



<i>Test Vendor ID:</i>	EXP 3094
<i>Qwest Internal Tracking ID:</i>	TI 764
<i>Observation/Exception Title:</i>	Change Management Process not Adhered to
<i>Test Type/Domain:</i>	Test 23 – Change Management
<i>Date Qwest Received:</i>	12/12/2001
<i>Initial Response Date:</i>	12/21/2001
<i>1st Supplemental Response Date:</i>	01/25/2002
<i>2nd Supplemental Response Date:</i>	02/28/2002
<i>3rd Supplemental Response Date:</i>	03/22/2002
<i>4th Supplemental Response Date:</i>	03/28/2002
<i>5th Supplemental Response Date:</i>	04/03/2002
<i>6th Supplemental Response Date:</i>	04/22/2002
<i>7th Supplemental Response Date:</i>	05/03/2002

Test Incident Summary:

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

Exception:

Qwest did not adhere to its established change management process for notifying CLECs about a proposed change, and allowing input from all interested parties.

Background

The Qwest Product/Process Change Management Process (CMP) is the method used by both Qwest and CLECs to introduce and implement changes to Qwest wholesale products and business processes. The Qwest CMP managers are responsible for the administration of Change Requests (CRs) and Notifications, including changes to, and updates of, relevant Qwest documentation. The Qwest Subject Matter Experts (SMEs) are responsible for the products and processes associated with proposed changes.

KPMG Consulting observed an instance in which Qwest did not provide CLECs with complete information about, and a reasonable interval for, a CLEC-impacting CR. On October 17, 2001 Qwest informed CLECs of a Qwest-initiated Process CR PC100101-5 “Clarification of additional testing process” (see Attachment A), which was scheduled for implementation on November 19, 2001¹. At a follow-up meeting on October 31, 2001, CLECs reported to Qwest that the CR would affect their business operations, and that Qwest did not provided adequate information about this CR to answer the following questions:

¹ Information about this CR and supporting documentation (process documentation, process presentation, and Question & Answers) may be found at <http://www.qwest.com/wholesale/cmp/changerequest.html>.



- Regulatory: CLECs requested that Qwest investigate whether or not the proposed CR would comply with Qwest’s legal obligations, such as SGATs and Interconnection Agreements;
- Products: CLECs requested that Qwest provide a list of all products affected by this CR. At the follow-up meeting, Qwest was unsure if the CR would affect line-shared loops; and
- Documentation: CLECs requested that Qwest include the precise wording of the affected Product Catalogue (PCAT) in the CR. In the CR, Qwest provided limited text to describe the new process, and how the changes would affect CLECs.

In order to respond to the remaining CLEC inquiries, Qwest scheduled a follow-up meeting on November 26, 2001, and delayed the scheduled implementation until December 1, 2001.

During CMP Redesign meetings, at least three CLECs made an attempt to halt the implementation date and escalate this CR. Qwest implemented CR PC100101-5 on December 1, 2001, and distributed a notification on December 3, 2001².

The event timeline for the CR that is the subject of this Exception is as follows:

Date	Event
10/17/2001	Qwest presented change request (CR) PC100101-5 "Clarification of additional testing process" at the monthly Change Management meeting.
10/31/2001	Follow-up meeting held – Intended for Qwest to clarify outstanding issues.
11/26/2001	Follow-up meeting held – Qwest answered some of the questions from CLECs.
12/01/2001	Scheduled process implementation date
12/04/2001	Qwest notification about update applied to CEMR User Guide. CLECs issue written statement requesting a status update, and that Qwest immediately stop implementation of this CR.

Issue

KPMG Consulting observed the following issues related to CR PC100101-5:

- Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;
- Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change³;
- Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest’s implementation of this change and requested its immediate suspension.
- Qwest, through the CMP, did not update CR status on a timely basis;
- Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.

² Qwest notification titled “Documentation: CEMR: User's Guide Updated: 12/03/01.”

³ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.



Impact

Qwest did not adhere to its established change management process for notifying CLECs about proposed changes, and allowing input from all interested parties. In this instance, Qwest's failure to conduct thorough research prior to CR initiation necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for proposed changes. Any changes that are implemented without close examination by all interested parties may override Qwest's prior agreed upon service obligations to CLECs.

Qwest Formal Response:

This Exception is premised on KPMG's statement that "Qwest did not adhere to its established change management process for notifying CLECs about proposed changes" in processing the CR at issue. KPMG appears to assume that the process that applies to this CR is the *Interim Qwest Initiated Product/Process Change Request Initiation Process* that was developed in the CMP Redesign Sessions. CLECs have now clearly stated, however, that they never intended for that interim process to apply to the Qwest-initiated change at issue here.

At the time Qwest issued this CR, Qwest believed that this interim process might apply to the testing process clarification and, therefore, in good faith, submitted a CR. However, there was confusion between Qwest and the CLECs regarding the applicability of that interim process. The CLECs subsequently clarified at the December 10-11, 2001 redesign session that they never intended for that interim process to only apply to anything except changes that arose from 271 workshops or OSS testing. The interim process, as clarified by the CLECs and agreed to by Qwest, currently calls for Qwest to initiate CRs *only* for changes that alter CLEC operating procedures (as determined by Qwest), and that are made as a result of third party test or a 271 Workshop. Therefore, under the established change management process, Qwest was not required to submit or process a CR for this issue in the first place. Nonetheless, even though submission of the CR turned out not to be necessary, Qwest submitted a CR in good faith and followed the interim process.

Qwest's responses to each of the five bullet points KPMG raises are set forth below.

KPMG Issue: *Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;*

Qwest Response:

Qwest provided information and answered CLEC questions regarding this CR by introducing CR No. PC100101-5 to the CLEC community through the Change Management Process (CMP). As noted above, at the time Qwest submitted this CR, it did so based on a good faith effort to comply with the *Interim Qwest Initiated Product/Process Change Request Initiation Process*. Since that time, the CLECs have clarified that they want that process to only apply to certain changes arising from 271 workshops or OSS testing. All other Qwest initiated product/process changes will be discussed at future Redesign sessions. At those future sessions, the nature and amount of information that Qwest must provide regarding its product/process CRs will be defined. Thus, Qwest provided more information than was required under existing processes by submitting the CR to the CLECs.

Qwest's efforts to provide information did not stop with submitting the CR. Qwest held at least three meetings with CLECs to provide information and answer CLEC questions relating to the CR. See Chronology of Events below.



KPMG Issue: *Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change⁴;*

Qwest response:

The process for additional testing described in the CR, which was introduced on October 17, 2001, did not change from that time until the time it was fully implemented on December 1, 2001. Thus, the CLECs had more than 6 weeks -- not only 4 days -- to prepare for the change. The chronology below outlines the key notification dates relating to this CR.

Chronology of Events for CR No. PC 100101-5

- 10/17/01 - CMP Meeting: Qwest introduced "Description of Change" and agreed to provide detailed package for CLEC review. Walk through meeting to be scheduled by Qwest in the late October/early November 2001 time frame.
- 10/26/01 - Notification forwarded to the CLEC community regarding presentation of CR in the October 31, 2001 CMP Re-Design Meeting.
- 10/31/01 - CR presented to the participating CLECs at the CMP Re-Design Meeting. CLECs were requested to provide comments. **Qwest agreed to delay initial implementation date to address CLEC concerns.**
- 11/08/01 - Qwest Notification (Document No. PROD.11.08.R.00197.Mtce&Repair Language; Subject: Update to Product Information on Maintenance and Repair Language within EEL, UDIT, LMC and Unbundled Loop General) transmitted to CLEC community.
- 11/08/01 - PCAT Documents posted to the Qwest Wholesale CMP Document Review website: <http://www.qwest.com/wholesale/cmp/review.html>. Comments from CLEC community due in 15 calendar days (11/23/01), as stated in "Interim External Change Management Process for Qwest Initiated Product/Process Changes," Version 6 – 11/26/01.
- 11/13/01 - Notification transmitted to CLEC community regarding follow-up meeting scheduled for 11/26/01.
- 11/14/01 - CMP Meeting - Qwest advised CLEC community that PCAT documents currently are available for comment.
- 11/24/01 - No comments were received from the CLEC community regarding PCAT documents posted to the Qwest Wholesale CMP Document Review Website.
- 11/26/01 - Qwest conducted a follow-up meeting with the CLEC community to discuss any technical issues with the CR (primarily operational and testing issues). Responses to questions were prepared for posting on the Qwest Wholesale WEB page.
- 11/28/01 - "Questions & Answers for Additional Testing 11/26/01" document posted to Qwest Wholesale website <http://www.qwest.com/wholesale/cmp/changerequest.html>
- 11/28/01 - "Additional Testing Process Document - 11/09/01" and "Additional Testing Process Presentation - 11/09/01" posted to Qwest Wholesale website:

⁴ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.



<http://www.qwest.com/wholesale/cmp/changerequest.html> These documents were previously posted in the Qwest Wholesale CMP Re-Design website:
<http://www.qwest.com/wholesale/cmp/redesign.html>

- 11/30/01 - Qwest IT Wholesale Communicator, November 30, 2001, Document No. SYST.11.30.01.F.02444_CEMR_UG_Update, CEMR User's Guide Update transmitted to Qwest Wholesale Customers
- 12/05/01 - Formal Escalation received from Eschelon regarding implementation of CR.
- 12/06/01 - Qwest response sent acknowledging receipt of Formal Escalation from Eschelon (PC100101-5-E01).
- 12/07/01 - KMC Telecom notified Qwest to participate in the formal escalation initiated by Eschelon.

KPMG Issue: *Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.*

Qwest response: Qwest acted on CLEC input by holding additional meetings and agreeing to delay the original implementation date. Further, the processes that Qwest and the CLECs agreed to use for resolving disagreements are the escalation and dispute resolution processes. CLECs have invoked the escalation process with regard to this CR. In accordance with that process, Qwest responded to the escalation and offered a proposed process for resolving the CLEC concerns. Qwest will continue to abide by the agreed processes for resolving the disagreements relating to this CR and hopes to reach a mutually agreeable solution to the issues.

KPMG Issue: *Qwest, through the CMP, did not update CR status on a timely basis;*

Qwest response:

The CMP database is posted to the website on an "every third day" basis with updated CR status, status history, responses, meeting minutes, etc. for all active CRs. Qwest therefore does not understand KPMG's statement and needs additional detail regarding the specific issue if KPMG needs a more specific response.

KPMG Issue: *Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.*

Qwest response:

The Qwest-initiated CR at issue here does not include rate changes. The purpose of the CR is to clarify that, if a CLEC chooses not to perform diagnostic testing to determine whether trouble resides within the CLEC's network, the CLEC may request that Qwest perform that testing on the CLEC's behalf. Under the process, a CLEC that asks Qwest to test on the CLEC's behalf also authorizes Qwest to charge the CLEC for performing that testing. Qwest proposed to use existing labor rates -- in CLEC interconnection agreements or the SGAT -- for performing the testing. Qwest also offered to enter into an amendment to interconnection agreements to specify the rate if a CLEC preferred to address the issue that way.

KPMG Comments (01/08/2002):

KPMG Consulting reviewed Qwest's response and found that the information presented differs in several ways from KPMG Consulting's understanding of the Interim Product/Process CMP. Qwest stated, in October 2001, that it would submit CRs for changes to products or processes that alter CLEC operating



procedures, and that the Interim Product/Process CMP would govern all Qwest-initiated Product/Process CRs.⁵ KPMG Consulting attended the October 17, 2001 Product/Process CMP Meeting, and observed that Qwest planned to implement PC100101-5 sooner than the 45-day interval that the interim process specifies. CLECs expressly stated that this change would be CLEC-impacting.⁶

KPMG Consulting observed that, on October 31, 2001, Qwest agreed to take the following action items:

- | | |
|-----------------------|---|
| Regulatory: | Qwest would investigate whether or not the proposed CR would comply with Qwest's legal obligations, such as SGATs and Interconnection Agreements; |
| Products: | Qwest would specify the products affected by the proposed CR; |
| Documentation: | Qwest would provide CLECs with the revised PCAT language. |

At the October 31, 2001 meeting, Qwest agreed to change the implementation date from November 19, 2001 to December 1, 2001. This change was made because Qwest planned to address important questions related to the above three topic areas at the follow-up meeting scheduled for November 26, 2001.

In response to CLEC objections, Qwest's legal and change management staffs stated, on November 29, 2001, that Qwest would investigate whether or not the implementation of this change would be suspended. As of December 1, 2001, however, Qwest had not provided CLECs with any status update regarding this CR. Based on information on the Qwest CMP Web site, it was unclear if CR PC100101-5 was going to be suspended, delayed a second time, or implemented on December 1, 2001. In response to a CLEC inquiry regarding the issue, Qwest formally informed CLECs, on December 4, 2001, that CR PC100101-5 had been executed on December 1, 2001, and advised the inquiring CLEC, through an email response, that interested parties should escalate the issue through the formal Change Management escalation procedure.

Based on the above events, KPMG Consulting provides a review each of the major issues included in this Exception:

1. *Following its responses to important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change.*

Appendix A shows that the original CR form lacked specific information about the proposed change. As of October 31, 2001, Qwest had not provided CLECs with details or answers that addressed important regulatory, products, and documentation questions. In addition, KPMG Consulting observed that Qwest had not provided CLECs with draft PCAT documentation until November 8, 2001. In the absence of the above information and/or documentation, CLECs were unable to adequately prepare for the proposed change in advance of its implementation. Qwest's failure to conduct thorough research prior to initiating the CR necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for the proposed change. Based on the above observation, KPMG Consulting respectfully disagrees with Qwest's statement that CLECs had "more than six weeks" to make informed decisions and adapt to the proposed change.

2. *Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change.*

KPMG Consulting observed that Qwest did not provide CLECs with adequate information in advance of the CR implementation. As shown in Appendix A, the original CR form, which CLECs expressly

⁵ *Qwest Corporation's Report on the Status of Change Management Process Redesign before the Public Utilities Commission of the State of Colorado* dated October 10, 2001.

⁶ The draft meeting minutes of the October 17, 2001 Product/Process CMP meeting were included in the November 2001 Product/Process CMP distribution package located at <http://www.qwest.com/wholesale/downloads/2001/011112/ProductProcessNovDistPackage2.pdf>.

stated on October 17, 2001 would impact their business operations, lacked specific information about the proposed change. As of October 31, 2001, Qwest had not provided CLECs with details or answers that addressed important regulatory, product, and documentation questions. In addition, KPMG Consulting observed that Qwest had not provided CLECs with draft PCAT documentation until November 8, 2001, and a follow-up meeting did not take place until November 26, 2001, four days before the CR's actual implementation. Qwest's failure to provide information necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby not affording CLECs adequate time to prepare for the proposed change.

3. *Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.*

KPMG Consulting understands that CLECs have invoked the Escalation Process with regard to the CR in question. Nonetheless, since Qwest did submit a CR through the CMP, the fact that Qwest implemented the change – in spite of CLEC objections – indicates that, within the overall CMP framework, there is a lack of clarity between what Qwest defines as a CR, and a Qwest unilateral notification of process change. In addition, Qwest was unable to answer all CLEC inquiries at the additional meetings held to discuss this CR in more detail. At the November 29, 2001 meeting, it was still uncertain whether or not the change would be implemented on December 1, 2001.

4. *Qwest, through the CMP, did not update CR status on a timely basis.*

Qwest distributed SYST.11.30.01.F.02444_CEMR_UG_Update at 10:39 AM MST on **December 3, 2001** (see Appendix B). On November 29, 2001, Qwest legal and change management staff indicated that Qwest would investigate whether or not the CR would be suspended, but did not provide CLECs with the status update until December 4, 2001, three days after the change had gone into effect. As of December 1, 2001, the CR status report on the Qwest CMP Web site did not indicate if CR PC100101-5 was suspended or implemented.

5. *Qwest CR includes rate changes that are not explicitly defined as within the scope of CMP.*

Qwest's response to this issue stated that the CR, itself, did not result in rate changes. However, the change in question is Qwest's implementation of a new testing process for Maintenance & Repair that results in Qwest's unilateral imposition of labor rates without CLEC agreement. The change potentially does have a significant financial impact on some CLECs. KPMG Consulting is aware that rate changes are not explicitly defined as within the scope of CMP, but would expect all Qwest-initiated CRs to follow the defined CMP Process.

KPMG Consulting did not observe Qwest's offer⁷ to enter into an amendment to interconnection agreements. KPMG Consulting reviewed the *Questions & Answers for Additional Testing 11/26/2001* document, and was unable to locate information to support Qwest's statement.⁸ Instead, KPMG Consulting observed that Qwest repeatedly stated in meetings that the CR was a clarification of existing requirements, thus making an amendment unnecessary. For instance, at the October 31, 2001 meeting, one CLEC asked if Qwest had checked all existing interconnection agreements to ensure that the CR was consistent with Qwest's legal obligations. Qwest replied, "yes," suggesting that no amendment was necessary.

KPMG Consulting recommends that this Exception remain open pending resolution of the above issues.

⁷ Qwest quote from December 21st response: "Qwest also offered to enter into an amendment to interconnection agreements to specify the rate if a CLEC preferred to address the issue that way."

⁸ *The Questions & Answers for Additional Testing 11/26/2001* document is located at http://www.qwest.com/wholesale/downloads/2001/011128/QA_CR_PC100101-5OptTesting112601.doc.

Qwest Response to KPMG Comments (01/25/2002):

This Exception needs to be viewed in the unique context of the interim process for product and process changes in the Change Management Redesign process. During the redesign sessions, there was a misunderstanding regarding the scope of an interim process and the status of the CMP Redesign Team's discussions regarding that process. The redesign misunderstanding uniquely impacted the Additional Testing CR. As a result of that misunderstanding, the Additional Testing CR was initiated pursuant to the interim process established by the redesign team. Because of objections raised by CLECs in the redesign sessions, the Additional Testing CR was then handled pursuant to the process that existed before the redesign sessions began. As a result of the unique situation caused by the redesign misunderstanding, the issues raised in this Exception do not reflect the kind of systemic departure from procedure that is appropriately raised in an Exception. Further, the issues raised in this Exception appear to be confused by the inclusion of CLEC advocacy positions and/or requests in the factual recitation. The relevant facts are set forth below.

- Qwest initiated this CR under the *Interim Qwest Product/Process Change Management Process*.

As Qwest stated in its initial response, at the time Qwest issued this CR, Qwest believed that the *Interim Qwest Initiated Product/Process Change Request Initiation Process* that was developed in the CMP Redesign Sessions might apply to the testing process clarification and, therefore, it submitted the CR. Since that time, it became apparent that the CLECs and Qwest had different understandings regarding the scope of the interim process. The CLECs and Qwest have spent a great deal of time in CMP Redesign Sessions discussing their respective positions regarding the interim process. During these sessions it became clear that the CLECs intended that the interim process should only apply to changes that were generated by the 271 workshops or OSS testing. Qwest agreed to this limitation on the scope of the interim process.

These discussions are reflected in the meeting minutes for the CMP Redesign Sessions held October 30 through November 1, 2001 (see pp. 2-3); November 13, 2001 (see p. 5); and November 27 through November 29, 2001 (see pp. 13-15). Copies of the discussion summaries from these minutes have been provided with this response or they may be located at the following URL under subheading Meeting Minutes, <http://qwest.com/wholesale/cmp/redesign.html>

- Qwest processed this CR in accordance with the interim process until it became clear that the interim process did not apply.

The interim process requires that Qwest post its CR and related documentation to the CMP web site, and discuss it at the CMP Monthly Forum. The CLECs may raise any questions during the discussions and submit written comment through a mechanism on the web site. Any issues that are not resolved can be escalated.

Qwest followed the interim process by issuing the CR, discussing it at the CMP Monthly Forum, and posting the documentation changes on the CMP web site. Qwest also held meetings with the CLECs in addition to the CMP Monthly Forum in which Qwest answered CLEC questions relating to the CR. Qwest received no written comments through the web site mechanism. Qwest responded orally and in writing to the issues the CLECs raised in the several meeting that were held. These actions satisfied the interim process.

For ease of reference, a copy of the Interim Qwest Product-Process CMP document has been provided with this response or can be located at the following URL under Redesign Documentation, <http://qwest.com/wholesale/cmp/redesign.html>



- Qwest has also complied with the existing change management process.

By December 12, 2001, when this Exception was written, it was clear that the interim process did not apply. Thus, Qwest was not required to issue or process any CR in accordance with that process. Because the CMP Redesign team has not agreed to any other product/process procedures, the process that applies is the existing change management process. Under the existing process, Qwest must only provide notice before implementing a change (the existing process document titled Current CICMP has been provided with this response.) Qwest has gone far beyond that simple requirement by issuing the CR, holding several meetings to discuss the CR and answer CLEC questions, and issuing the documentation for comment.

- The remaining issues raised in this Exception do not change the analysis set forth above.

There are other issues raised in this Exception, such as KPMG's statement that there was confusion in the November 29, 2001 CMP Redesign Session regarding whether the CR would be implemented on December 1. The minutes for that meeting do not reflect any such confusion. Moreover, Qwest clearly stated at the end of the conference call held with the CLECs on November 26, 2001 to discuss the CR that it would implement the CR on December 1. There was no reasonable basis for any such confusion.

KPMG also points to a CLEC request for suspension of the CR. It is important to note that neither process required Qwest to delay or cancel implementation simply because a CLEC disagreed with or raised questions regarding Qwest's proposed change. Furthermore, Qwest has reviewed the change management processes of other companies, and no other process in the country, including processes reviewed by KPMG in other tests, includes a requirement that the ILEC suspend a proposed change if a CLEC objects to the change. Instead, any such issue upon which agreement could not be reached is required to be treated in the same way under the existing change management process and the interim product/process change management process: they are to be escalated. That is, in fact, what happened with this CR -- Eschelon and other CLECs initiated an escalation. This was the appropriate method for resolving any unresolved issues under both processes.

KPMG Supplemental Recommendation (02/12/2002):

KPMG Consulting has reviewed Qwest's January 25, 2002 response along with the following referenced documents:

- (a) *Final CMP Redesign Meeting Minutes 10/30/2001 – 11/1/2001;*
- (b) *Final CMP Redesign Meeting Minutes 11/13/2001;*
- (c) *Final CMP Redesign Meeting Minutes 11/27/2001 – 11/29/2001;* and
- (d) *Interim Qwest Product/Process Change Management Process* dated 10/3/2001.

In addition, KPMG Consulting reviewed other meeting minutes and materials relevant to this Exception and available at the Qwest CMP Web site⁹:

- (e) *Draft Meeting Minutes for Product/Process CMP Monthly Meeting 10/17/2001;*
- (f) *Draft Meeting Minutes for Product/Process CMP Monthly Meeting 11/14/2001;*
- (g) *Change Management Process (CMP) Improvements – 11-26-01;*
- (h) *Final CMP Redesign Meeting Minutes 12/10/2001 – 12/11/2001;* and
- (i) *Draft Meeting Minutes for Product/Process CMP Monthly Meeting 12/12/2001.*

KPMG Consulting agrees with Qwest that the subject of this Exception needs to be considered in relation to the applicability of the interim process for product and process changes as part of the Change

⁹ CMP Redesign documents are posted at: <http://www.qwest.com/wholesale/cmp/redesign.html>



Management Redesign Process. Qwest has indicated, in its previous responses, that it believes that a Qwest CR was not necessary for this process change based on the scope and requirements of the Interim Product/Process CMP. Based upon discussions that were held November 27 – 29, 2001 and again on December 10 – 12, 2001, Qwest believed that the interim process applied only to changes related to Third Party Testing and to 271 workshops.

KPMG Consulting issued this Exception following an extensive review of facts and circumstances. In particular, KPMG Consulting published this Exception after December 1, 2001, the Qwest-scheduled implementation date for this process change, in order to observe the complete set of circumstances, processes, and activities related to CR PC100101-5. The Exception identifies a deficiency in the Change Management Process that will result in a negative comment for one or more of the evaluation criteria in the Final Report if left unresolved.

The specific process issues that KPMG Consulting has identified in this Exception include:

1. Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;
2. Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four business days for CLECs to prepare for the proposed change¹⁰;
3. Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension;
4. Qwest, through the CMP, did not update the CR's status on a timely basis;
5. Qwest's CR includes rate changes that are not explicitly defined to be within the scope of CMP.

KPMG Consulting provided a detailed review of each of these discussion items in the first response to this Exception on January 7, 2002. In its January 25, 2002 response, Qwest raised additional concerns surrounding the unique situation for the Additional Testing CR and for Change Management Redesign. KPMG Consulting offers additional comments to clarify the facts and background regarding the issuance of this Exception.

- **Qwest initiated the CR under the *Interim Qwest Product/Process Change Management Process*.**

Qwest implemented the Interim Product/Process CMP on October 17, 2001, the same day that Qwest first presented CR PC100101-5 for discussion with CLECs. According to the minutes from this meeting, Qwest stated that it had intended to issue a notification instead of a CR in order to implement the proposed change in 15 days instead of 45 days. Qwest had brought the issue forward as a CR in good faith for CLECs to have adequate advance review. Several CLECs stated that the proposed change would be CLEC-impacting, and requested Qwest to provide CLECs with complete information about the proposed change before counting days as part of the defined 45 day interval for notifying CLECs, for soliciting CLEC input, and for finalizing the change. Qwest later reaffirmed that the interim process for Qwest-initiated CRs was meant for all Qwest product/process changes that altered CLEC operating procedures¹¹.

- **As of December 12, 2001, it was still unclear that the interim process did not apply. KPMG Consulting's understanding is that the interim process was in effect during the period in question (i.e., October 17, 2001 through December 12, 2001).**

Although Qwest stated on October 31, 2001 that it would delay implementation of the CR in question on December 1, 2001 to address CLEC concerns, Qwest had not resolved all of the regulatory, product, and documentation questions and scheduled another follow-up meeting for November 26, 2001. Meeting

¹⁰ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.

¹¹ See Final Meeting Minutes, CMP Process Re-design, October 30 – November 1, 2001.

minutes indicate that the discussion about the disagreement over the interim process had not begun until November 27, 2001, after Qwest had already scheduled implementation of CR PC100101-5. In this case, Qwest scheduled the change implementation date prior to making complete information available to CLECs and receiving their comments.

Based on a review of the minutes from the three Change Management Redesign sessions held prior to the CR's implementation, KPMG Consulting believes that CLECs and Qwest did not reach consensus about the degree of decision-making authority CLECs would have in modifying or suspending Qwest-initiated CRs¹². In fact, it was in response to the objections with this CR and the degree of input into the process that the CLECs considered limiting the scope of the interim process in December.

KPMG Consulting does not consider meeting minutes which provide written record of opinions and open discussion about the Change Management development to serve as a proxy for the formalized process that was in place at the time that this change occurred. Furthermore, there does not appear to be conclusive language in the minutes to suggest that the Interim process did not apply as of December 1, 2001.

Qwest issued two documents that suggest the approach for Qwest-initiated process CRs had not changed. One document lists all CMP improvements that were effective or scheduled to be implemented as of November 26, 2001¹³. The Qwest-initiated Product and Process CR Process is cited as being implemented October – November, 2001. The other document describes the process by which baseline elements of the redesign effort may occur prior to the completion of the CMP redesign effort¹⁴. The document states that implementing baseline changes requires agreement among Core Team members and an implementation presentation for the general CLEC community.

KPMG Consulting considers Change Management to be an essential element of ongoing CLEC business operations and of the Qwest-CLEC business relationship. Because it governs an important part of all CLEC interaction with Qwest, KPMG Consulting would expect, at a minimum, that Qwest CMP would feature the following functions:

- Qwest notifies CLECs of all CLEC-impacting changes with complete information and sufficiently in advance of such changes;
- CMP includes the procedures through which Qwest takes into consideration the feedback from CLECs on all proposed CLEC-impacting changes; and
- CLECs have the opportunity to modify, discuss, and escalate issues encountered with proposed changes.

In response to this Exception, Qwest stated that it was not aware of CLEC objections to CR 100101-5 because Qwest did not receive any written comments through the Web-based PCAT documentation review mechanism. However, the Redesign meeting minutes clearly demonstrate that CLECs were dissatisfied with both the change in question and with the overall process for managing Qwest-initiated CRs. Qwest Change Management representatives, who act as Qwest's point of contact, were present at these meetings. After having heard CLEC objections, none of the Qwest representatives had advised CLECs to escalate the CR in question until December 4, 2001¹⁵, three days after implementation, thus leaving CLECs wondering if Qwest was going to respond to CLECs by suspending the proposed change.

¹² Quote from *Final CMP Redesign Meeting Minutes 11/13/2001*: "Schultz cited that there did not appear to be agreement between the CLEC community concerning the Qwest initiated product/process CR process."

¹³ See Appendix B: *Process to Deploy Qwest CMP Improvements – 11-26-01*.

¹⁴ See Appendix C: *Change Management Process (CMP) Improvements – 11-26-01*.

¹⁵ In response to CLEC inquiry to Judy Schultz and Laura Ford, Qwest advised Eschelon to escalate the CR in question in an email dated December 4, 2001, at 7:13 PM.



Due to differences in scope and history among ILEC change management processes, KPMG Consulting considers it inappropriate to compare Qwest CMP to that of other ILECs. As part of 271 OSS Testing effort, KPMG Consulting is evaluating Qwest CMP based on a pre-determined framework of evaluation criteria. Based on Qwest's latest response and the current state of Product/Process CMP, at least one KPMG Consulting evaluation criteria for Test 23 would be assessed "Not Satisfied." KPMG Consulting points to the CLEC request for suspension of the CR as an example of the collaborative extent of CMP and the ineffectiveness of the process to address disputes such as this. The Exception is not based on a requirement that an ILEC suspend a proposed change if the CLEC objects to the change.

KPMG Consulting considers the fact that Qwest implemented CR PC100101-5 without taking into consideration CLEC objections, its failure to make available complete information sufficiently in advance of the scheduled change, as well as the subsequent impasse¹⁶ about the process governing Qwest-initiated changes as indicative of lack of a defined and documented change management process.

KPMG Consulting reviewed aforementioned documents and identified that Qwest did not adhere to the expectations of a well-formed, functioning Qwest-CLEC change management process.

KPMG Consulting recommends that this Exception remain open pending implementation of and observation of adherence to a complete process for Qwest-initiated Product and Process Change Requests.

Qwest Response to KPMG Supplemental Recommendation (02/28/2002):

Qwest is currently working in collaboration with CLECs to develop its change management process for product/process changes. Qwest's proposed process for such changes is attached. This proposal has not yet been fully discussed and has not yet been agreed to in the redesign process. Qwest will supplement its response to this Exception when the process is more fully developed.

Qwest Supplemental Response to KPMG Supplemental Recommendation (03/22/2002):

During the March 18-19, 2002 CMP redesign session, Qwest and CLECs agreed that Qwest will implement the Qwest-initiated product/process change management process, as modified during the redesign session, as an interim process as soon as practicable.

In addition, the redesign team agreed that Qwest and CLECs will continue to evaluate and modify that process. The redesign team will review product/process notices issued over the last few months in order to make the list of categories in each of the four "Levels" of product/process changes more exhaustive. The redesign team expects this initial effort to be completed by April 16, 2002. After this review, CLECs and Qwest will baseline the interim process. Qwest will then insert it into the Qwest Wholesale Change Management Process Document and implement it as modified.

Qwest will implement the Interim Qwest-Initiated Product/Process Change Management Process on or before April 1, 2002. The interim process can be found on Qwest's wholesale web site at www.qwest.com/wholesale/cmp/whatiscmp.html.

Qwest Supplemental Response (03/28/2002):

Qwest committed to the following action item in the 3/22/02 response:

¹⁶ KPMG Consulting observed that Qwest and CLECs were at impasse about Qwest-initiated Product/Process changes from December 2001 to February 2002.



“Qwest will implement the Interim Qwest-Initiated Product/Process Change Management Process on or before April 1, 2002. The interim process can be found on Qwest's wholesale web site at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>.”

Qwest has implemented the Interim Qwest-Initiated Product/Process Change Management Process for product/process changes that are initiated on or after 4/1/02.

KPMG 2nd Supplemental Recommendation (03/29/2002):

KPMG Consulting attended the March 20, 2002 Product/Process CMP Meeting and observed that Qwest advised CLECs during the meeting that, starting April 1, 2002, Qwest would implement an *ad hoc* process to manage Qwest-initiated Product/Process changes. It is KPMG Consulting's understanding that this *ad hoc* process remains subject to further development, modifications, and negotiations in CMP Redesign (See <http://www.qwest.com/wholesale/cmp/whatiscmp.html>).

KPMG Consulting recognizes that Qwest and CLECs have yet to agree on key components of a comprehensive Product/Process CMP but that parties have come to a conceptual consensus in a number of areas (Please refer to Attachment 1 – *Concepts Agreed Upon as of the March 18-19, 2002 Redesign Session*). Due to the current test schedule, it is unlikely that KPMG Consulting will be able to evaluate the final, agreed-upon process that will result from CMP Redesign. The CMP Redesign meetings are currently scheduled to continue through June 2002.

KPMG Consulting recommends that this Exception remain open pending implementation of and observation of adherence to a complete process for Qwest-initiated Product and Process Change Requests.

Qwest Response to KPMG 2nd Supplemental Recommendation (04/03/2002):

As KPMG has noted, the parties to the Change Management Redesign meetings have reached agreement in principle on a process for Qwest-originated product and process changes. At the March 20, 2002 Product/Process CMP Meeting, Qwest advised CLECs during the meeting that, starting April 1, 2002, Qwest would implement an interim process to manage Qwest-initiated Product/Process changes. The parties to the Change Management Redesign Process agreed upon the interim process and agreed that Qwest would implement the interim process. The interim process is consistent with the agreements in principle between the parties concerning product and process changes. Although this process remains subject to further development, modifications, and negotiations in CMP Redesign, the CLECs have agreed to implementation of this process with changes on an 'as needed basis only' as redesign discussions continue.

With the implementation of the interim process for Qwest-initiated product and process changes, along with the process that Qwest implemented last year for CLEC-initiated product and process changes, Qwest's CMP processes for product and process changes are more complete and comprehensive than any other CMP process in the country. Furthermore, the FCC's 271 orders have focused on change management for OSS systems, and not on change management for product and process changes.

Due to the current schedule of this test, Qwest requests that KPMG Consulting conduct no further testing. Qwest does not believe the remaining unresolved issues warrant an extension of the test time line. Qwest recognizes this will not allow KPMG to observe implementation of and observation of adherence to the process for Qwest-initiated Product and Process Change Requests that is the final product of the Change Management Redesign process.



KPMG Disposition Report (04/04/2002):

Summary of KPMG Consulting's Retest Activities and Results:

KPMG Consulting recognizes that Qwest and CLECs have yet to agree on key components of a comprehensive Product/Process CMP. Qwest implemented an *ad hoc* process to manage Qwest-initiated Product/Process changes as of April 1, 2002. Although CLECs and Qwest have reached an "agreement in principle" for this interim process, it is KPMG Consulting's understanding that the referenced process remains subject to further development, modifications, and negotiations in CMP Redesign. KPMG Consulting is not able to conduct a thorough evaluation until the prescribed process is formalized, the Redesign sessions are complete, and the process is fully implemented and confirmed. However, the current schedule is for Redesign meetings to continue until June, 2002.

Qwest has requested that KPMG Consulting conduct no further testing. Since the ad hoc process is not final and third party testing is concluding, KPMG was unable to conduct retesting to ensure that a complete and functioning Product/Process CMP was in place.

KPMG Consulting recommends that Exception 3094 be closed unresolved.

Qwest Response to KPMG Disposition (04/22/2002):

At the April 16, 2002 Change Management Redesign meeting, Qwest and the CLECs reached agreement on a process for Qwest-originated product and process changes. This process supersedes the previously agreed to interim process. The agreements have been incorporated into the Master Redlined CLEC-Qwest CMP Redesign Framework – Revised 04-16-02 in section 5.4 Qwest Initiated Product/Process Changes. The updated document has been posted on Qwest's Change Management Process (CMP) website (<http://www.qwest.com/wholesale/cmp/redesign.html>).

Qwest requests KPMG Consulting review the updated Master Redlined document to confirm formalization of the process. Qwest understands that KPMG Consulting will not be able to observe adherence to the process, however, KPMG Consulting can confirm the prescribed process is formalized and the Redesign sessions are complete for Product/Process CMP. Qwest requests KPMG Consulting reconsider the disposition of this exception and if there is an opportunity to observe adherence, Qwest will notify KPMG.

KPMG 4th Supplemental Recommendation (04/25/2002):

KPMG Consulting reviewed the *Master Red-Lined CLEC-Qwest CMP Redesign Framework* document,¹⁷ dated April 16, 2002, and acknowledges that the draft document includes a revised process for Qwest-originated product and process changes. The relevant section of the CMP is included with this Exception response as Appendix D. The revised documentation reflects changes based on Qwest-CLEC discussions and the CMP Redesign collaborative meetings that have been conducted to-date. It is KPMG Consulting's understanding that the draft CMP document and associated sub-processes continue to be discussed and negotiated as part of the CMP Redesign working sessions.

KPMG Consulting, based on its monitoring of recent CLEC-Qwest communications, observes that the Product and Process CMP is not yet fully implemented. In written exchanges with at least one CLEC, Qwest clarified that, as of April 19, 2002, it was unable to follow the interim process that went into effect on April 1, 2002 (see confidential Appendix E) because the new process had just been agreed to in the prior

¹⁷ The *Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft – (Revised 04-16-02)* document is available on the Qwest CMP Web site at <http://www.qwest.com/wholesale/downloads/2002/020418/MasterRedlinedCLEC-QwestCMPRedesignFrameworkRevised04-16-02.doc>



two to three weeks. KPMG Consulting has been unable to observe the documented process in practice due to a lack of change activity to which the revised Product and Process CMP has been applied. Therefore, KPMG Consulting is not able to evaluate the adequacy of, or Qwest's adherence to, the newly established process.

KPMG Consulting recommends that the status of Exception 3094 be changed from "closed, unresolved" to "open," pending full implementation of, and adherence to, a complete process for Qwest-initiated Product and Process changes.

Qwest Response to KPMG 4th Supplemental Recommendation (05/03/2002):

Qwest and KPMG discussed this Exception on the O&E call conducted on Tuesday, April 30, 2002. During that call, Qwest agreed to provide supplemental information.

As discussed on the call, Qwest agreed to implement the CMP Qwest Initiated Product/Process Changes procedures for changes initiated on or after April 1, 2002. As of April 26, 2002, Qwest has initiated 7 such changes. All changes were processed in accordance with the agreed upon procedures. A record of these notifications is provided in the attachment. Additionally, these notices are available on Qwest's Wholesale CMP website (under the Product, Process, or Training categories) at the following URL: <http://www.qwest.com/wholesale/notices/cnla/>.

It should be noted that there are changes that were initiated within Qwest prior to April 1, 2002 which have not yet been published to the CLECs. The CLECs agreed that changes initiated within Qwest prior to April 1, 2002 will not be subject to the CMP Qwest Initiated Product/Process Changes procedures. Two such changes are Access to Emergency Services, which is scheduled for publication on May 10, 2002 and Bona Fide Request/Special Request, which is also scheduled for publication on May 10, 2002.

Attachments: ROC_TI764_EXP3094_Attachment_05_03_02.xls



APPENDIX A

Co-Provider Change Request Form

Log # PCCR100101-5 Status: Submitted
Submitted By: Debra Smith Date Submitted: 10/01/01
Co-Provider:
Submitter: Debra Smith, Qwest Unbundled Loop Product Manager, dssmith@qwest.com, 515-241-1206
Internal Ref#
Name, Title, and email/fax#/phone#

Proprietary for submission to Account Manager Only? Please check mark 4 as appropriate
[] Yes [] No

Title of Change:
Clarification of Additional Testing Process

Area of Change Request: Please check mark 4 as appropriate and fill out the appropriate section below
[] System [] Product [X] Process

System Change Request Section

Interfaces Impacted: Please check mark 4 as appropriate
[] CEMR [] IMA EDI [] MEDIACC [] TELIS
[] EXACT [] IMA GUI [] Product Database [] Wholesale Billing Interfaces
[] HEET [] Directory Listings [] Other Please describe

Description of Change:

Is new information requested in a specific screen or transaction?
[] Yes [] No
If yes, name the screen or transaction:

Products Impacted: Please check mark 4 as appropriate and also list specific products within product group, if applicable
[] Centrex [] Resale
[] Collocation [] SS7
[] EEL (UNE-C) [] Switched Services
[] Enterprise Data Services [] UDIT
[] LIDB [] Unbundled Loop
[] LIS [] UNE-P
[] LNP [] Wireless
[] Private Line [] Other
Please describe Please describe

Known Dependencies:



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Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

High Medium Low

Desired Implementation Date: ASAP- High

Product Change Request Section

Products Impacted: Please check mark 4 all that apply (if "Other" please describe further)

- | | | | | |
|---|---|--|---|--|
| <input type="checkbox"/> LIS/Interconnection | <input type="checkbox"/> Collocation | <input type="checkbox"/> UNE | <input type="checkbox"/> Ancillary | <input type="checkbox"/> Resale |
| <input type="checkbox"/> EICT | <input type="checkbox"/> Physical | <input type="checkbox"/> Switching | <input type="checkbox"/> AIN | |
| <input type="checkbox"/> Tandem Trans./TST | <input type="checkbox"/> Virtual | <input type="checkbox"/> Transport (incl. EUDIT) | <input type="checkbox"/> DA | |
| <input type="checkbox"/> DTT/Dedicated Transport | <input type="checkbox"/> Adjacent | <input type="checkbox"/> Loop | <input type="checkbox"/> Operation Services | |
| <input type="checkbox"/> Tandem Switching | <input type="checkbox"/> ICDF Collo. | <input type="checkbox"/> UNE – P | <input type="checkbox"/> INP/LNP | |
| <input type="checkbox"/> Local Switching | <input type="checkbox"/> Other _____ | <input type="checkbox"/> EEL (UNE-C) | <input type="checkbox"/> Other _____ | |
| <input type="checkbox"/> Other _____ | | <input type="checkbox"/> UDF | | |
| | | <input type="checkbox"/> Other _____ | | |

Description of Change:

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

High Medium Low

Desired Implementation Date: _____

Process Change Request Section

Area Impacted: Please check mark 4 as appropriate

- Pre-Ordering
- Ordering
- Billing
- Repair Other _____
- Please describe

Description of Change:

Currently, CLECs' are responsible for testing UNE's prior to submitting a trouble report to Qwest. CLECs' are to provide test diagnostics including specific evidence that the trouble is in the Qwest Network along with the associated Qwest circuit identification number. If the CLEC elects not to perform the necessary UNE testing, Qwest will offer to do such testing on CLECs' behalf. If such testing is requested by the CLEC, Qwest will perform the additional testing and bill the CLEC the appropriate charges that are in their Interconnection agreement. If the CLEC does not provide test diagnostics and elects not to have Qwest perform additional testing on their



ROC Observation & Exception Formal Response

behalf, Qwest will not accept a trouble report. Additional Charges may apply when the testing determines the trouble is beyond the Loop Demarcation Point
This additional testing option is available on the Unbundled Loop Product Suite, Unbundled Dedicated Transport (UDIT), Enhanced Extended Loop (EEL) and Loop Mux.

Products Impacted: Please check mark 4 as appropriate and also list specific products within product group, if applicable

- | | |
|---|--|
| <input type="checkbox"/> Centrex _____ | <input type="checkbox"/> Resale _____ |
| <input type="checkbox"/> Collocation _____ | <input type="checkbox"/> SS7 _____ |
| <input checked="" type="checkbox"/> EEL (UNE-C) _____ | <input type="checkbox"/> Switched Services _____ |
| <input type="checkbox"/> Enterprise Data Services _____ | <input checked="" type="checkbox"/> UDIT _____ |
| <input type="checkbox"/> LIDB _____ | <input checked="" type="checkbox"/> Unbundled Loop _____ |
| <input type="checkbox"/> LIS _____ | <input type="checkbox"/> UNE-P _____ |
| <input type="checkbox"/> LNP _____ | <input type="checkbox"/> Wireless _____ |
| <input type="checkbox"/> Private Line _____ | <input type="checkbox"/> Other _____ |
| Please describe | Please describe |

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

High Medium Low Desired Implementation Date: _____

This Section to be Completed by Qwest CICMP Manager

Qwest Account Manager Notification

Account Manager: _____ Notified: _____

Qwest CICMP Manager Clarification Request

Yes No

If yes, clarification request sent: _____ Clarification received: _____

Co-Provider Industry Team Clarification Request

Yes No

If yes, clarification request sent: _____ Clarification received: _____

Status, Evaluation and Implementation Comments:

10/01/01 – CR received by Deb Smith of Qwest
10/01/01 – CR status changed to Submitted
10/01/01 – Updated CR sent to Deb Smith

Candidate for a Release

Yes No

If yes, Release Number: _____



APPENDIX B

Process to Deploy Qwest CMP Improvements– 11-26-01

As Change Management Process redesign elements (major sections of the Master Redlined CMP Redesign framework) are discussed and baseline language is determined, Qwest and/or a CLEC-Core Team representative may propose to implement the baseline element. This request may occur prior to the completion of the CMP redesign effort. The CMP Redesign Core Team shall comply with the following process for implementing baseline changes:

- The Core Team reaches agreement to implement a given baseline element and determines the implementation date.
- Qwest develops an implementation presentation for the general CLEC community.
 - The Implementation Presentation shall include:
 - Language from the master redlined CMP framework
 - Other pertinent information, if applicable
 - Implementation/effective date
- At the next Monthly CMP meeting, Qwest and the Re-design Core Team will collectively present the proposed change. The Team shall seek comments, if any, from the general CLEC community.
- If there are no objections, Qwest shall implement the changes in accordance with the implementation plan.
- If there are objections, the Re-design Core Team will consider the input, and determine the appropriate course of action.

At the conclusion of the Re-design effort, the Core Team will present the Final Master Red-Line document to the general CLEC community for review and acceptance.



APPENDIX C

Change Management Process (CMP) Improvements – 11-26-01

Improvement	Implementation Date(s)
Standard Naming Convention	August 2001
Web Site Improvements - Design - Search Capabilities	October 2001
CMP Process Improvements - CR Clarification Meetings - Meeting Distribution Package - Meeting Minutes - CR Tracking and Reporting Database - CR Project Management	August – November 2001
Escalation and Dispute Resolution Process - Process - Web Site	November 2001
Exception Process	September 2001
OSS Interface 12 Month Development View	November 2001
CLEC/Qwest Initiated OSS Interface CR Process - Process - Form	October – November 2001
CLEC/Qwest Initiated Product and Process CR Process - Process - Form	October – November 2001
PCAT Red-Line	November 2001
Tech-Pub Red-Line	October 2001
Point of Contact List	October 2001
Established CMP Full Day Meetings	October 2001
Prioritization of Qwest Originated OSS Interface CRs	August – November 2001
Introduction of New OSS Interface	Ready when applicable
Web Tool to Support CLEC Comments on CRs	November 2001
Retirement of OSS Interface	Ready when applicable
Changes to an Existing OSS Application to Application Interface - Draft Technical Specifications Walkthrough - CLEC Comment Cycle - Final Technical Specifications - CLEC Testing	Effective with IMA 10.0 Release
Changes to an Existing GUI - Draft User Guide - CLEC Comment Cycle - Final User Guide	Effective with IMA 10.0 Release
OSS IMA EDI Versioning	In Effect
Interface Testing Environment - SATE	In Place