Test Vendor ID:	EXP 3107
Qwest Internal Tracking ID:	TI 813
Observation/Exception Title:	Non-Design Edit transactions
Test Type/Domain:	Test 16 - M&R Volume
***Date Qwest Received*:**	01/17/2002
***Initial Response Date*:**	01/31/2002
Supplemental Response Date:	02/21/2002

Test Incident Summary:

An exception has been identified as a result of the test activities associated with MTP Test 16, Phase III, M&R Functional and Performance Evaluation.

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.

Background:

For Non-Design Services, the menu within the CEMR system allows users to create a trouble report, perform feature verification, view the circuit history, send MLT, obtain line record detail, maintain trouble (edit) report, and view the transaction history of trouble reports.

The ROC TAG agreed to 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.

Issue:

On January 10, 2002, the P-CLEC submitted Non Design Edit transactions via the CEMR system. Once the transactions were submitted, KPMG Consulting computed the average transaction time. This calculation was based on the start and end processing times as documented by the P-CLEC.

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

KPMG Consulting has provided the details of the Edit transactions in a separate confidential document.

Impact:

Untimely processing of Non Design Edit transactions in CEMR could cause repair delays for CLECs, and may require additional resources to research the issue, thus potentially increasing operating costs. A CLEC's customer may experience decreased levels of satisfaction if unnecessary delays occur.

Qwest Formal Response:

Qwest used KPMG's description of the testing cited in this Exception to set up and conduct three separate tests in an attempt to replicate KPMG's test results. Those tests and their results are described below.

The first test was executed on January 18th, 2002 to verify the response time of three CEMR screens - *Non Design Service Menu, Maintain Trouble Report and Maintain Non Design Report*. Qwest executed the test within the Qwest firewall, accessed the external Internet and came back in through the Qwest ECOM web site using a digital certificate. The test included twenty-nine transactions in a one-hour period during the middle of the day. A peak one-hour time period would see only four transactions. The test was performed using a Pentium 3/500 machine and using only LoadRunner for the test.

The first test resulted in an average response time of 18.9 seconds.

(Please see Confidential Attachment A)

The second test was executed on January 24th, 2002 using the same screens identified in the first test. The second test was run from an offsite location accessing the external Internet via a DSL line. The requests accessed the ECOM web site using a digital certificate. This test was performed to eliminate the possibility of an internal router skewing the test by choosing an optimal route. The test executed thirty transactions in a one-hour period during normal business hours. Four transactions per hour is considered "peak" level of activity. The test was performed from a Pentium 2/400 machine using only LoadRunner for the test.

The second test resulted in an average response time of 18.1 seconds.

(Please see Confidential Attachment B)

The third test was run on January 29, 2002 at Qwest using WinRunner 6.02 and LoadRunner 6.2, on a Pentium 3/500 machine. The requests accessed the External Internet and re-entered the ECOM web site using a Digital Certificate. Again, the same three screens were tested. This test was performed to capture the impact of browser processing. Thirty transactions were executed in a one- hour window. A single transaction per hour is considered a "normal" load.

The third test resulted in an average response time of 22.4 seconds.
(Please see Confidential Attachment C)

The tests cited above were conducted during normal business hours. A count of the concurrent transactions that occurred within the testing window of all three tests is provided in Confidential Attachment D.

The data in Confidential Attachment D demonstrates that typical business traffic occurred during the test window of each test. 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.

Based on the results of the three tests described above, Qwest can only conclude that the additional transaction time observed by the P-CLEC, during their testing, must be due to the P-CLEC's environment, which is outside of Qwest's control.

KPMG Comments (02/06/2002):

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.

The M&R Volume tests were executed according to the agreed upon methodology and results were compared to the benchmarks approved by the ROC TAG. A benchmark of 0:00:24 was established for average processing time for Non Design Edit transactions. Qwest's performance for this transaction type was 0:00:27. 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 recommends that Exception 3107 remain open.

KPMG Supplemental Recommendation (02/12/2002):

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.

Qwest Response to KPMG Supplemental Recommendation (02/21/2002):

Qwest's overall performance on the M&R Volume Test was excellent. The approved ROC M&R Volume Recommendation, version 4.8, November, 13, 2001, specifies that the M&R volume test includes 2 normal days (12 hours at normal volume), 1 peak day (6 hours at normal volume and 6 hours at peak volume), and 1 stress day (8 hours at normal volume and 4 hours at stress volume for diagnostic purposes only). (The referenced document does not define an Edit transaction. This exception refers to the Edit transaction represented by the combined results of Add and Modify transactions.) The normal, peak, and stress tests measured Qwest's performance against benchmarks for 13 transactions.

Qwest 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 (start of the CEMR Log files) through January 31, 2002 (see attached). The analysis excluded all Qwest internal and P-CLEC transactions. Also, since Event transactions are not captured in the CEMR Log, by default they were excluded from the analysis. 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. Although the results on this transaction of 3 seconds (average 3 seconds per transaction under "peak" and "stress" conditions) 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's testing described in the previous response was not an attempt to supplant the third party test. The tests were conducted to identify any bottlenecks that may have caused the delay observed by the P-CLEC. The results of these tests were shared with KPMG to demonstrate that Qwest was unable to identify any problems and that performance for this transaction was observed to be within the benchmark cited by KPMG.

Qwest asserts that failure to meet this benchmark does not constitute an impediment to the CLEC's ability to compete. Qwest respectfully requests that KPMG close this exception and categorize it as "Closed/Unresolved".

Attachments: Confidential attachment sent via Data Request Process: CEMR_Trans_Count_Aug2001 thru Jan2002