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**Exception 3010**  
Qwest OSS Evaluation

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Date: December 6, 2001

**EXCEPTION REPORT**

**An exception has been identified as a result of the test activities associated with MTP Test 14, Provisioning.**

**Exception:**

Qwest did not populate Dark Fiber installation test results in Work Force Administration (WFA) logs as mandated by the Unbundled Dark Fiber Customer Communication Technician- Implementer (CCT-I ) Job Aid (Unbundled Dark Fiber Methods and Procedures, Designed Services DS 98-0001-H).

**Background:**

KPMG Consulting performed a review of Qwest's Unbundled Dark Fiber installations as required in Appendix K of the MTP (Test 14). The Dark Fiber Method and Procedure document<sup>1</sup> instructs the CCT-I to populate the WFA logs with the core test results (continuity testing, light loss and interoffice fiber parameters) for each Dark Fiber installation. The CCT-I is responsible for recording these test results as benchmarks on the OSSCN. The CCT-I is also responsible for providing his own contact information, and the contact information for the central office technician, as well as the date and time by which the installation was completed.

**Issue:**

KPMG Consulting examined the WFA logs provided by Qwest and found:

- Data in the WFA logs was incomplete.
- WFA logs were missing for 18 of the 23 orders KPMG Consulting expected to review (either the order contained no screen, WFA log was incomplete, or contained no results).
- Of the 5 WFA logs Qwest provided to KPMG Consulting, none included the results as stated in the UDF Methods and Procedures.

Table 1 provides the summary of the Dark Fiber June Report Summary.

Table 1: Dark Fiber June Report Summary

Test Instanc	State	Order Number	Status	Comments
1	CO	Unavailable	Completed	Did not receive OSSCN WFA log.

<sup>1</sup> Designed Services DS 98-0001-H Unbundled Dark Fiber (UDF) Methods and Procedures CCT -I Job Aid, pg. 5 Provisioning Step 4.

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Test Instanc	State	Order Number	Status	Comments
2	CO	COC321490001	Completed	Received OSSCN WFA logs, however Incomplete, or Not Satisfied.
3	CO	COC321475001	Completed	Not Closed out in WFA/C.
4	CO	COC321504001	Completed	No OSSCN WFA log.
5	CO	COC318983001	Completed	Order not found.
6	CO	COC321462001	Completed	Order not found.
7	CO	COC321506001	Completed	No OSSCN WFA log.
8	CO	COC321345001	Completed	Order not found.
9	CO	COC321426001	Completed	Received OSSCN WFA logs, however, Incomplete or Not Satisfied.
10	CO	COC321437001	Completed	Received OSSCN WFA logs, however, Incomplete or Not Satisfied.
11	CO	COC321504001	Completed	No OSSCN WFA log.
12	CO	COC321641001	Completed	No OSSCN WFA log.
13	OR	SOC074369001	Completed	No OSSCN WFA log.
14	OR	SOC074374001	Completed	Order not found.
15	MN	MNC174121001	Completed	Order not found.
16	MN	MNC174122001	Completed	Order not found.
17	MN	MNC176849001	Completed	Order not found.
18	MN	MNC174125001	Completed	Order not found.
19	MN	MNC174139001	Completed	Order not found.
20	MN	MNC174140001	Completed	Order not found.
21	MN	MNC174151001	Completed	Received OSSCN WFA logs, however, Incomplete or Not Satisfied.
22	MN	MNC174152001	Completed	Received OSSCN WFA logs, however, Incomplete or Not Satisfied.
23	WA	SOC077764001	In progress	Not Closed out in WFA/C.

**Impact:**

Failure to adhere to Unbundled Dark Fiber Method and Procedures could result in unnecessary delays to provision the fiber to the CLEC. The delays could result from either of the following: (i) unnecessary and/or redundant testing on the fiber (ii) inability to conduct educated troubleshooting should problems arise with the fiber in the future, (iii) provisioning inferior fiber to the CLEC that couldn't support the intended service offering. These delays could increase a CLEC's operating costs as a result of the added time required to ensure proper provisioning of the fiber, and could decrease its customers' satisfaction because of the possible delays.

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#### *Qwest Response Summary:*

The information supplied by KPMG included Circuit Level Order (CLO) numbers, which represent identification numbers for Circuits. The CLO numbers are not individual job numbers. The original Data Request, R-151, through which the information was supplied to KPMG was not complete. 18 of the 23 requested CLO numbers with Order Not Found status were archived, and have been requested by Qwest for a supplemental Data Request. Additional information will be provided by July 20, 2001, in the Data Request supplemental Response #R-151-S.

Test Instance 1 did not have a CLO number. The Job ID number is unknown at this time.

Test Instance 2 and 9 are for job number B12D047

Test Instance 3 is for B12D108

Test Instance 4 and 11 are duplicate CLO numbers B12D097

Test Instance 5 is for job number B12D144

Test Instance 7 is for B12D117

Test Instance 10 is for B12D048

Test Instance 12 is for B12D116

Test Instance 13 not known at this time

Test Instance 14 is for B1RD015

Test Instance 15 is for B1MD006

Test Instance 16 is for B1MD007

Test Instance 17 is for B1MD008

Test Instance 18 is for B1MD009

Test Instance 19 and 20 are for B1MD011

Test Instance 21 and 22 are for B1MD012

Test Instance 23 is not known at this time

Test Instance 6 and 8 were not found to be Dark Fiber jobs. One was another type of job, and one did not exist at all. We believe the proper CLO numbers may be COC32162001 and COC32165001

According to the Wholesale Interconnection Operations Tab 21, Unbundled Dark Fiber- Interoffice (IOF) and Loop 02/21/01 documentation, Test and turn-up only includes continuity testing. The process mentioned by KPMG is correct. The WFA OSSCN log should have information that light was passed, and at what dB (Decible) loss. The beginning and ending locations are also listed on the log.

KPMG provided 5 OSSCN logs for Qwest to investigate the lack of test documentation.

Job number C12D048, CLO number COC321437001, did not document any appropriate test information.

As indicated on the log, the Tester was no longer available to provide information on this incident. Qwest records indicate that the test did occur, and the fiber tested OK. However, both the Technician and the Test Implementer closed out the job without documenting the necessary information in the log. Qwest research determines that in this incident, the appropriate process was not followed by the Test Implementer.

The other four logs provided had the proper information in the notes section of the OSSCN log. The four logs are for two job numbers: B12D047 and B1MD012. Both of the log screens available for B12D047 (CLO numbers COC321490001 and COC321426001) indicate that light passed unimpeded through the fibers. The dB (Decible) loss along the line was -13dB. Transmit and receive were both -3 dB. The line was tested from DNVERCODC to ENDOVV.

The information available for CLO numbers MNC174151001 and MNC174152001, job number B1MD012, also indicates that the continuity test completed at -9.6 dB and -12 dB transmit and receive. The location was MPLSMN07 to NWBTMNCL.

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The other information referenced by KPMG, specifically the names and phone numbers of the Technicians, have been redacted from the logs. Date and time are available throughout the WFA logs. Only the OSSCN log was requested in the Data Request, however other WFA screens may contain information helpful to KPMG's inquiry.

Qwest has determined that one of the five examples provided by KPMG lacked proper documentation that should have been entered by the tester. The supplemental Data Request will provide WFA logs for the remaining CLO numbers which were not provided in the original request.

#### ***KPMG Comments (08/10/2001):***

On July 23, 2001, Qwest provided KPMG Consulting with a supplemental response to data request R-151. KPMG Consulting reviewed all documents received from Qwest:

- *KPMG R151S1 Confidential C.pdf,*
- *KPMG JUNE R151S1 Con Att B.doc,*
- *KPMG JUNE R151S1 Con ATT D.doc.*

The table that follows on pages 5 and 6 details KPMG Consulting's analysis of the Qwest supplemental data, and Qwest's adherence to the required provisioning tasks for Unbundled Dark Fiber installations as documented in *Designed Services DS 98-0001-H – Unbundled Dark Fiber (UDF) Methods and Procedures – CCT-I Job Aid*. On page 5 of this document, listed under "Step 4" of the "Provisioning" table, are listed the following tasks that are to be completed by the CCT-I (note: KPMG Consulting has summarized the information listed on page 5 into the following bullet points):

- Post the Due Date complete in WFA-C.
- Make sure to note the OSSCN with the same information given to the "Project Lead". The note also indicates, "The CCT-I is responsible for recording test results as benchmarks on the OSSCN, and sending an email message to the Project Lead via the mailbox".

The CCT-I is responsible for providing the following to the Project Lead:

- CCT-I's name and telephone number.
- The appropriate test results.
- COTs name and telephone number, date and time completed.

Our analysis of the supplemental Qwest data reveals that this information still does not meet the requirements listed in the Job Aid. Failure to adhere to Unbundled Dark Fiber

Method and Procedures could result in unnecessary delays to provision the fiber to the CLEC. The delays could result in any of the following:

- (i) Unnecessary and/or redundant testing on the fiber.
- (ii) Inability to conduct educated troubleshooting should problems arise with the fiber in the future,
- (iii) Provisioning inferior fiber to the CLEC that couldn't support the intended service offering. These delays could increase a CLEC's operating costs as a result of the added time required to ensure proper provisioning of the fiber, and could decrease its customers' satisfaction because of the possible delays.

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Further, the required tests and corresponding results were designed to “establish a benchmark value for future reference.” These records should remain available until the service is disconnected. The additional data provided by Qwest does not resolve this exception.

Key:

S—Satisfied. Qwest documentation has satisfied the required fields and the required fields were populated in OSSCN.

NS—Not Satisfied. The additional Qwest documentation is not populated with the required fields in OSSCN.

NO—Not Observed. KPMG did not observe the order in OSSCN.

NA—Not Applicable. The populated fields are not applicable to this order in OSSCN.

**Table 2—Summary of KPMG Consulting’s Analysis of Qwest’s Supplemental Data**

Ord Num	CCIT NM/NUM	1310nm LOSS A/Z	1310nm LOSS Z/A	1550nm LOSS A/Z	1550nm LOSS Z/A	COT/A NM/NUM	COT/Z NM/NUM	DT/TM COMP	Comments
Jnavailable									
OC321490001	S	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC321475001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC321504001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC318983001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC321462001	NA	NA	NA	NA	NA	NA	NA	NA	Required entries were absent in OSSCN
OC321506001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC321345001	NO	NO	NO	NO	NO	NO	NO	NO	OSSCN not provided as requested "COC32 Could not be found in TIRKS, WFA or Ev This may be a reservation order in TIRKS have been cancelled"
OC321426001	S	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC321437001	S	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC321504001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC321641001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC074369001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC074374001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
NC174121001	S	NS	NS	NS	NS	S	S	NS	Required entries were absent in OSSCN
NC174122001	S	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
NC176849001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
NC174125001	S	NS	NS	NS	NS	S	S	NS	Required entries were absent in OSSCN
NC174139001	S	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
NC174140001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
NC174151001	S	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
NC174152001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN
OC077764001	NS	NS	NS	NS	NS	NS	NS	NS	Required entries were absent in OSSCN

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***Qwest Response to KPMG Comments (08/17/2001):***

Upon investigation of the instances in the matrix sent by KPMG under separate cover, Qwest has determined that the specific tests KPMG is expecting to be added into the OSSCN screen are contract specific, and not uniform for all CLECs. This information was not clear in the documentation provided to KPMG, and that documentation will be amended. In addition, Qwest determined that the CLEC contact name and number was also an appropriate addition to the OSSCN screen, and the process will be updated to include that field as well. The test specific internal document will be available on August 24, 2001, with all applicable updates concluded by August 31, 2001. The documentation will be provided to KPMG through the Data Request process.

***Qwest Supplemental Response to KPMG Comments (08/22/2001):***

Qwest would like to advise KPMG that all document updates and changes will be provided on August 24, 2001 through the Data Request process.

***Qwest 2<sup>nd</sup> Supplemental Response to KPMG Comments (08/24/2001):***

Qwest is providing the updated unbundled dark fiber process through the DR process. This documentation clarifies that continuity testing is the fundamental test, but other tests may be included in specific CLEC contracts. Only those CLECs with the specific test parameters would have those tests updated on the OSSCN screen. In addition, Qwest has added the requirement of the Customer Contact name and number as well as the specific tests. No further documentation updates will be provided on 8/31/01.

The document provided in the Data Request is:

*Designed Services DS 98-0001-H Unbundled Dark Fiber (UDF) Methods and Procedures CCT-I Job Aid*

***KPMG Supplemental Recommendation (09/04/2001):***

KPMG Consulting reviewed the document, *Designed Services DS 98-0001-H Unbundled Dark Fiber (UDF) Methods and Procedures CCT-I Job Aid*, referenced by Qwest on August 24, 2001 in its second supplemental response to Exception 3010. KPMG Consulting's assessment consisted of a comparison between the current and previous version of this document, and a content review of the latest document. KPMG Consulting has concerns regarding the contents of this document and has identified the following issues and differences (between the current and past version of this document):

- 1) KPMG Consulting notes that whereas Qwest previously used the term, "Co-provider", it has now replaced all occurrences of it with the word, "CLEC". (*difference*)
- 2) On page 1 of the document under the, "Product Description" section, the sentence, "UDF will be available to CLEC's as a pair(s) of unlit interoffice optical fibers (i.e., one fiber or two fibers) on

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*which no terminating electronic equipment is provided by Qwest...*, there is an inconsistency in the usage of the terms "...pair(s) of unlit..." and "...one fiber or two fibers...". A pair of unlit optical fibers should consist of two fiber strands, not one fiber. (*difference*)

- 3) On page 2 of the document under the, "Terms and Conditions" section, the ninth bullet, "*CLEC's will provide*" is an incomplete statement. (*issue*)
- 4) KPMG Consulting notes that on page 3 of the document under the, "Major Assumptions" section, the first bullet item, "*One or two fiber(s) will be required for a fiber optic system. Fiber(s) for transmit and receive working system.*" is new to this version of the document. Furthermore, this point requires further clarification since it does not clearly convey its intent. (*issue*)
- 5) KPMG Consulting notes that on page 3 of the document under the, "Major Assumptions" section, the fourth bullet item, "*Continuity testing will be completed jointly with the CLEC providing the light source on the Dark Fiber. The Tester will build a handoff and send it to the CORAC to inform them of the coordinated testing that needs to be performed. (ALL LIGHT SOURCES NECESSARY WILL BE PROVIDED BY THE CO-PROVIDER)*" is new to this document version. Previously, there was no indication that the CLEC was required to provide the light source in a continuity test. (*difference*)
- 6) On page 3 of the document under the, "Fiber Parameters and Losses" section, no parameters are provided. In the previous version of the document, these parameters were included. (*issue*)
- 7) KPMG Consulting notes that on page 7 of the document under the, "Testing Requirements – Unbundled Dark Fiber Test Parameters and Limits" section, the table has changed. Specifically, no parameters or limits are stated even though the section title would indicate such information would be present. Moreover, in the table under the "Limit" column, Qwest references, "*See Central Office Process.*" But KPMG Consulting was unable to find any documentation to support the "Central Office Process". (*issue*)
- 8) Finally, the document has been published as a DRAFT version dated August 3, 2001. A draft version document is not considered an officially released, operational, and functional document. Consequently, KPMG Consulting cannot consider this document to be part of Qwest's real world operational policy for the provisioning of dark fiber. Without supporting information to indicate new policies are in effect, KPMG Consulting presumes that Qwest personnel are still adhering to dark fiber provisioning processes and procedures prior to the publication of this document. (*issue*)

Because of the issues described above, Exception 3010 remains open.

***Qwest Response to KPMG Supplemental Recommendation (09/07/2001):***

Item Numbers 2, 3, and 7 all contain wording about changes that "will be" made to process documentation. All process and document changes noted in the supplemental response dated 09/06/01 have been made and provided as a Data Request associated with this Exception. There are no further document updates or changes to be provided to KPMG at this time.

***Attachment(s):*** None

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***KPMG Response (December 6, 2001):***

KPMG has received and reviewed the documents provided by Qwest and has not identified any additional issues at this time.

KPMG Consulting will continue to collect schedules from Qwest and will validate Dark Fiber as they complete. As agreed with the ROC TAG, observations of Dark Fiber orders will continue until a sample of 35 orders has been successfully tested or until all other testing ends.

**KPMG Consulting recommends that Exception 3010 remain open pending successful retest results.**