



<i>Test Vendor ID:</i>	EXP 3061
<i>Qwest Internal Tracking ID:</i>	TI 616
<i>Observation/Exception Title:</i>	Non-Compliant Timeframe - FOCs for Resale PBX
<i>Test Type/Domain:</i>	Test 12 – POP Functionality
<i>Date Qwest Received:</i>	10/09/2001
<i>Initial Response Date:</i>	10/16/2001
<i>Supplemental Response Date:</i>	12/06/2001
<i>2nd Supplemental Response Date:</i>	02/13/2002
<i>3^d Supplemental Response Date:</i>	03/05/2002

Test Incident Summary:

An Observation has been identified as a result of P-CLEC activities related to Test 12, Evaluation of POP Functionality and Performance Versus Parity Standards and Benchmarks.

Exception:

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

Background:

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 less¹.

To date, the P-CLEC has submitted 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.

KPMG Consulting has provided examples of the orders receiving FOCs in a timeframe that is greater than 48 hours after the orders have been submitted in a separate confidential document.

Issue:

Receiving FOCs in a time period greater than 48 hours after orders have been submitted could delay a CLEC from providing timely service to a customer. This could decrease a customer's level of satisfaction for a CLEC, and could increase operating costs because of the additional resources required to investigate the issue.

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



Qwest Formal Response:

Qwest has investigated the 11 LSRs referenced in this exception. Qwest has determined that these LSRs were initially routed to the incorrect work group for processing. Once the LSRs were received in the appropriate work group the provisioning process continued. However, due to the incorrect routing and the time that it takes to process complex LSRs, the SDCs were unable to meet the defined FOC timeline.

Qwest identified an issue with incorrect routing at the end of July, and implemented a daily call starting August 6, 2001, with the Interconnect Service Centers (ISCs) to prevent this problem from recurring. During the daily call, the ISCs analyze all the routing situations and use that data to train ISC personnel on the proper routing of the requests. Proper routing is required because complex orders require specialized handling. Re-routing is not allowed to occur until a coach has been contacted to validate that the routing is appropriate and accurate.

KPMG Comments (11/28/2001):

KPMG Consulting has reviewed Qwest's 10/16 response, where Qwest mentioned that it had implemented a daily call starting August 6, 2001, with the Interconnect Service Centers (ISCs) to prevent Qwest from missing the FOC timeline for Resale PBX Orders.

KPMG Consulting conducted a retest regarding Resale PBX orders, and observed that Qwest returned late Firm Order Confirmations (FOCs) for these orders. KPMG Consulting has provided examples of these orders in a separate confidential document.

KPMG Consulting recommends that Exception 3061 remain open.

Qwest Response KPMG Comments (12/06/2001):

Qwest reviewed the confidential attachment and found the following:

- The first LSR was routed to the correct center and met the 48-hour FOC commitment.
- The second LSR was routed to the correct center, however Qwest still missed the 48 hour FOC commitment. While Qwest missed the benchmark for this particular LSR Qwest has consistently exceeded the benchmark for timely FOC transmittal for Aggregate Resale Products. Between the periods of August through October Qwest timely provided FOC's on 97% of submitted service requests, as defined by the PO-5B PID. Qwest submits that it is in compliance with PO-5B.
- The last LSR was a cancel supplement request, therefore a cancellation notice was sent, not a FOC as indicated in KPMG's confidential attachment. The cancellation notice was sent late because the SDC did not understand that a cancellation notice was required in addition to processing the cancellation request. When it was discovered that the cancellation notice was not sent the SDC was coached on the correct process and the cancellation notice was sent.

Detailed LSR information is provided in the confidential attachment.

KPMG Supplemental Recommendation (02/06/2002):

Based on Qwest's 12/06 reply, KPMG Consulting conducted retest activity on Resale PBX trunks and observed that Qwest is still not meeting the 90% FOCs delivered within 48 hours benchmark requirement



of the PO5B PID. During this retest 13 PBX trunk orders were submitted. Of these 13 orders only 11 returned FOCs within the 48-hour commitment. This equate to an 85% FOCs on time performance. KPMG Consulting has provided the details of these orders in a separate confidential document.

KPMG Consulting recommends that Exception 3061 remain open pending Qwest review.

Qwest Response to KPMG Supplemental Recommendation (02/13/2002):

Qwest has reviewed the information provided by KPMG. While the average interval for providing responses for the 13 LSRs was less than 38 hours, Qwest does not dispute that two LSRs were processed in greater than the 48-hour standard for PBX orders.

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 does not believe it is appropriate to further subdivide the measure.

However, Qwest did review the results specific to the Pseudo-CLEC. Qwest met PO-5B-1a in every month since July. 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 this demonstrates consistent performance on these measures.

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 believes the aggregate CLEC results also indicate satisfactory and consistent performance on these measures.

KPMG 2nd Supplemental Recommendation (02/20/2002):

KPMG Consulting reviewed Qwest's February 13, 2002, response and acknowledges that the PO-5B PID includes both Resale services & UNE-P POTS disaggregated by interface type. However, KPMG Consulting does not agree with Qwest's assertion that further subdivision of the measure is inappropriate. Based on the PID definitions for the PO5B PID the only way to properly measure Qwest's performance on this PID is to further disaggregate the measure for resale services by the product that is being ordered. This further subdivision is necessary because the benchmark for resold POTS service is 24 hours whereas the benchmark for resold PBX services is 48 hours. Without taking a product specific view of the results there is no way that KPMG Consulting can measure Qwest's performance on this PID.

KPMG Consulting agrees with Qwest that the P-CLEC results for the PO-5B PID are being met. However, the benchmark that is being met is for POTS services only. Qwest has failed to meet the 48-hour benchmark for PBX trunks in the initial test and in the two subsequent retests that were conducted as a result of Qwest's replies to this exception.

Based on Qwest's failure to meet the PO-5B benchmark for PBX trunks KPMG Consulting recommends that Exception 3061 remain open.

Qwest Response to KPMG 2nd Supplemental Recommendation (03/05/2002):

Qwest has reviewed the information provided by KPMG. During this retest only 13 PBX trunk orders were submitted. Of these 13 orders, 11 returned FOCs within the 48-hour commitment. This equates to an 85% FOCs on time performance, compared to the 90% Benchmark.



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. Qwest does not believe it is appropriate to further subdivide the measure beyond the definition in the PID.

KPMG asserts that “further subdivision is necessary because the benchmark for resold POTS service is 24 hours whereas the benchmark for resold PBX services is 48 hours. Without taking a product specific view of the results there is no way that KPMG Consulting can measure Qwest’s performance on this PID.”

Qwest disagrees with this position. The PID is a percentage of FOCs returned on time not a calculation of the average interval. Therefore, each LSR is compared with the appropriate interval and either meets that interval or misses that interval and subdivision by product is not required to measure Qwest's performance on PO-5B.

In commercial results, reported 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 by less than 1%. The aggregate CLEC results indicate satisfactory and consistent performance on these measures.

Qwest also reviewed the results specific to the Pseudo-CLEC. Qwest met PO-5B-1a in every month since July. 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 these P-CLEC Test results demonstrate 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 our ability to provide timely FOCs and requests KPMG close this exception as “Closed/Unresolved”.

Attachment(s): None