

TI 616
EXCEPTION 3061—DISPOSITION REPORT
Qwest OSS Evaluation

Initial Release Date: October 9, 2001
First Release Date: November 28, 2001
Second Release Date: February 6, 2002
Third Release Date: February 19, 2002
Disposition Release Date: March 14, 2002

EXCEPTION DISPOSITION REPORT

Exception:

Qwest provisioned Firm Order Confirmations (FOCs) for Resale PBX orders in a timeframe that was not in compliance with PID PO-5B¹.

Summary of Exception:

The Qwest Service Performance Indicator Definition (PID) PO-5B established the benchmark for the receipt of FOCs on Non-Flow-Through Resale PBX orders. The benchmark for this PID indicates that, for at least 90% of these orders, Qwest is to provide FOCs within 48 hours of order submission, whenever the orders are for 24 trunks or less.

In its Initial Release on October 9, 2001, the P-CLEC received 39 Non-Flow-Through Resale PBX orders. For 28 of those orders (72%), Qwest provided FOCs within 48 hours of order submission. For the remaining 11 (28%), Qwest provided FOCs in a time period greater than 48 hours after the orders had been submitted.

During the first retest, Qwest provided 3 FOCs. Two of these confirmations were provided in a time period greater than 48 hours after the orders had been submitted.

During the last retest KPMG Consulting received 13 FOCs where only 11 were returned within the 48-hour commitment. This equate to an 85% FOCs on time performance.

Summary of Qwest Responses:

Qwest has investigated the LSRs referenced in the first release of this exception and on the various responses. The following were identified as causes for the delay in providing FOCs:

1. LSRs routed to the incorrect work group for processing;
2. LSR routed to the correct center, however, Qwest missed the 48-hour FOC commitment; and
3. LSR was a cancel supplement request and the cancellation notice was sent late.

¹ *Qwest Service Performance Indicator Definitions, ROC 271 Working PID, Version 3.0, May 31, 2001.*

TI 616
EXCEPTION 3061—DISPOSITION REPORT
Qwest OSS Evaluation

Qwest reviewed the P-CLEC's responses for the last retest and concluded the following:

1. The PO-5B measure is disaggregated between LSRs submitted via IMA GUI and via IMA EDI. At a product level, PO-5B is further divided by a) Resale services and UNE-P POTS, b) Unbundled Loops and specified Unbundled Network Elements, and c) LNP. Resale PBX trunks are included in the first product category, Resale Services and UNEP POTS. Therefore, Qwest did not believe it was appropriate to further subdivide the measure.
2. Qwest met PO-5B-1a in every month since July 2001. Qwest met PO-5B-2a from June through November. Qwest did miss PO-5B-2a in December with a result of 88.37%. Qwest believes that would demonstrate consistent performance on these measures.
3. At an aggregated CLEC level, Qwest has not missed either of the PO-5B Resale PID measures (PO-5B-1a and PO-5b-2a) since July 2001 when one state was missed with a result of 89.28% against a 90% benchmark. Therefore, Qwest believed that the aggregate CLEC results also indicate satisfactory and consistent performance on these measures.

Qwest believes that achieving an 85% on the PO-5B for PBX against a benchmark of 90% does not constitute an "impediment" to the CLEC's ability to compete. Qwest will rely on commercial results to show its ability to provide timely FOCs and requested that KPMG close this exception as "Closed/Unresolved".

KPMG Consulting's Responses (03/14/02):

KPMG Consulting reviewed Qwest's response for this exception and acknowledges that PID PO-5B includes both Resale PBX, and Resale & UNE-POTS. However, Non-flow through Firm Order Confirmations (FOCs) for Resale POTS has a benchmark of 24 hours while Non-flow through Firm Order Confirmations (FOCs) for PBX services has a benchmark of 48 hours.

KPMG Consulting's experience with the receipt of Firm Order Confirmations (FOCs) during the last retest indicates that existing Qwest systems and procedures do not provide Firm Order Confirmation within the requirements of PID PO-5B.

KPMG Consulting understands that Qwest will rely on commercial results to demonstrate its ability to provide timely FOCs for resold PBX services. KPMG Consulting acknowledges Qwest's request to close this exception as unresolved.

Based on Qwest's formal response, subsequent focus call discussions, and Qwest's request, KPMG Consulting recommends Exception 3061 be closed as Unresolved.