Test Vendor ID:	EXP 3120
***Qwest Internal Tracking ID*:**	TI 906
Observation/Exception Title:	PID Performance Analysis
***Test Type/Domain*:**	Test 14 - POP Provisioning
***Date Qwest Received*:**	04/03/2002
***Initial Response Date*:**	04/05/2002
Supplemental Response Date:	04/11/2002

Test Incident Summary:

Exception 3120 was initially released as Observation 3089 and Observation 3099. KPMG Consulting recommended on April 3, 2002 that Observation 3089 and Observation 3099 be closed and moved to Exception 3120. The historical detail of these two observations is presented below for reference.

EXCEPTION REPORT

An exception has been identified as a result of the data evaluation in Test 12 and Test 14 in the MTP.

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.

Background:

In accordance with the Qwest OSS Evaluation Project Master Test Plan, KPMG Consulting must "Compare KPMG Consulting-produced HP measures to Qwest-produced HP measures to ensure there is no problem with the data being collected for test reporting purposes."[1]

Issue:

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 below for the detailed 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.

Impact:

Without accurate reporting of PID results, regulatory commissions and CLECs have no way of knowing if Qwest is providing an environment in which CLECs are able to compete. Additionally, assuming eventual

[1] The Regional Oversight Committee (ROC) Third Party Test, Qwest OSS Evaluation Project Master Test Plan, Final Release; Version 4; p. 51.

271 relief is granted to Qwest, accurate PID data will be required by the regulators to insure that there is no backsliding by Qwest once it is allowed to reenter the in-region long distance market.

Initial Release Date (as O3089): February 11, 2002
First Response Date (as O3089): March 4, 2002
Second Response Date (as O3089): April 2, 2002

OBSERVATION REPORT

An observation has been identified as a result of the data evaluation in Test 12 and Test 14 in the MTP.

Observation:

In Test 12 and Test 14 of the MTP, KPMG Consulting is required to compare the P-CLEC data KPMG Consulting produces to the P-CLEC data Qwest produces. KPMG Consulting has found several differences between the two datasets.

Background:

In accordance with the Qwest OSS Evaluation Project Master Test Plan, KPMG Consulting must "Compare KPMG Consulting-produced HP measures to Qwest-produced HP measures to ensure there is no problem with the data being collected for test reporting purposes."[2] In order to do this comparison, KPMG Consulting selected several data fields for the months of November and December and compared KPMG Consulting data to Qwest data.

Issue:

For some orders, it appears that KPMG Consulting's data does not match Qwest's data. These data discrepancies will result in differences when comparing KPMG Consulting's view of the P-CLEC's PID performance to Qwest's view of the P-CLECs PID performance. In particular, KPMG Consulting has found a number of instances where the original due date and/or service order completion date do not contain the same values on the KPMG produced database as they do on the Qwest produced database. These fields are critical in the calculation of OP-3, OP-4, and OP-6. These fields are also used in other PID calculations.

KPMG Consulting will supply a separate confidential attachment showing examples of the differences in these two fields.

Question:

It is unclear to KPMG Consulting why there are discrepancies in the data. Can Qwest please review the accompanying confidential material and attempt to explain the differences in the datasets?

Qwest Formal Response:

There were two basic observations, one dealing with differences in due dates and the other with completion dates. As noted in the analysis below, Qwest is using the correct data for due dates and completion dates in the calculation of P-CLEC performance results. Qwest believes the reason for the data discrepancies noted between KPMG and Qwest data is that KPMG is not using the official performance measurement data sources for capturing the due date and completion date data.

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[2] The Regional Oversight Committee (ROC) Third Party Test, Qwest OSS Evaluation Project Master Test Plan, Final Release; Version 4; p. 51.

Due Date Observations

Qwest has reviewed the Confidential Documentation provided by KPMG. From this document, it appears KPMG is comparing the column…"KPMG Original Due Date" to "Qwest Original Due Date." Further it appears the column "KPMG Original Due Date" is based on the Desired Due Date (DDD) in the original LSR. Additionally, Qwest is unclear what data source KPMG is using to populate the field "Qwest Original Due Date."

If KPMG is basing their original due date from the LSR DDD, KPMG should not expect the DDD to match the due date returned in the FOC and recorded in Qwest's reporting measures. The DDD in the LSR will often match the Due Date provided in the FOC, but may also fail to match for a variety of reasons. For instance, if the CLEC requests a desired due date that falls on a holiday, or a due date that is less than the standard interval, Qwest will return a different due date in the FOC based on Qwest's published interval guidelines.

When comparing Due Dates for measurement purposes, KPMG should be comparing the latest FOC DD related to CLEC activity with the Applicable Due Date field, "INTREVDD." The Applicable Due Date field, INTREVDD, can be found in the RSOR Ad Hoc File provided to KPMG on the monthly data request.

The FOC DD field and the "INTREVDD" field should match. In the limited instances where these two fields do not match, the mismatch is typically due to a Qwest caused delay such as a lack of available facilities. When Qwest caused delays occur, Qwest reporting mechanisms accurately capture and account for these delays by appropriately adjusting the Applicable Due Date field, "INTERVDD," in the RSOR Ad HOC data file. Data input errors by Qwest typists can also lead to mismatches between the FOC DD and the Applicable Due Date field. For example, the Confidential Document provided by KPMG includes several examples where the LSR submitted by the P-CLEC requested a DDD that was a shorter-than-standard interval. The Qwest typist incorrectly returned the shorter-than-standard DDD in the FOC DD field. The Qwest typist should have adjusted the due date to comport with the standard interval and returned the adjusted due date in the FOC. As described in Observation 3086, Qwest has enhanced its service quality control process to address and minimize these types of errors.

Completion Date Observations

KPMG also provided orders where KPMG states that the completion date shown in KPMG's data does not match the completion date reflected in Qwest's Ad Hoc data. It appears, however, that KPMG may not have been able to match this data because it was comparing the wrong data points on both sides of this equation.

First, it appears that KPMG populated the "service order completion" entries in its confidential spreadsheet (column 3 in the table below) with the date that the IMA completion notice was sent to the CLEC (column 4 in the table below).

It is not the date that the IMA completion notice is sent (column 4 in the table below), but rather, the completion date reflected on the IMA completion notice (column 5 in the table below) that represents the order completion date. It is this data point—the completion date shown on the IMA Completion Notice—that should match the completion date shown in Qwest's Ad Hoc data.

In addition, it also appears that KPMG was not using the correct data point from Qwest's Ad Hoc report to compare against. Qwest is not certain what data point KPMG used to populate the "Qwest Completion Date" (column 6 in the table below) in its confidential information. The appropriate date point is the INTACTDD field from Qwest's Ad Hoc report (column 7 in the table below). As stated in Qwest Technical Documentation, when computing OP-3, OP-4 and OP-6, Qwest uses the value in the INTACTDD field for completion dates. The INTACTDD field (column 7) and the Completion Date on the IMA Notice (column 5) match, as shown in the table below with one exception.

The table does show a single discrepancy in these two columns for PON F5600535904183, due to a data entry error on the completion notice. This data entry error did not impact the correct reporting of this order in OP-3, OP-4 and OP-6.

PON	Qwest Order Number	KPMG Completion Date	IMA Completion Notice Sent	Completion date on IMA Notice	KPMG Stated Qwest Completion Date	INTACTDD (Qwest completion date for PID calculation)
Redacted	***Redacted***	03-Jan-02	1/3/02 1:12pm	3 January 02	14-Dec-01	14-Dec-01
Redacted	***Redacted***	26-Dec-01	12/26/01 2:06pm	26-Dec-01	01-Jan-01	26-Dec-01
Redacted	***Redacted***	26-Dec-01	12/26/01 1:53pm	26-Dec-01	01-Jan-01	26-Dec-01
Redacted	***Redacted***	26-Dec-01	12/26/01 2:13pm	26-Dec-01	01-Jan-01	26-Dec-01
Redacted	***Redacted***	26-Dec-01	12/26/01 1:53pm	26-Dec-01	01-Jan-01	26-Dec-01
Redacted	***Redacted***	19-Nov-01	11/19/01 4:22pm	16-Nov-01	16-Nov-01	16-Nov-01
Redacted	***Redacted***	05-Dec-01	12/5/01 3:23pm	21-Nov-01	21-Nov-01	21-Nov-01

Attachment(s): None

KPMG Consulting's First Response (03/04/02)

Contrary to Qwest's assumption, KPMG Consulting is not using the Desired Due Date (DDD) data to populate the KPMG Original Due Date column. Instead, the original due date is extracted from the DD field in the FOC.

The data in the Qwest Original Due Date is populated from RSOR data using the field SODD, which is provided to KPMG Consulting by Qwest on a monthly basis. According to Qwest's documentation in RRS, this is the original due date.

Qwest refers to fields called "INTREVDD" and "INTERVDD". KPMG Consulting found no field called INTERVDD, and assumes this is a typo on Qwest's part. The field INTREVDD was found in the most recent version of the RRS documentation, and it is labeled as the integrated revised due date. Is SODD no longer used? If so, when did Qwest begin using INTREVDD in lieu of SODD? Additionally, has Qwest updated its documentation to reflect this change in the data sets? RRS refers to an IRD process, but KPMG Consulting has not received any documentation of this process.

Qwest describes the following issue with respect to FOC DD: "Data input errors by Qwest typists can also lead to mismatches between the FOC DD and the Applicable Due Date field. For example, the Confidential Document provided by KPMG includes several examples where the LSR submitted by the P-CLEC requested a DDD that was a shorter-than-standard interval. The Qwest typist incorrectly returned the shorter-than-standard DDD in the FOC DD field." This problem seems to be different from a simple typographical error. In this case the Qwest typist is confirming back to the P-CLEC the due date that the P-CLEC requested regardless of the fact that it may have been a date that is shorter than the standard interval. KPMG Consulting is concerned that this process is manual and is prone to these types of errors. Is there an effort to automate this process?

With respect to completions, KPMG Consulting uses the completion date reflected on the IMA completion notice to populate the completion date field. The date is extracted from the CD field in the SOC.

KPMG Consulting used the data in the SOCD field from the RSOR Ad HOC data to populate the Qwest Completion Date field. The most recent RRS documentation references an INTACTDD field as the integrated completion date. This is a change from the prior version, and is apparently part of the IDR process. Once again, KPMG Consulting has received no documentation concerning this new process, and thus we do not know how to correctly analyze the PIDs using this process. KPMG Consulting needs to know when Qwest began using the INTACTDD field instead of SOCD. Also, it appears there are still three remaining differences between KPMG Consulting and Qwest completion date data. Can Qwest help explain these?

Finally, Qwest has again indicated that the data discrepancies are sometimes caused by "data input errors by Qwest typists". KPMG Consulting will conduct a retest analysis of the January PID retest data to determine if the enhanced service quality control process sited in observation 3086 is addressing these issues. Also, KPMG Consulting requests documentation relating to the IDR process and any other updates to the PID calculation that need to be considered when analyzing January 2002 data.

KPMG Consulting recommends that this observation remain open pending the clarification of the open issues mentioned in its response and pending the results of the January data comparison.

Qwest Response to KPMG Comments (03/21/02):

There are 3 areas of inquiry in KPMG's March 4th Response. Qwest will address each area specifically below:

<u>IRD process and use of the "INTREVDD" and "INTACTDD" fields</u>
KPMG posed several questions about use of different fields in the Qwest Ad HOC dataset for calculating performance as well as IRD process documentation. As Qwest communicated on a Focused O&E call, these processes were implemented with the adoption of PID 4.0. Qwest believes these issues were resolved on the O&E call.

<u>3 remaining discrepancies on Completion Date</u>
KPMG requested Qwest help explain 3 remaining discrepancies. However, Qwest does not believe there are 3 remaining discrepancies. Based on the clarification provided on the Focused O&E call and per our original response, the completion date sent on the IMA notice matched the completion date used in the Ad HOC with the exception of one date entry error on a completion notice. Qwest believes the clarification provided during the Focused O&E also resolves this question.

<u>Discrepancies on FOC Due Date (DD)</u>
KPMG expressed concern about discrepancies attributed to human error. In further research of root causes, Qwest has determined that there are 2 distinct categories of products that must be addressed when discussing the relationship between the FOC DD and the date used to calculate performance results. The first category includes digital loops and LIS trunks (for ease of reference, called "extended FOCs"). The second category includes all remaining products (referred to as "standard FOCs"). Each category is discussed separately below.

Extended FOCs

While it is appropriate to expect the FOC DD to be the measured date for Qwest's performance on these products, there are circumstances that Qwest believes warrant different treatment. Specifically, as a result of the collaborative efforts of Qwest and CLECs to make the FOC more meaningful, Qwest performs certain provisioning tasks before issuing the FOC. The process improvement has caused a slight inconsistency between the intent of the OP measures and the Due Date definition in the Definition of Terms contained within the PID.

If Qwest were to measure on time performance strictly based on the FOC DD, in scenarios where Qwest identifies a facility delay prior to issuing the FOC, that delay would not be captured in OP-6 nor would Qwest report a miss in OP-3. Qwest does not believe this was the intent of the due date definition; but rather an oversight when expanding the PID to accommodate the extended FOC process.

Qwest will propose a clarification to the definition of terms for ROC TAG consideration in order to resolve this conflict. Qwest will continue to report orders that fall into this scenario as misses and count the days delayed even though the FOC DD was met.

Standard FOCs

In the case of standard FOC products, the FOC is not delayed. Qwest determines the due date, based on CLEC DDD, standard interval and outside dispatch appointment scheduling, where appropriate. That due date is entered on the service order and the FOC without delay.

As a result of the process, there is an extremely high correlation between the due date placed on the service order and the due date reported on the FOC. However, human error can and will occur. Although Qwest is investigating possible enhancements to mechanization, Qwest believes the ongoing quality reviews performed by center coaches has resulted in increasing the level of accuracy and reducing human error to a reasonable rate.

Qwest has performed a 50% random sampling of December 2001 and January 2002 OP-3 records for standard FOC products. The sampling compared the service order due date to the FOC due date. The results for December, reflect a 94.9% match. For January the dates matched 97.6% of the time. Further, the service center's staff support organization recently conducted process reviews on orders processed the last 2 weeks in February (for products provisioned using the designed flow) as well as the first full week in March (for products provisioned using the non-designed flow). The results, albeit based on weeks of performance, reflect accuracy at levels consistent with the January study.

In conclusion, Qwest believes the occurrence of human error when reporting the FOC DD has continued to decrease and is within a zone of reasonableness when recognizing not all requests can be processed without human intervention. Therefore, Qwest requests KPMG re-analyze the results using the February data recently made available.

Attachment(s): None

As a result of the data integrity problems that KPMG Consulting has discovered while conduct its PID analysis and Qwest's responses to these problems this observation will be closed. The documentation of the issues addresses in this Observation as well as the issues addressed in Observation 3099 will be addressed in a new exception.

KPMG Consulting recommends closing Observation 3089 and escalating the unresolved issues to Exception 3120.

Initial Release Date (as O3099): February 25, 2002
First Response Date (as O3099): March 13, 2002
Second Response Date (as O3099): April 2, 2002

OBSERVATION REPORT

An Observation has been identified as a result of the evaluation of the RSOR data and the LSRs provided by Qwest in response to Exception 3103, with respect to dispatched UNE-Loop orders in the Central Region.

Observation:

KPMG Consulting has identified issues with the data that was used to calculate the PID OP-4.

Background:

According to the PID OP-4, Qwest is required to provision designed orders in 6 days when the product is ADSL Qualified, Analog, or 2 Wire Non-Loaded Loop. KPMG Consulting evaluated the RSOR data that was used for the calculation of this PID and issued Exception 3103 due to a failure with respect to the 6-day requirement. Qwest responded that 9 orders were incorrectly included in the calculation because they had customer requested intervals that were greater than the standard interval. KPMG Consulting noted that the flags in the RSOR database indicate that those orders should be included in the PID calculation. KPMG Consulting further requested the 240 LSR's related to the calculation of OP-4 for the Central Region for unbundled loops.

Issue:

With respect to the original issue associated with Exception 3103, Qwest's performance was shown to be meeting the benchmark after properly applying the exclusions to the orders. Thus, Exception 3103 was closed. However, in the course of analyzing the data associated with this exception a data issue surfaced that indicated nine orders that should have been excluded were not marked for exclusion by Qwest. KPMG stated in its response in Exception 3103: "KPMG Consulting used the field "NEG_DES" in the RSOR dataset to determine whether the customer negotiated a due date longer than the standard interval for designed services. For the nine orders in question, this field is marked with a '0', indicating the customer did not negotiate a longer due date for the designed services." In Qwest's response, Qwest determined that they had coded 6 of the orders incorrectly. In the other three, Qwest coded one field correctly (called SFSPO) and one field incorrectly (NEG_DES). Qwest, also in response to Exception 3103 stated that it is the SFSPO field in RSOR that determines whether an order should be excluded. Both KPMG Consulting and Liberty Consulting believe that the NEG_DES field is the one that is used for PID inclusion/exclusion.

Liberty Consulting has addressed the coding problem identified above in their Observation number 1032, and therefore, it will not be included as part of this observation. However, the issue of the proper field to use, SFSPO or NEG_DES, to determine the exclusions is still open and needs to be addressed by Qwest.

Additionally, because of these data issues, KPMG Consulting reviewed all 240 orders relevant to the PID for the Central Region to determine if there were further discrepancies with the data.

We found three additional issues:

1. Ten LSR's were not found by Qwest, despite being part of Qwest's RSOR database.
2. KPMG Consulting found two service orders that should have been included in the OP-4 calculations but were excluded.
3. KPMG Consulting found four additional orders that should have been excluded from the OP-4 calculations, but were included.

A separate confidential attachment will be issued that supplies the details for the orders that are discussed above.

Impact:

Out of 240 orders reviewed, 25 were mishandled in the calculation of the OP-4 PID, according to KPMG Consulting's determinations. If these determinations are correct, this issue has an impact on the accurate reporting of PID results.

Attachments: *Confidential Information*

Qwest Formal Response (03/04/02):

Both KPMG Consulting and Liberty Consulting are correct that the NEG_DES field is used for PID inclusion/exclusion of orders for OP-4. However, the NEG_DES field is calculated using other data points. The validity of NEG_DES is better understood in the context of the values contained in other data points as described below.

In the RRS Technical Document on page 13-36, it states:

- **Customer negotiated due date longer than the standard interval for designed services flag (NEG_DES)**

  If the designed services field is flagged yes, (SOADSR = Y), the negotiated due date field (SONDD) contains an X, and position 2 of the service provisioning overall field (SFSPO) contains an 'L', this indicates that the customer has negotiated a due date longer than the standard Qwest interval for designed services products. The NEG_DES field is flagged with a '1' if these conditions are true.

Based upon the criteria above, the NEG_DES field depends on the values of SOADSR, SONDD and SFSPO fields. If any of those fields contains a value different than the values specified above, then NEG_DES will contain zero ('0'). A zero (0) in this field indicates the record will be included in OP-4D or E.

The input errors detected in Observation 3103 occurred in the SFSPO source field, which is why the Qwest response focused on it. Therefore, depending upon the values placed in the SOADSR, SONDD and SFSPO will guide inclusion/exclusion criteria?

Regarding the three addition issues:

Ten LSR's were not found by Qwest, despite being part of Qwest's RSOR database.

1. The ten LSRs that could not be found from the initial request of 240 LSRs were finally located in the CRM archived database and will be provided with this response via the data request process.

KPMG Consulting found two service orders that should have been included in the OP-4 calculations but were excluded.

2. Qwest reviewed the two service orders and determined that one had been correctly excluded from the OP-4 calculation (***Redacted***) based on the criteria explained above, and the other one (***Redacted***) had an incorrect SFSPO due to a human error and should have been included in the OP-4 calculation.

KPMG Consulting found four additional orders that should have been excluded from the OP-4 calculations, but were included.

3. Qwest reviewed the four service orders and determined that two had been correctly included in the OP-4 calculation (***Redacted***) based on the criteria identified above, and the other two (***Redacted***) had incorrect SFSPOs due to human error and should have been excluded from the OP-4 calculation.

Qwest recommends closure of this observation.

Attachment(s): None

KPMG Consulting's First Response (03/13/02) :

Given the human errors acknowledged by Qwest above, KPMG Consulting believes a review of more recent data can help determine whether these problems have been corrected. KPMG Consulting would like to review the most recent data available after the problems were corrected (through training and/or automation). We will await Qwest's direction as to which month to review.

KPMG Consulting recommends Observation 3099 remain open pending further clarification from Qwest.

Qwest Response to KPMG Comments (03/18/02):

Qwest would like KPMG to review February data. Training was conducted in January and internal audits of orders began in January and continues today. Qwest believes human errors have been reduced significantly as we have seen during our internal audits and feel confident the improvements will be observed by KPMG.

Attachment(s): None

KPMG Consulting's Second Response (04/02/02)

As a result of the data integrity problems that KPMG Consulting has discovered while conduct its PID analysis and Qwest's responses to these problems this observation will be closed. The documentation of the issues addresses in this Observation as well as the issues addressed in Observation 3089 will be addressed in a new exception.

KPMG Consulting recommends closing Observation 3099 and escalating the unresolved issues to Exception 3120.

Qwest Formal Response to EXP 3120:

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.

KPMG Comments on EXP 3120 (04/08/2002):

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.

Per Qwest's reply comments to Observations 3089 and 3099, 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. In a confidential attachment, we attach both the KPMG Consulting 'view' of the data and the Qwest 'view' of the data, and ask that Qwest reconcile the discrepancies.

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

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.

The specifics of these discrepancies are all contained in a confidential attachment.

Based on the outstanding data integrity issues KPMG Consulting is encountering when comparing KPMG Consulting produced results to Qwest produced results, KPMG Consulting recommends that this exception remain open.

Qwest Response to KPMG Comments for EXP 3120 (04/11/2002):

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.

<u>Exclusions</u>:

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. 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 and 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.

<u>Dates and Intervals</u>:

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 due. 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.*
- *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".

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 is sue # 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-excepted) 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.
  - ✓ 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."

Attachment(s): None