TI 588 EXCEPTION 3055 – DISPOSITION REPORT

Qwest OSS Evaluation

Initial Release Date: September 27, 2001 First Response Date: October 15, 2001

Second Response Date: November 16, 2001

Third Supplemental Response Date: December 27, 2001

Fourth Response Date: January 16, 2002 Disposition Report Date: February 7, 2002

EXCEPTION DISPOSITION REPORT:

Exception:

Qwest's OSSLOG Trouble History contained inaccurate closeout codes for repairs completed to Plain Old Telephone Service (POTS) Resale and UNE-P services.

Summary of Exception:

KPMG Consulting has been conducting a test of Qwest's ability to find, repair, and accurately document the results of maintenance activities. Faults were placed on POTS Resale and UNE-P accounts and were reported through both manual and electronic processes. Once the faults were repaired, KPMG Consulting compared the Disposition and Cause (D/C) codes entered by Qwest in the OSSLOG Trouble History for each of the repairs, with the D/C codes KPMG Consulting expected to be entered based on the nature of the faults. Of the 201 faults placed, 124 (61.7%) were found to accurately reflect the fault placed on the circuit. The remaining 77 faults reflected inaccurately entered closeout codes in the Trouble History. KPMG Consulting applies a standard of 95% accuracy for the closeout codes to be entered into the Trouble History reports and Qwest is not meeting this standard.

Summary of Owest's Initial and Supplementary Responses:

Qwest initially agreed that 48 of 77 D/C codes provided in the Confidential Attachment were not accurate in the DLETH report for a 76.1% success rate. As a corrective measure to improve performance, Qwest increased the frequency of internal audits and expanded the scope of the FCC SAVER audits to improve the D/C code accuracy levels.

Upon further review, Qwest concluded that an additional 24 D/C codes were correct and requested a meeting with KPMG Consulting to review their assessment. At the conclusion of the meeting, KPMG Consulting agreed with Qwest's assessment however, even after reclassifying these as accurately coded D/Cs, Qwest's performance (88.1%) was still below the benchmark of 95%. Therefore, it was agreed a retest would be required.

¹ This standard is based on KPMG Consulting's professional judgment.



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Retesting activities revealed that Qwest accurately coded 108 of 122 (88.5%) circuits. Qwest noted that they had made significant improvement over initial testing (61.7%) and committed to completing additional training for all COTs on the proper methods and procedures for closing trouble tickets. Qwest also reemphasized that continued training would occur to ensure accurate coding of D/C codes. Qwest requested that KPMG Consulting re-assess how it evaluates D/C codes by considering their relationship to the work group making the actual repairs. Qwest maintained that although all four digits of the Disposition Codes may not be correct, performance metrics only consider the first two digits therefore any discrepancies involving the last two numbers are not relevant. In addition, Qwest claimed that there is no impact to CLECs. Qwest asked KPMG Consulting to consider this information and re-evaluate the retest results. In the event KPMG Consulting disagreed with Qwest's position, Qwest requested that this Exception be closed as "Closed/Unresolved".

KPMG Consulting's Disposition Report (02/07/02):

Summary of KPMG Consulting's Retest Activities

KPMG Consulting conducted additional testing during November 2001 to retest the accuracy of close out codes (primarily disposition codes). Retesting and subsequent discussions indicated that 108 out of 122 "dispatch in" and "dispatch out" accounts were closed out properly for a success rate of 88.5%.

KPMG Consulting reviewed each incorrectly coded trouble and attempted to assess the direct relationship to CLECs and metrics, placing emphasis on the accuracy and importance of the last two digits. KPMG Consulting could not conclude that incorrectly coded closeout codes (including when the last two digits are incorrectly coded) would be of no impact to CLECs. Furthermore, Disposition (close-out) Codes are used to report on performance in corporate and regulatory reports. This data can be used to characterize the types of faults reported by CLECs/customers. Incorrect closeout codes could distort performance results that are reported to regulatory agencies and others.

Summary of KPMG Consulting's Retest Results

KPMG Consulting has noted that Qwest has completed additional training regarding the closure of trouble tickets on 1/31/2002. However, Qwest is still not meeting the 95% benchmark and has requested that no additional testing be conducted. KPMG Consulting reaffirms its response of 01/17/2002 and believes that the results of the retest, still constitute an unsatisfactory result. KPMG Consulting acknowledges Qwest's request to close this Exception as "Closed / Unresolved".

KPMG Consulting recommends closure of Exception 3055 and requests that it be categorized as "Closed / Unresolved".

