

TI 813
EXCEPTION 3107 – DISPOSITION REPORT
Qwest OSS Evaluation

Initial Release Date: January 17, 2002
First Response Date: February 6, 2002
Second Response Date: February 12, 2002
Disposition Report Date: February 26, 2002

EXCEPTION DISPOSITION REPORT

Exception:

Qwest did not process Non-Design Edit transactions that were submitted to the Customer Electronic Maintenance & Repair (CEMR) system in the timeframe defined by the benchmark.

Summary of Exception:

The ROC TAG agreed to a benchmark standard of 0:00:24 for average processing time for Non-Design Edit transactions, as defined in the document *ROC M&R Volume Recommendation*, version 4.7, October 9, 2001. On January 10, 2002, the P-CLEC submitted Non-Design Edit transactions via the CEMR system. Qwest did not process Non-Design Edit transactions that were submitted to the Customer Electronic Maintenance & Repair (CEMR) system in the timeframe defined by the benchmark. Out of 36 Non-Design Edit transactions that were processed by Qwest, KPMG Consulting computed an average response time of 0:00:27 and has concluded that the difference of three seconds between the benchmark and Qwest's performance is statistically significant.

Summary of Qwest's Initial and Supplementary Responses:

The initial response from Qwest on January 31, 2002 indicated that Qwest used KPMG's description of the Non-Design Edit test to set up and conduct three separate tests in an attempt to replicate KPMG's test results. The three tests resulted in transaction times of 18.9, 18.1, and 22.4 seconds, respectively. The specifics of the three tests are identified within the Qwest response. Qwest indicated that the three tests were conducted during normal business hours. Qwest stated that all three of the tests included a significantly higher volume of transactions than required by the test plan and resulted in an average transaction performance below the 24 second benchmark.

For all three tests, Qwest provided confidential data, which included a count of the concurrent transactions that occurred within the testing window as well as the calculated average response time. Qwest also indicated that the confidential data demonstrated that typical business traffic occurred during the test window of each test. Based on the results of the three tests, Qwest concluded that the additional transaction time observed by the P-

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CLEC must have been due to the P-CLEC's environment, which is outside of Qwest's control.

On the Supplemental Response from February 12, 2002, Qwest stated that they successfully met all 13 benchmarks for the normal days. Qwest met the Non-Design Edit transaction benchmark of 24 seconds for the normal day. Qwest met 12 of the 13 benchmarks for the peak test day accounting for 98.2% of total transactions executed. Results for the peak day was 27 seconds, which was not within the benchmark for less than 2% of the total transactions executed. Qwest's performance for the stress day on this measure is consistent with performance for the peak day, i.e., 27 seconds.

Qwest prepared an M&R transaction analysis of the monthly CEMR Logs for the 6-month period August 6, 2001 through January 31, 2002. Qwest stated that Non-Design Edit transactions represented an average of 0.3 % of the CLEC actual transaction volume through CEMR for M&R during the period reported. Qwest concluded that although the results on this transaction of 3 seconds are statistically significant, the peak test failure on this measure is immaterial in light of the actual CLEC Non-Design Edit transactions being executed. Qwest stated that the self-administered tests were not an attempt to supplant the third party test and that the tests were conducted to identify any bottlenecks causing the delay in the time reported by the P-CLEC. Qwest concluded the response by stating that the failure to meet this benchmark does not constitute an "impediment" to the CLEC's ability to compete. Qwest requested that KPMG close this exception as "Closed/Unresolved".

Summary of KPMG Consulting's Initial and Supplementary Responses:

The approach taken by Qwest to conduct three internally administered tests is inconsistent with the methodology set forth and agreed upon by the ROC TAG. As defined in the document *ROC M&R Volume Recommendation*, version 4.7, October 9, 2001, the ROC TAG agreed to a third party test conducted by KPMG Consulting. Furthermore, there are no provisions in the *Master Test Plan* for consideration of Qwest-administered tests. KPMG Consulting concluded that the difference of three seconds between the benchmark and Qwest's performance is statistically significant and constitutes an unsatisfactory result.

KPMG Consulting conducted the Volume Stress Test on January 23, 2002. As part of this testing activity, KPMG Consulting observed Non Design Edit transactions under stress load conditions, which consisted of eight hours of 'normal' and four hours of 'stress' testing. For the combined twelve hour day, KPMG Consulting calculated a response time of 0:00:27 seconds. Additionally, KPMG Consulting separated the stress test day into 'Normal Hours Only' and 'Stress Hours Only' and calculated response times of 0:00:25 seconds and 0:00:28 seconds, respectively.

KPMG Consulting's Disposition Report (02/26/02):

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KPMG Consulting reviewed the second response provided by Qwest and acknowledges the request to close this Exception as unresolved.

KPMG Consulting recommends the closure of Exception 3107 and that it be categorized as closed/unresolved.