

**TI 828**  
**EXCEPTION 3111 – DISPOSITION REPORT**  
Qwest OSS Evaluation

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Initial Release Date (of O3067): December 12, 2001  
First Response Date (to O3067): January 6, 2002  
Second Response Date(to O3067): January 30, 2002  
Initial Release Date (of E3111): January 30, 2002  
First Response Date (to E3111): March 19, 2002  
Second Response Date (to E3111): March 27, 2002  
Disposition Report Date (of E3111): April 4, 2002

Exception 3111 was initially released as Observation 3067 on December 12, 2001. KPMG Consulting recommended on January 30, 2002 that Observation 3067 be closed and moved to Exception 3111.

### **EXCEPTION DISPOSITION REPORT**

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

#### **Exception:**

**Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs); criteria are not defined for developing the scope of an OSS Interface Release Package.**

#### **Summary of Exception:**

KPMG Consulting identified that Qwest lacked documented guidelines for the CR Prioritization Process of major software releases, specifically:

- (1) Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs;
- (2) Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release;
- (3) Detailed business analyses and system analyses from Qwest software development team were not performed for all CLEC-initiated CRs;
- (4) Qwest documents lacked definitions and criteria for the Level of Effort (LOE, formerly known as “T-shirt size”) assignment for individual CRs; and
- (5) Qwest documents lacked information on how Qwest identified CR packaging options for a software release that it recommended to CLECs, following the CR Prioritization Process.

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Criteria for use by Qwest's software development teams to develop the priorities, capacity, and capabilities of a software release were neither documented nor fully defined. The lack of established and documented development criteria, and a clear process for Qwest resource allocation for wholesale OSS, may result in the Qwest software development teams' overlooking and/or ignoring CRs deemed important to CLECs, as determined by the results of the prioritization process. Failure on the part of Qwest to attend to CRs that CLECs deem critical to their business operations in a timely manner could result in lengthy delays in implementing these changes. This would prevent CLECs from receiving important order and pre-order functionality, thus inhibiting their ability to compete in the local exchange carrier market.

**Summary of Qwest's Initial and Supplemental Responses:**

Qwest's responses to Observation 3067 indicated that it had not documented the roles and responsibilities of the IT staff that conduct detailed business and system analyses of CLEC-initiated systems CRs. The amount of business information that Qwest communicates to CLECs prior to the CR Prioritization Process, such as release capacity and LOE definitions, was subject to ongoing Qwest-CLEC negotiation in the CMP Redesign Process. In addition, Qwest also stated that it did not have a systematic and consistent process to determine the CR packaging options that it recommended to CLECs, following the CR Prioritization Process. Based on the above information, KPMG Consulting closed Observation 3067 and issued Exception 3111.

Qwest subsequently developed documentation that details relevant internal IT processes, as well as the roles and responsibilities of the IT personnel involved in the analysis of CLEC-initiated systems CRs. In addition, Qwest and CLECs have negotiated the amount of release capacity and LOE information, both now defined in terms of person hours, that Qwest will disclose prior to the CR prioritization vote. Qwest indicated on February 12, 2002 that it would provide release capacity information, for use in the prioritization process, starting with IMA 11.0 and SATE 11.0.

Qwest reported during the Observation and Exception Focused call held March 21, 2002 and again in its March 27, 2002 and April 3, 2002 written responses to Exception 3111 that it adhered with each phase of the prioritization and packaging processes for major systems releases and that these processes were in place and agreed to via CMP at the time of execution of the process.

**KPMG Consulting's Disposition Report (04/04/2002):**

**Summary of KPMG Consulting's Retest Activities:**

KPMG Consulting identified five issues in Exception 3111 that related to inadequate processes and a pattern of information-sharing that prevented CLECs from making informed decisions

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during the CR Prioritization Process for Change Management. KPMG Consulting conducted a retest by reviewing Qwest-provided documentation and by observing Change Management activity and meetings up through April 4, 2002. Due to the current schedule of this test, KPMG Consulting will be unable to observe the complete prioritization and packaging processes, as now documented, for IMA Release 11.0 or SATE 11.0.

**Summary of KPMG Consulting's Retest Results:**

KPMG Consulting reviewed various internal documents, verifying that Qwest had adequately addressed each of the five issues raised in this Exception through documentation modifications and enhancements to the process. However, KPMG Consulting observed that Qwest and CLECs had not finalized the prioritization and packaging processes before prioritization for IMA Release 10.0 took place. Therefore, adherence to the new process was unable to be confirmed for at least two of the original issues raised in Exception 3111 - issue reference numbers (2) and (5).

Exception 3111 was the subject of the Focus Call on March 21, 2002. Qwest requested that KPMG Consulting review IMA Release 10.0 to test its applicability to the current processes since packaging for IMA Release 11.0 is not scheduled to occur until after the conclusion of OSS 271 Third Party Testing. KPMG Consulting stated in its March 27, 2002 response that there are several areas where the new prioritization and packaging process was either not established, or not followed, for IMA 10.0. Since the process was not completely established and followed for IMA Release 10.0, and packaging and prioritization for Release 11.0 is scheduled to occur beyond the completion of this Test, KPMG Consulting was unable to test adherence to the complete prioritization and packaging process for a new IMA Release.

Given the significance of prioritization and packaging processes in allocating IT resources and managing overall changes applied to Qwest Wholesale OSS interfaces, KPMG Consulting cannot reach a definitive conclusion regarding current processes without verifying the participants' adherence. Qwest requested on April 3, 2002, that KPMG Consulting conduct no further testing related to this Exception. Qwest recognized that this will not allow KPMG to observe Qwest's adherence to the complete end-to-end prioritization and packaging processes for a single major system release.

**KPMG Consulting recommends that Exception 3111 be closed inconclusive.**