December 28, 2001. As stated in the body of the notification, “These rates will be reflected on or after your January bill date.”



Additionally, in TI 785 Qwest committed that beginning March 1, 2002, Qwest will implement a notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes

KPMG issue #6, *In response to KPMG Consulting's data request and subsequent clarification, Qwest submitted copies of Mail out Notifications that it had distributed to CLECs, rather than an actual database or other logging tool used to track CLEC notifications⁶. KPMG Consulting infers from the data request responses that Qwest lacks a centralized database to track information that is distributed to CLECs.*

Based on the above analysis, it appears that Qwest does not distribute accurate information on a timely basis. In addition, Qwest appears to lack the proper tools to track CLEC notifications and ensure that the information therein is accurate. KPMG Consulting considers the procedures, systems, and tools that Qwest uses to track information and monitor its compliance with documented intervals for notification to be an essential element of the Change Management process.

Qwest misunderstood KPMG Consulting's data request. Qwest does have a centralized internal database designed to track CLEC notifications and on January 25, 2002 Qwest launched a web based search tool for external users for Wholesale Customer Notification Letters (CNLA). (Document Number: WEBS.01.31.02.F.02700.CNLA) See APPENDIX D.

As stated in the notification,

"The customer Notification Letter Archive is a searchable database to help you find notices that have been released to Qwest's Wholesale customers."

Each time a notice is distributed to our CLEC and Resale customers, a copy is posted to this site. You may search by date, category, (i.e. Product, Process, Network, etc), sub-category (i.e. meetings, announcements, UNE, Collo, Ordering, Billing etc.) The search tool itself will identify what the search options include.

The CNLA search tool was designed to support the elements in the notification Naming Convention agreed upon in the Change Management Process Redesign Meetings. The primary categories of notification are:
Change Management Notices General Notices Network Notices (including Tech Pubs)
Product Notices Process Notices Systems Notices
Tariff Notices Training Notices Web Site Notices

The tool is found on the Qwest Wholesale Web site in the Notices section at this URL:

<http://www.qwest.com/wholesale/notices/cnla/>

The design and naming conventions implemented with this tool were agreed to in CMP Redesign sessions.

Qwest Supplemental Response (03/05/2002):

Qwest made the following commitment in the 2/26/02 response:

"[Issue #5] Beginning March 1, 2002, Qwest will implement a notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes."

Qwest launched this notification process on 3/1/02.

⁶ KPMG Consulting data request CM27: Database of Qwest notifications to CLECs. KPMG Consulting stated, in a subsequent clarification, dated December 12, 2001, that KPMG Consulting requested "the actual database tool or logging tool that Qwest uses to keep track of the notifications it has sent to CLECs."



KPMG Comments (03/13/2002):

KPMG Consulting reviewed Qwest's February 26, 2002 and March 5, 2002 responses. KPMG Consulting's response to each of the identified issues follows:

Issue #1 Delayed Distribution

In its response, Qwest acknowledged the incorrect date of notification in previous distributions and stated Qwest now ensures that the documentation date matches the final distribution dates. In addition, Qwest has implemented a log-in process to ensure that all documents that are received are logged in and distributed in a timely manner. KPMG Consulting will monitor notifications sent out until the end of the test to verify that Qwest's implementation of a new process addresses this notification issue. This issue remains open pending successful retest results.

Issue #2 Erroneous Topic

KPMG Consulting reviewed Qwest's response and confirms that it received the corrected notification with the appropriate headline/topic that Qwest referenced in its response. KPMG Consulting also noted that the corrected notification was distributed shortly after the identified, inaccurately titled instance. This issue is resolved.

Issue #3 Late Notice of System Changes

In its response, Qwest referred to the lack of advance notice of bill rate validation activity at the time when this Exception was first published. KPMG Consulting formally identified this issue in Observation 3074. Based on Qwest's responses to Observation 3074 and this Exception, it appears that Qwest has implemented a notification process and corresponding intervals to address the bill rate notification issue. KPMG Consulting is satisfied with Qwest's response to the first identified instance.

With respect to the latter three instances of notifications that were issued following the implementation of the change, KPMG Consulting recognizes the need for Qwest to correct system errors immediately, and that advance notice of patch implementations through the Mailout Notification System may not always be feasible. Delays for the examples provided ranged from five to eight business days. The discussion about documented intervals for notifying CLECs about unanticipated system fixes, patches, or unplanned outages is addressed in the current scope of Exception 3112. KPMG Consulting, therefore, closes these three instances for the purposes of E3110 and will address this issue in E3112.

Issue #4 Inadequate Interval for Planned Outage Notices

KPMG Consulting reviewed the Production Support section of the *Master Redlined CLEC-Qwest Redesign Framework*⁷ and confirms the established documented notification interval of two days for planned outages as part of language resulting from Action Item Reference #209. Qwest and CLECs have agreed to a 48-hour interval for notification of planned outages in cases when Qwest has scheduled maintenance to Operational Support Systems. KPMG Consulting acknowledges that when a quick turnaround for system maintenance is required as described in Qwest's latest response to this Exception, those instances would be examples of *unplanned* outages and/or system fixes, which are not subject to the 48-hour interval. KPMG Consulting concurs that under the new policy as applied to the examples from December, 2001, there were only two instances in which Qwest did not meet the 48-hour commitment. KPMG Consulting will continue to monitor notifications sent out until the end of the test to verify that the 48-hour interval is being met. This issue remains open pending successful retest results.

⁷ The *Master Redlined CLEC-Qwest Redesign Framework* is accessible from the Qwest CMP Redesign Web site located at <http://www.qwest.com/wholesale/cmp/redesign.html>.



Issue #5 Inadequate Information

KPMG Consulting reviewed Qwest’s February 26 and March 5, 2002 responses which state that it had implemented a notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes. KPMG Consulting will monitor notifications sent out until the end of the test to verify that Qwest’s implementation of a new process addresses this issue. This issue remains open pending successful retest results.

Issue #6 Lack of Adequate Tracking and Verification

KPMG Consulting reviewed the CNLA Web site and confirms it contains notifications searchable by category, distribution date, or type of notice. The Web site also hosts an archive of past notifications as well as instructions for subscribing to the Mailout Notification System.⁸

The Web site does not appear to support tracking functions to ensure that notifications are sent in compliance with agreed upon intervals. Qwest’s response states that “Qwest does have a centralized internal database designed to track CLEC notifications...” KPMG Consulting requests that Qwest provide additional information and documentation to support the existence of and adherence to the tools and processes in place to ensure accurate and timely distribution of notifications. This issue remains unresolved.

KPMG Consulting recommends that Exception 3110 remain open pending resolution of the one remaining issue and successful retest results for the issues to be monitored until the test ends.

Qwest Response to KPMG Comments (03/19/2002):

Qwest has undertaken a two-fold approach to ensure that notifications are provided based on either (i) agreed to CMP requirements or (ii) when not subject to CMP requirements, other existing standards or requirements. This approach includes processes developed within each contributing functional group and an ongoing internal performance assessment.

Qwest will provide, through the confidential data request process, three Functional Process examples that demonstrate the processes that ensure compliance with customer notification obligations.

- Excerpt from *External Documentation Team Methods and Procedures*: This document excerpt illustrates the process and timelines the Qwest Wholesale External Documentation Team follows to prepare Product Catalogue (PCAT) and Local Services Ordering Guide (LSOG) additions and changes for inclusion in a customer notification and distribution to the CLECs. This document excerpt will be provided via the DR process.
- *Technical Publication Process Document, Section 2.6*: This document excerpt illustrates the process and timelines that Qwest follows to prepare Technical Publication additions and changes for inclusion in a customer notification and distribution to the CLECs. This document, in its entirety, is provided to, and used by, all publishers of network Technical Publication documentation. This document excerpt will be provided via the DR process.
- *Wholesale Customer Notification Process, Version 2.0*: This document details the process that Qwest uses to funnel all notifications to Qwest’s CLEC customers through a single channel for final message preparation and distribution, and the methods Qwest uses to create messages consistent in content preparation, design, layout, and tone. This document is posted on the Qwest internal Intranet site and is used by affected employees. This document will be provided via the DR process.

⁸ The subscription Web site is located at: <http://www.qwest.com/wholesale/notices/cnla/maillist.html>.



Qwest also develops project plans for all OSS Interface changes, introductions and retirements. Project plans assist Qwest in tracking deliverables, timelines and documentation changes, including the timely distribution of notifications. Qwest will provide two examples of these, as described below, via the DR process

- *IMA Release 10.0 DRAFT Application-to-Application and GUI Release Project Plan*: This project plan documents and tracks Qwest's compliance with every deliverable, timeline, and documentation change necessary to successfully implement IMA Release 10.0.
- *FORCAST GUI Project Plan*: This project plan documents and tracks Qwest's compliance with every deliverable, timeline, and documentation change necessary to successfully implement the FORCAST GUI.

Additionally, Qwest has implemented performance assessment tracking with all mail out notifications, and is tracking those notifications as they are issued. The *Notification Compliance Assessment – February-March 2002* includes an analysis of each notification to ensure that it meets advance notification timeframes, naming convention requirements, comment requirements, and provides feedback mechanisms, when applicable. This document will be provided via the DR process.

As agreements on notification items are reached in the CMP Redesign, such as advance notification timeframes for Qwest initiated Product/Process changes, Qwest immediately notifies all affected functional groups to inform them of the agreed to notification timeframes and required implementation dates and ensures that such groups update their applicable notification processes documents. Qwest also incorporates those notification requirements into the performance assessment tracking and begins providing immediate analysis and problem resolution recommendations, when required, to ensure compliance with the notification requirements.

Qwest Response to Focus O&E Discussion (03/22/2002):

Based on the KPMG and Qwest Focused O&E call on March 21, 2002, Qwest agreed to develop supplemental information identifying the functional roles and responsibilities of those managing notification generation and compliance. The confidential matrix that identifies those functions will be provided via the DR process.

KPMG Recommending Inconclusive Closure (03/27/2002):

KPMG Consulting has reviewed Qwest's March 19, 2002 response, participated in an O&E call held on March 21, 2002, and summarizes the remaining issues in Exception 3110 as follows:

Issue #1 Delayed Distribution

KPMG Consulting reviewed a total of 278 mailout notifications that Qwest distributed between February 1, 2002 and March 22, 2002, and identified one incident in which Qwest distributed a notification two days later than scheduled. KPMG Consulting is satisfied with retest results, and considers this issue resolved.



Issue #4 Inadequate Intervals for Planned Outage Notices

KPMG Consulting attended the January 17, 2002 Systems CMP meeting and was aware that Qwest implemented the Production Support section of the *Master Redlined CLEC-Qwest Redesign Framework* on February 1, 2002. KPMG Consulting reviewed a total of 278 mailout notifications between February 1, 2002 and March 22, 2002, and identified three planned system outage notices, all of which were distributed more than 48 hours in advance of scheduled maintenance. This issue is resolved.

Issue #5 Inadequate Information

KPMG Consulting observed that Qwest notified CLECs on March 1, 2002 about restructured rates for Washington state that would become effective as of the March and April billing cycles. In addition to observance of the Washington state notification, KPMG Consulting reviewed *Wholesale Customer Notification Process Version 2.0* dated March 15, 2002, which defines the process that supports Qwest's communications to CLECs. KPMG Consulting was unable to locate information in Section 4.3, "Distribution Timelines", that specifically relates to cost docket rate changes. KPMG Consulting would expect Qwest to update the *Wholesale Customer Notification Process Version 2.0* to reflect the specified 15-day interval for cost docket rate changes and any other intervals agreed upon through CMP Redesign. Based on the observation noted, and the expected documentation updates, KPMG Consulting considers this issue closed.

Issue #6 Lack of Adequate Tracking and Verification

Qwest stated in its March 19, 2002 response that it employs a "two-fold approach to ensure that notifications are provided based on either (i) agreed to CMP requirements or (ii) when not subject to CMP requirements, other existing standards or requirements." To support the assertion that it has processes to manage adherence to established intervals, Qwest provided KPMG Consulting with the following process documentation:

- *External Documentation Team Methods and Procedures*
- *Technical Publication Process Document, Section 2.6* dated February 22, 2002
- *Wholesale Customer Notification Process Version 2.0* dated March 2002
- *IMA Release 10.0 DRAFT Application-to-Application and GUI Release Project Plan*
- *FORCAST GUI Project Plan*
- *Notification Compliance Assessment – February-March 2002*

In addition to the documents noted above, KPMG Consulting also reviewed the following two documents:

- *IT CMP Timeline Release Requirements for OSS Application-to-Application Interfaces Version 1.0* dated March 20, 2002
- *IT CMP Timeline Release Requirements for OSS Graphical User Interfaces Version 1.0* dated March 20, 2002

KPMG Consulting reviewed all of the documents, noting that it appears that the software development teams and the product/process documentation teams have processes to support adherence to the CMP established intervals. Also, KPMG Consulting confirmed that the *Qwest Notification Compliance Assessment* analyzed Qwest's compliance with the standard naming conventions, planned outage intervals, and document dates for the period beginning February 1, 2002 through March 15, 2002. Finally, KPMG Consulting reviewed the project plans for IMA 10.0 and FORCAST, and confirms that both documents specify the dates on which Qwest is committed to distribution of release documents via Change Management.



Although Qwest appears to have documented procedures for adherence to the intervals, KPMG Consulting has not been able to observe these processes in practice. In previous responses, KPMG Consulting has requested that Qwest provide evidence of a tool used to manage interval adherence. However, on a Focus Call held March 21, 2002, Qwest confirmed that CMP staff does not have a centralized mechanism to track and ensure documentation release intervals for all upcoming software releases. Since Qwest does not have a centralized tool for tracking adherence to intervals, KPMG Consulting has only been able to review the documentation noted in Qwest's March 19, 2002 response to determine Qwest's ability to use these systems to manage adherence to established intervals. Although the documentation provides sufficient evidence that procedures and systems exist, this information is not sufficient for determining adherence to the documented processes. The next major release is for IMA Release 10.0 currently scheduled for implementation on June 17, 2002.

Due to the current schedule of this test, KPMG Consulting will not be able to determine if Qwest's documented processes provide the ability to perform adequate tracking or verification for adherence to the documentation release intervals in the *Master Redlined CLEC-Qwest CMP Redesign Framework*. Therefore, KPMG Consulting recommends that this issue be closed inconclusive.

KPMG Consulting recommends that Exception 3110 be closed inconclusive based on Issue #6 noted above. A disposition report will follow.

Qwest Supplemental Response (04/01/2002):

Qwest asserts that the documented processes provide the ability to perform adequate tracking and adherence to the documentation release intervals in the *Master Redlined CLEC-Qwest CMP Redesign Framework*. Due to the current schedule of this test, Qwest requests that KPMG Consulting conduct no further testing. Qwest does not believe the one remaining unresolved issue warrants an extension of the test time line. Qwest recognizes this will not allow KPMG to determine if Qwest's documented processes, which KPMG has now evaluated, provide the ability to perform adequate tracking or verification for adherence to the documentation release intervals in the Master Redlined CLEC-Qwest CMP Redesign Framework.

KPMG Disposition Report (04/02/2002):

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 (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 another report, Exception 3112, and will address it accordingly. KPMG Consulting was unable to fully test for resolution of issue (6) since established intervals and milestones will occur outside of the scope of the Change Management Process test execution phase.

Summary of KPMG Consulting's Retest Results:

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) and (4) resolved.

KPMG Consulting received a corrected notification shortly after Qwest had distributed the inaccurately titled notification in issue (2). KPMG Consulting recognizes that Qwest employed an ad hoc process to address such anticipated errors, and considers issue (2) resolved.



KPMG Consulting observed that Qwest notified CLECs on March 1, 2002 about restructured rates for Washington State. It appeared that Qwest had implemented a notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes. KPMG Consulting subsequently closed issue (5).

Issue #6 Lack of Adequate Tracking and Verification

During the O/E Focus Call on March 21, 2002, 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 and product/process documentation teams have procedures to prepare documents and distribute them in accordance with the intervals specified in the *Master Redlined CLEC-Qwest CMP Redesign Framework*. Due to the recent implementation of these process changes, KPMG Consulting has not been able to observe adherence to the documented process for notification interval management. Since Qwest has requested that KPMG Consulting conduct no further testing, KPMG Consulting will not be able to determine if Qwest’s documented processes provide the ability to perform adequate tracking or verification for adherence to the documentation release intervals.

KPMG Consulting recommends that Exception 3110 be closed as inconclusive.

Qwest Response to KPMG Disposition (04/25/2002):

KPMG Consulting indicated in its 03/22/02 response that due to the schedule of the test, it would not be possible to determine if Qwest’s documented processes provide the ability to perform adequate tracking and adherence to the documentation release intervals in *Master Redlined CLEC-Qwest CMP Redesign Framework*. The notification cycle for the next major release (IMA Release 10.0) is underway for the June 17, 2002 implementation date. The Draft 10.0 EDI Disclosure Document was issued April 4, 2002 with the comment period ending April 23, 2002. The Final 10.0 EDI Disclosure Document is due to be issued May 3, 2002. Qwest believes KPMG Consulting is now in a position to observe adherence to the documentation release intervals with the conclusion of the comment and response period ending on May 3, 2002. Qwest requests that KPMG Consulting review the documents issued through May 3, 2002 and reconsider the disposition of this exception.

Qwest Response to Focus O&E Action Item (05/02/2002):

Qwest is providing this response as a result of the O&E call on April 30, 2002. Qwest and the CLECs agreed that the requirements for following OSS Interface notification requirements for Changes, Introduction, or Retirement of an OSS effective with IMA 10.0. The first notification milestone date required for IMA 10.0 was the notification associated with issuing the Draft Technical Specifications. This milestone date, based on the OSS Interface Release calendar maintained on the Qwest CMP website, was April 5, 2002. Qwest issued this IMA 10.0 notification on April 4, 2002. Qwest is managing all OSS Interface notifications required on or after April 4, 2002 under the agreed to CMP notification timelines for OSS Interfaces.

Additionally, Qwest followed all applicable CMP notification timelines for Introduction of a New GUI Interface (FORCAST) beginning with the Initial Notice on March 8, 2002. FORCAST was the only OSS Interface that followed CMP notification timelines prior to April 4, 2002. The actual notifications for the above, referenced items can be found at: <http://www.qwest.com/wholesale/notices/>.

Qwest is providing a tracking spreadsheet titled “OSS Interface Release Notification Tracking – Wholesale CMP” that shows recent CMP notification results based on the Qwest OSS Release Calendar that is posted to the Qwest Wholesale CMP website at <http://www.qwest.com/wholesale/cmp/osscalendar.html>. Please note that all CMP schedule items listed on this spreadsheet are exactly as listed on the Qwest OSS Release



Calendar, but not all items require notification. For instance, the Comment Cycle lists “NA” in the “CNLA Website” column and does not require a notification.

KPMG 3rd Supplemental Recommendation (05/07/2002):

KPMG Consulting has re-evaluated Qwest’s adherence to the documented process for Qwest CMP notifications. KPMG Consulting had requested that Qwest provide evidence of a centralized tool used to manage interval adherence as per the remaining Issue #6 for this Exception. Qwest stated in its April 25, 2002 response that the notification cycle for IMA Release 10.0 is progressing and that KPMG Consulting should be able to review all Qwest software release notifications issued through May 3, 2002 to observe adherence to the established documentation release intervals. Qwest further clarified that software release notifications had complied with the documented CMP intervals since April 4, 2002.

KPMG Consulting considers that the CMP intervals apply to all OSS interfaces, not just IMA. Therefore, this updated review of adherence to the defined process was based on the issuance of release notifications for CEMR, TELIS, IABS, EXACT, IMA, and RSL-IC Loss and Completion Report Calendar. KPMG Consulting confirms that for IMA Release 10.0, Qwest was able to meet the two major release interval milestones for the issuance of Draft Technical Specifications and Final Technical Specifications.

KPMG Consulting identified a total of eight software release notifications distributed between April 4, 2002 and May 3, 2002 relative to the release updates for five different Qwest OSS interfaces and the retirement of one interface, IMA Release 9.0. KPMG Consulting found one instance in which Qwest appeared to have missed the distribution date for the notification to CLECs. Specifically, KPMG Consulting had expected the release of Final Technical Specifications for IABS Release 84 on May 1, 2002 but was unable to locate this notification in the CMP mailouts. Regardless of this particular example, KPMG Consulting is currently unable to determine if Qwest adheres to all CMP software release notification intervals based on the relatively few mailout notifications sent after April 4, 2002 and available for observation.

KPMG Consulting will continue to monitor the Change Management notifications to assess adherence to the documentation release intervals through May 17, 2002. However, based on the limited information available to confirm adherence to the process since April 4, 2002, KPMG Consulting cannot yet determine if Qwest’s methods, procedures, and tools are adequate for ensuring interval compliance.

Qwest provides a rolling 12-month OSS Interface Release Calendar that indicates the schedule of releases, notifications, release notes, comment cycles, and technical specifications associated with each OSS interface. The calendar has been continuously updated during the implementation of the revised CMP. For example, Version 9 of the Calendar indicates that the IABS Release R85 implementation date changed by 26 days from the date listed in the earlier Version 6⁹ of the Calendar. KPMG Consulting understands that while many of the dates remain fixed and are able to be tracked relative to CMP intervals, others are more dynamic and reflect the changes and exceptions that Qwest and CLECs have imposed as a result of CMP Redesign. KPMG Consulting requests clarification regarding the relationship of changes to the OSS Interface Release Calendar and adherence to established intervals.

KPMG Consulting recommends that the status of Exception 3110 be changed from “closed, inconclusive” to “open,” pending verification of adherence to established notification intervals.

⁹ Versions 6 and 9 of the Qwest OSS Release Calendar were issued on March 18, 2002 and April 23, 2002 respectively.



Qwest Response to KPMG 3rd Supplemental Recommendation (05/10/2002):

Qwest has identified two items in KPMG Third Response that Qwest will address in this response.

1. *KPMG Consulting identified a total of eight software release notifications distributed between April 4, 2002 and May 3, 2002 relative to the release updates for five different Qwest OSS interfaces and the retirement of one interface, IMA Release 9.0. KPMG Consulting found one instance in which Qwest appeared to have missed the distribution date for the notification to CLECs. Specifically, KPMG Consulting had expected the release of Final Technical Specifications for IABS Release 84 on May 1, 2002 but was unable to locate this notification in the CMP mailouts. Regardless of this particular example, KPMG Consulting is currently unable to determine if Qwest adheres to all CMP software release notification intervals based on the relatively few mailout notifications sent after April 4, 2002 and available for observation.*

As Qwest worked through the software development cycle with IABS Release 84, Qwest determined that there were no changes to billing functionality for local services provided to the CLECs or to their end-users. Since there were no changes affecting the billing functionality provided to the CLECs or to their end-users, the IABS release 84 which required final technical specifications on May 1, 2002 as well as the implementation date of June, 15, 2002, was removed from the OSS Release Calendar .

For Version 6 of the Qwest OSS Release Calendar, ALL IABS release dates were provided for the next 12 months. As of Version 9 of the OSS Release Calendar, Qwest reflects IABS releases for the next 12 months that include identified changes to billing functionality for local services provided to the CLECs or to their end-users. If at a later date an IABS release is determined to affect billing functionality for local services provided to the CLECs or to their end-users, the release will be added to the Qwest OSS Release Calendar. As required in the *Master Redlined CLEC-Qwest CMP Redesign Framework* document in section 6.0, the OSS Release Calendar version 9 was presented to the CLECs at the first CMP Systems Meeting of the second quarter on April 18, 2002. IABS Release 84 was not presented to the CLECs at that time, as the release had been removed from the calendar.

2. *Qwest provides a rolling 12-month OSS Interface Release Calendar that indicates the schedule of releases, notifications, release notes, comment cycles, and technical specifications associated with each OSS interface. The calendar has been continuously updated during the implementation of the revised CMP. For example, Version 9 of the Calendar indicates that the IABS Release R85 implementation date changed by 26 days from the date listed in the earlier Version 610 of the Calendar. KPMG Consulting understands that while many of the dates remain fixed and are able to be tracked relative to CMP intervals, others are more dynamic and reflect the changes and exceptions that Qwest and CLECs have imposed as a result of CMP Redesign. KPMG Consulting requests clarification regarding the relationship of changes to the OSS Interface Release Calendar and adherence to established intervals.*

Release dates posted to the OSS Release calendar are considered target dates that Qwest occasionally changes due to various issues that may arise during the software development cycles. The CMP release notification dates in the OSS Release Calendar are based on the target implementation dates contained in the OSS Release Calendar. When the target implementation date changes on the OSS Release Calendar, Qwest will modify the applicable notification dates in the OSS Release Calendar. These dates will be modified based on the intervals required by CMP.

The example of this situation that KPMG identified was the IABS Release 85. This release was originally identified on the OSS Release Calendar with a target implementation date of July 27, 2002 as reflected in version 6 of the OSS Release Calendar. A CLEC-initiated Change Request was

¹⁰ Versions 6 and 9 of the Qwest OSS Release Calendar were issued on March 18, 2002 and April 23, 2002 respectively.



submitted that resulted in a Qwest and CLEC agreement to move up the target implementation date of IABS Release 85 to July 1, 2002. Qwest updated the OSS Release Calendar version 9 to reflect this new date, and modified the appropriate notification dates for the release in the OSS Release Calendar. These dates are in compliance with CMP guidelines.

Attachment(s):



APPENDIX A



December 27, 2001

KPMG Consulting
KPMG Data

qwestosscm@kpmg.com

To: KPMG Consulting

Announcement Date: December 10, 2001

Effective Date: December 10, 2001

Document Number: PROD.12.10.01.F.A000236

Notification Category: Product Notification

Target Audience: CLEC, Resellers

Subject: Residence Competitive Response Promotion - Utah

This is to advise you of a retail promotional offer. Qwest apologizes for the delay in notification.

Product name: Residence Competitive Response Promotion

Tariff/catalog/price list reference: No tariff

State(s): Utah

Effective date of retail offer: 12/10/01 through 3/9/02

Description:

The Residence Competitive Response Promotion will be offered during a promotional period from December 10, 2001 through March 9, 2002, to residence customers who have terminated or canceled all or part of their Company services and established service with another telecommunications provider, and such residence customers are reestablishing service with the Company.

Returning residence customers can receive a maximum of either a waiver of the current nonrecurring charge(s), or up to two months credit of the current monthly rate(s), or both, on selected services as determined by the Company.

Please notify only those resellers with approved resale agreements according to the terms specified in their resale agreement. Advise them that retail offers that are subject to Commission



ROC Observation & Exception Formal Response

approval and may change. Reseller should monitor filings, since Qwest will not provide notification of changes.

If you have any questions or would like to discuss this notice please contact your Qwest Sales Executive, Sue Gwin on 3039653353. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest

cc: Sue Gwin

Pam O'Connell



APPENDIX B



December 7, 2001

KPMG Consulting
KPMG Data

,
qwestosscm@kpmg.com

To: KPMG Consulting

Announcement Date: December 7, 2001
Effective Date: December 7, 2001
Document Number: SYST.12.07.01.F.02463.DLIS_Availability
Notification Category: General Notification
Target Audience: CLECs, Resellers
Subject: Directory Listing Inquiry System Availability

This *Communicator* is to advise you that, as a result of scheduled maintenance of the Listing Service System (LSS), the Directory Listing Inquiry System (DLIS) will not be available on December 8, 2001 from 5:00 AM to 8:00 PM Mountain time. The functionality is expected to be restored by 5:00 AM, Mountain time, December 10, 2001.

Questions regarding this *Communicator* can be directed to Melissa Garcia at 303-965-6019.

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Pam O'Connell on 303-965-9303. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest

cc: Sue Gwin

Pam O'Connell



APPENDIX C



December 27, 2001

KPMG Consulting
KPMG Data

qwestosscm@kpmg.com

To: KPMG Consulting

Announcement Date: December 27, 2001

Effective Date: December 28, 2001

Document Number: GENL.12.27.01.F.001516.Montana_Rate_Restructure

Notification Category: General Notification

Target Audience: CLEC, Reseller

Subject: Rate Restructuring for the State of Montana

In accordance with your Interconnection Agreement with Qwest Corporation (formerly doing business as U S WEST Communications, Inc), rates have been restructured pursuant to the Stipulation Agreement approved on October 12, 2001, by the Montana Public Service Commission in Docket Number D2000.6.89 by Order Number 6260b.

These rates will be reflected on or after your January bill date. Activity is in progress to apply billing adjustments based upon true-up requirements ordered by the Montana Public Service Commission as well as true-up requirements defined in your Interconnection Agreement.

Once the rates have been implemented and the adjustments have been applied, please contact your Qwest Billing Representative for specific details or if you have any questions.

If you would like a copy of your rate sheet, please contact your Service Manager.

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Pam O'Connell on 303-965-9303. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest

Note: While these updates reflect current practice, it is important to note that there are additional changes



ROC Observation & Exception Formal Response

that will be forthcoming as a result of ongoing regulatory activities e.g., collaborative workshops, and state commission orders. As these changes are defined and implementation dates are determined, notice of additional updates will be provided accordingly.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process.

Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

cc: Sue Gwin

Pam O'Connell



APPENDIX D

Announcement Date: January 31, 2002
Effective Date: Immediately

Document Number: WEBS.01.31.02.F.02700.CNLA

Notification Category: Web Site Notification

Target Audience: CLECs, Resellers

Subject: New Customer Notice Search Tool - CLNA

TO:

Qwest announces the launch of its new web based search tool for Wholesale Customer Notification Letters (CNLA). The customer Notification Letter Archive is a searchable database to help you find notices that have been released to Qwest's Wholesale customers.

Each time a notice is distributed to our CLEC and Resale customers, a copy is posted to this site. You may search by date, category, (i.e. Product, Process, Network, etc), sub-category (i.e. meetings, announcements, UNE, Collo, Ordering, Billing etc.) The search tool itself will identify what the search options include.

The CNLA search tool was designed to support the elements in the notification Naming Convention agreed upon in the Change Management Process Redesign Meetings. The primary categories of notification are:

- | | | |
|---------------------------|------------------|---------------------------------------|
| Change Management Notices | General Notices | Network Notices (including Tech Pubs) |
| Product Notices | Process Notices | Systems Notices |
| Tariff Notices | Training Notices | Web Site Notices |

The tool is found on the Qwest Wholesale Web site in the Notices section at this URL:

<http://www.qwest.com/wholesale/notices/cnla/>

As a point of clarification, notices issued prior to June 29, 2001 are not loaded into the database. However, we've added links to sections of the web site that house those notices. These would be notices issued by the former CICMP process and are identified as Release Notifications for Product/Process and Systems. They are found on the current CMP web site at: <http://www.qwest.com/wholesale/cmp/rnarchive.html>

As a follow-up to a notice of last week, we encourage you to subscribe to the notices you need using our web based subscription tool. This allows you to subscribe and/or unsubscribe to the categories of notice listed above. Subscribe at <http://www.qwest.com/wholesale/notices/cnla/maillist.html>

You are encouraged to provide feedback to this notice through our web site. We provide an easy to use feedback form at <http://www.qwest.com/wholesale/feedback.html>. A Qwest representative will contact you shortly to discuss your suggestion.

Sincerely,

Qwest