

# EXCEPTION 3120—DISPOSITION REPORT

Qwest OSS Evaluation

---

Initial Release Date: April 3, 2002

First Response Date: April 6, 2002

Disposition Report Release Date: May 23, 2002

## EXCEPTION DISPOSITION REPORT

### Exception:

**Based on the PID performance analysis associated with Test 12 and Test 14 of the MTP, KPMG Consulting has identified several data integrity issues involving Qwest's calculation of the PID results.**

### Summary of Exception:

While analyzing the P-CLEC PID performance data and calculating the PID results for the P-CLEC, KPMG Consulting identified several data integrity issues with Qwest's PID data. In addition to the discrepancies originally identified in Observations 3089 and 3099 (see Exception 3120 details for the history of these two observations), KPMG Consulting identified two additional problems that had to be addressed by Qwest. The first of these problems involved improper exclusions from the calculation of the OP-4 results. The other issue involved the incorrect application of weekends in the OP-4 calculation for both the wholesale and retail results. As a result of these data problems, Qwest was required to conduct two recasts of its recent results to correct for these problems.

### *Summary of Qwest's First Response:*

Qwest provided KPMG a recast OP-4 data set for January and February, 2002 on April 1, 2002. For a detailed explanation of why the data was recast please see Qwest's April 2, 2002 response to Exception 3086.

### **Summary of KPMG Consulting's First Response:**

KPMG Consulting acknowledges and agrees with Qwest's reply comments indicating that the detailed explanation of why the wholesale and retail data needed to be recast was documented in Qwest's reply to Exception 3086.

KPMG Consulting performed an analysis of the recast February data. While performing this analysis we found issues in several areas. While some of the issues are clearly with Qwest's data, others may be a result of our misunderstanding of Qwest's documentation or the improper application of business rules.

The issues fall into three general areas. The first issues concerns exclusions, the second concerns dates and intervals, and the third concerns missing data.

# EXCEPTION 3120—DISPOSITION REPORT

## Qwest OSS Evaluation

---

With respect to exclusions, of the 575 retest orders that KPMG Consulting compared to Qwest's data, Qwest had 283 marked as having an interval longer than the standard, as compared to just one for KPMG Consulting. Also, Qwest used the data exception field of '1' for 574 orders and '69' for one order. Qwest has provided KPMG Consulting with an advanced copy of new RSOR documentation that describes this coding of data exceptions. Qwest has indicated that this updated documentation will be generally available to all CLECs by the end of April. According to the new documentation a code of '1' that formally indicated the order should be excluded for no inward activity now indicates the order was a test order (all orders analyzed were test orders). A code of '69' is the new code used to indicate that the order had no inward activity. KPMG Consulting does not believe there were any orders with no inward activity.

With respect to date and interval issues, of the 745 orders used in the comparison, KPMG Consulting's data failed to match Qwest's data on the application date in 345 instances. Additionally, the completion date did not match in 2 instances, and the applicable due date did not match in 4 instances. KPMG Consulting also found 63 cases (out of 745) where the KPMG calculation for the OP-4 interval did not match the Qwest calculation for the OP-4 interval.

KPMG Consulting believes that the primary issue with respect to application dates has to do with whether (and in what circumstances) weekends, particularly Sundays, and holidays are included as application dates. Qwest's documentation with respect to application date is not clear.

Finally, KPMG Consulting's database did not contain 31 of Qwest's records and Qwest's database did not contain 116 of KPMG Consulting's records.

### *Summary of Qwest's Second Response:*

Qwest has reviewed the confidential document provided by KPMG and provides the following information divided into the three KPMG areas: exclusions, dates and intervals, and missing data. Qwest is providing a confidential document that includes a cross-reference to each item identified in the KPMG confidential document.

KPMG issues are included in Italics below.

#### Exclusions:

1. *KPMG issue:* Qwest had 283 marked as having an interval longer than the standard, as compared to just one for KPMG Consulting.

Qwest found 284 items in the KPMG confidential document with an interval longer than standard. Qwest analysis on these 284 items is as follows:

Qwest found a coding error in 281 standard interval orders that should have been included in the OP-4 results, but were not, because the Regulatory Reporting code was inappropriately counting Saturday or Sunday. This resulted in an extra day being added to the interval offered data field compared against the standard interval for that product.

# EXCEPTION 3120—DISPOSITION REPORT

## Qwest OSS Evaluation

---

Once the additional day was removed, the interval offered was equal to standard and no longer excluded. The Regulatory Reporting code was updated on April 5, 2002. Liberty will audit this coding change as part of their OP-4 measurement review.

On 2 items: 1 request had a standard interval of two days and the customer requested a four-day interval. 1 request had a standard interval of three days and the customer requested a four-day interval.

On the 1 remaining item, Qwest agrees with KPMG that this item was correctly marked as having an interval longer than the standard.

A cross-reference is provided in the “Qwest Confidential Attachment 1, E3120” on these 284 items, section “Exclusion Issues”.

2. KPMG issue: Qwest use of exception field “1” and “69”.

*In order to comply with new required FCC reporting requirements, Qwest reorganized and standardized the numbering scheme for data exceptions across all data sources. This resulted in no impact to Qwest official 271 results. Qwest provided KPMG with an advanced copy of the official updated chapter of the technical documentation for RSOR that documented the new data exception numbering scheme. This chapter will be included with the entire technical document, which will be available at the end of April 2002.*

### Dates and Intervals:

3. KPMG issue: KPMG Consulting’s data failed to match Qwest’s data on the application date in 345 instances.

While KPMG comments indicated 345 instances where the KPMG data failed to match Qwest’s data on the application date, Qwest’s review of the confidential document shows 380 total orders. Of the 380 orders, 59 were duplicate orders and 6 Qwest orders matched the KPMG application date. This leaves 315 orders where the KPMG data failed to match Qwest’s data on the application date and from which Qwest provides details below. The 59 duplicate items have been moved to a new tab “Date and Interval Dups” in the Qwest Confidential document (Attachment 1).

*Qwest provides the following information on the 315 application date items that did not match.*

*266 items are related to orders submitted on Saturday and Sunday that have an effective application date of Monday. In these cases, Qwest RSOR data reflects the actual date submitted by the CLEC (Saturday or Sunday). KPMG is using the effective application date, which is the next business day. This is why the date does not match. In the OP-4 calculation, Qwest uses the effective application date; the effective application date is not always the same date as the date submitted by the CLEC. For instance, an order submitted on Sunday will have an effective application date of Monday or an effective application date of Tuesday if Monday is a holiday. This resulted in Qwest having the same interval as KPMG calculated on the OP-4 interval.*

## EXCEPTION 3120—DISPOSITION REPORT

### Qwest OSS Evaluation

---

*For 33 items, KPMG did not use the correct Application Date:*

*28 items are related to Non-Dispatch Res. POTS orders submitted on Saturday that have an effective application date of Saturday. As Qwest has discussed in Observation 2080, for those orders received on Saturday, this type of order activity uses Saturday as the effective application date. KPMG incorrectly moved the application date on these orders to Monday.*

*3 items fell into the 7PM MT cut-off time for application date. KPMG possibly calculated using 3PM MT cut-off.*

*2 items involved supplemental versions of the LSR. Qwest appropriately applied the application date based on the date and time when the first LSR was received. KPMG appears to have based their application date on their second submission of their version 2 LSR.*

*11 items are related to orders submitted after business hours. This issue has been addressed in previous Qwest responses to Observations/Exceptions.*

*5 items are related to errors made by Qwest typists. Qwest will conduct a review of the proper handling of these service requests with the typists by April 12, 2002.*

*A cross-reference is provided in the “Qwest Confidential Attachment 1, E3120” on these 315 items, section “Dates and Interval Issues”. 4. KPMG issue: Additionally, the completion date did not match in 2 instances.*

*Qwest found a typist error in the completion dates on these two items. Qwest will conduct a review of the proper handling of these service requests with the typists by April 12, 2002.*

*A cross-reference is provided in “Qwest Confidential Attachment 1, E3120” on these 2 items, section “Dates and Interval Issues”.*

*5. KPMG issue: The applicable due date did not match in 4 instances.*

*Qwest believes the applicable due date logic is correct for these 4 items. It appears that the discrepancies noted by KPMG are attributable to differences in how Qwest and KPMG accounted for delays as customer-caused versus Qwest-caused.*

*For 2 of these orders items KPMG provided the correct applicable due date in their confidential attachment. The applicable due date in the Qwest RSOR data differed because of a human input error when coding delayed causes on the service order. Again, the applicable due date logic operated correctly but, the applicable due date generated was incorrect because the inputs were incorrect. Qwest will conduct a review of the proper handling of these service requests with the typists by April 12, 2002.*

*For the remaining 2 orders, Qwest believes we provided the correct applicable due date in the RSOR data. The details regarding these 2 orders are detailed in the “Qwest Confidential Attachment 2, Exception 3120”.*

*A cross-reference is provided in “Qwest Confidential Attachment 1, E3120” on these 4 items, section “Dates and Interval Issues”.*

## EXCEPTION 3120—DISPOSITION REPORT

### Qwest OSS Evaluation

---

6. KPMG issue: KPMG Consulting also found 63 cases (out of 745) where the KPMG calculation for the OP-4 interval did not match the Qwest calculation for the OP-4 interval.

*Qwest's review of the confidential document actually showed a total of 91 non-duplicate orders where the OP-4 interval did not match. Qwest provides the following information on the 91 items that did not match:*

For 37 items, it appears that KPMG did not calculate the OP-4 interval correctly as identified below:

28 items related to KPMG not including Saturday as a Business Day in their OP-4 interval calculation for OP-4 Non-Dispatched Residence POTS. (see KPMG issue # 3 above)

3 items related to apparent KPMG errors in their OP-4 interval logic. Two of these were identified by KPMG as issues involving the applicable due date (See KPMG issue # 5 above). A review of these items is provided in the "Qwest Confidential Attachment 2, Exception 3120."

5 items relate to apparent KPMG application date errors. (see KPMG issue #3 above)

1 item relates to an order that completed on Saturday but KPMG apparently did not count Saturday in their interval calculation.

For 54 items, Qwest did not calculate the OP-4 correctly as identified below:

35 items had a Regulatory Reporting code error related only to Sunday Application dates. The Regulatory Reporting code was updated on April 5, 2002. Liberty will audit this coding change as part of their OP-4 measurement review.

2 items related to Qwest having a different completion date due to Qwest typist error. (See KPMG issue # 4 above).

11 items are related to orders submitted after business hours. (See KPMG issue # 3 above)

5 items related to Qwest application date typist errors. (See KPMG issue # 3 above).

1 item relates to an order with a human input error when coding delayed causes on the service order. (See KPMG issue #5 above).

A cross-reference is provided in the "Qwest Confidential Attachment 1, E3120" on these 91 items, section "Dates and Interval Issues."

#### Missing Data:

7. KPMG issue: KPMG Consulting's database did not contain 31 of Qwest's records. All 31 records were properly included in the ad-hoc data sent to KPMG. It should be noted that 28 of the 31 record were excluded (d-expected) from the OP-4 calculated results. The ad-hoc data provided by Qwest includes orders generated by the CLEC and test orders generated by Qwest. The remaining 3 records should be in KPMG's data.

28 Records were orders generated by Qwest:

Twenty-three (23) orders were related to the reset of the 5.1 DUF test bed.

Three (3) orders were part of a TI response relating to the sending of a DLR.

## EXCEPTION 3120—DISPOSITION REPORT

### Qwest OSS Evaluation

---

Two (2) orders shown in the data were issued to correct the bill mail address on 2 accounts converting to Resale. The same PON's were used on the orders to correct the bill name as were used on the conversion orders and are listed below. The orders were due the day after the conversion order completed.

3 Records pertain to orders generated by the P-CLEC, as follows:

1 New Resale Business service request (This LSR required manual handling, and the order number communicated on the FOC was incorrect. This is why KPMG has no record of this order. Qwest will conduct a review of the proper handling of service requests with the typist by April 12, 2002.)

1 New Resale Residential service request (Qwest will provide a screen shot of this LSR in Qwest Confidential Attachment 3, E3120)

1 New Unbundled Loop (submitted via IIS) (Qwest will provide a screen shot of this LSR in Qwest Confidential Attachment 3, E3120)

*A cross-reference is provided in the "Qwest Confidential Attachment 1, E3120" on the 31 items, section "Not Found Records".*

8. KPMG issue: Qwest's database did not contain 116 of KPMG Consulting's records. The following is the result of the analysis of the 116 orders that do not reflect a wholesale MCN in the data:

Conversion to Resale - 108 orders. Qwest found a RSOR error that was incorrectly capturing the outward MCN instead of the inward MCN. For these orders, the outward MCN was a Retail MCN, therefore classified as Retail by Qwest and not included in the previous pseudo CLEC data set sent to KPMG. Qwest has corrected this problem and now properly references the inward MCN on all effected orders. The 108 orders are now included in the revised confidential attachment and revised pseudo CLEC ad-hoc data set sent to KPMG. Qwest will incorporate this change in March02 results with a rerun back to Jan02.

Removal of Line Sharing - 6 orders. Line Sharing is unique in that the orders are written on a retail account. Qwest has developed specific steps in order to capture the wholesale activity on these retail accounts. Qwest implemented these steps to capture inward line activity only since that is the defined scope for OP measures.

Retail - 1 order. The LSR that generated this order was treated as a partial conversion. The line converting was the retail billing account number. This specific order number was establishing a new retail billing account number for the retail line remaining.

Therefore, this retail activity would not be found in the wholesale data. The wholesale activity is found in the wholesale data under the related order number.

No PON/TN Match - 1 order. Qwest was unable to match TN/PON to order. As a result, research could not be completed on this item.

*A cross-reference is provided in the "Qwest Confidential Attachment 1, E3120" on the 116 items, section "Not Found Records."*

# EXCEPTION 3120—DISPOSITION REPORT

## Qwest OSS Evaluation

---

### **KPMG Consulting's Retest Results:**

KPMG Consulting conducted a retest of the items that Qwest identified as problems in their second reply comments. This retest specifically addressed the following:

- The Western Region MCN issue
- The calculation of the proper "application date" based on orders that were received on the weekend.
- The calculation of the proper "application date" based on the various time-of-day cutoffs.
- The proper calculation of the OP-4 interval based on orders that spanned a weekend.
- The proper calculation of the OP-4 interval for orders that had Saturday due dates.
- OP-4 exclusions based on orders with intervals >than the standard interval.
- The proper calculation of OP-4 for orders that had customer initiated due date changes.

The transactions for this retest were submitted between Friday 4/19 through Wednesday, 4/24. All of the times and dates the orders were submitted and the desired due dates requested on each order were closely coordinated between KPMG Consulting and HPC to insure we would get the test results we were looking for from these transactions.

KPMG Consulting developed its view of the PID results from this retest and compared them to the Qwest calculation of the P-CLEC results. This resulted in problems found on 5 of the 92 retest orders issued. The problems all involved differences in application dates and in calculated intervals.

On May 22, 2002, KPMG Consulting, MTG and Qwest had a focused O&E call to address these differences. The results of this call are as follows:

- For three of the orders KPMG Consulting and Qwest differed on the application date and therefore also differed on the OP-4 interval by one business day. The reason for this difference was that all of these orders, which were issued before 7:00 PM on a Saturday, did not flow through Qwest's systems. Based on Qwest's documented business rules any order received on a Saturday that drops out to manual handling will receive a Monday application date. KPMG Consulting was working under the assumption that because all three of these orders were flow through eligible that they would have had a Saturday application date. Based on this discussion KPMG Consulting is satisfied that Qwest properly calculated the application dates and OP-4 intervals on these three orders. However, Observation 3109 has been filed by KPMG Consulting to address the issue of why six Western Region flow through eligible orders (the three mentioned here plus 3 others associated with this retest) all fell out for manual handling.

## EXCEPTION 3120—DISPOSITION REPORT

### Qwest OSS Evaluation

---

- One of the orders also had a difference of one day between the application date and interval reported by Qwest versus what KPMG Consulting expected on the order. In this instance the order was issued on a Saturday with a Tuesday due date (the standard interval for this order was 2 days). The order flowed through on Saturday, yet the application date on the order is Monday. Qwest asserted that a Qwest Service Representative mistakenly changed the application date on the order to Monday's date. Though this order didn't miss the Tuesday due date thereby, having no impact to the OP-3 results, the change in the application date from Saturday to Monday incorrectly gave Qwest the benefit of one day less in its calculation of the OP-4 results. Qwest indicated during the call that they didn't know why one of its representatives would have changed the application date on an order that didn't appear to require any manual intervention. They were still investigating this issue.
- The final order was also issued on a Saturday with a Saturday due date (the standard interval for this order was zero days). This order did not flow through (this will be included in O 3109) and fell out to manual handling for processing on Monday. There were two problems with the order, both of which Qwest attributes to errors by the Qwest Service Representative. First, the order contained an incorrect application date of 4/25 (Thursday). Secondly, the order contained a "miss code" that incorrectly indicated that it was the CLEC who was the cause of the delay rather than Qwest. These errors resulted in Qwest's systems improperly calculating the OP-4 interval for this order as zero days when the interval should have in fact been 3 days. KPMG Consulting is opening Observation 3110 to address the apparent human error problems that have been experienced on this retest.

**As a result of the system problems identified by this exception satisfactorily passing the retest KPMG Consulting recommends closing Exception 3120 as Closed/Resolved. KPMG Consulting has opened Observation 3109 to address the flow through issues and Observation 3110 to address the human errors experienced during this retest.**