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<i>Test Vendor ID:</i>	EXP 3055
<i>Qwest Internal Tracking ID:</i>	TI 588
<i>Observation/Exception Title:</i>	Plain Old Telephone Service
<i>Test Type/Domain:</i>	Test 18 – M&R End to End
<i>Date Qwest Received:</i>	09/27/2001
<i>Initial Response Date:</i>	10/04/2001
<i>Supplemental Response Date:</i>	11/02/2001
<i>2<sup>nd</sup> Supplemental Response Date:</i>	01/10/2002
<i>3<sup>d</sup> Supplemental Response Date:</i>	01/28/2002
<i>4<sup>th</sup> Supplemental Response Date:</i>	02/01/2002

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***Test Incident Summary:***

An exception has been identified as a result of the test activities associated with MTP Test 18, M&R End to End Trouble Reporting.

**Exception:**

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

**Background:**

When Qwest receives a trouble report, it dispatches a technician to investigate the trouble. If a repair is made on an identified problem, Qwest enters a code number (referred to as a “disposition code”) into the OSSLOG Trouble History to identify the type and/or location of the problem repaired by its technician. A code number is also to be entered for the cause (referred to as a “cause code”) of the trouble repaired. The OSSLOG Trouble History ensures that Qwest has complete and accurate data regarding the types and frequency of problems reported and repaired.

KPMG Consulting has been conducting a test of Qwest’s ability to find, repair, and accurately document the results of maintenance activities where specific faults have been placed and reported through a combination of manually and electronically reported troubles. KPMG Consulting applies a standard of 95% accuracy for the close-out codes to be entered into the Trouble History reports.<sup>1</sup>

**Issue:**

KPMG Consulting placed faults on POTS and UNE-P service accounts, and requested through the normal wholesale reporting process that Qwest repair the circuits. Once the faults were repaired, KPMG Consulting compared the close-out codes entered by Qwest in the OSSLOG Trouble History for each of the repairs, with the codes KPMG Consulting expected to be entered based on the nature of the faults. Of the

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<sup>1</sup> This standard is based on KPMG Consulting’s professional judgment.



201 faults placed, 124 (61.7%) were found to accurately reflect the fault placed on the circuit. The remaining 77 faults reflected inaccurately entered close-out codes in the Trouble History.

KPMG Consulting has provided the details of the 77 faults in a confidential attachment.

**Impact:**

Inaccurate close-out codes could reduce Qwest's ability to detect consistent problems reported by CLECs. This could prevent Qwest from being able to repair problems before they are reported by CLECs. This could also cause a CLEC's customers to experience avoidable problems that could reduce their level of satisfaction with a CLEC.

***Qwest Formal Response:***

Qwest has reviewed Exception 3055 and the Confidential Attachment and agrees that 48 disposition and cause (D/C) codes are inaccurate. However, Qwest research indicates that 29 of the D/C codes accurately reflect the trouble found. The *Confidential Information, Exception 3055 (TI588)* attachment provided with this response has been expanded and included as a supplement to Qwest's response. Columns have been added indicating the D/C codes that Qwest agrees or disagrees are inaccurate. An explanation is provided for all disputed D/C codes.

Qwest research of the information in the Display Long Extended Trouble History (DLETH) Report indicates the same D/C codes that KPMG provided in the Confidential Attachment. The D/C codes should match the trouble history narrative in the DLETH report, not the specific faults placed by KPMG. The narrative reflects the action taken by the technician to resolve the trouble.

D/C code entry accuracy is reviewed monthly with each technician. Coding errors are discussed between the supervisor and technician emphasizing accuracy improvement. When new codes are added, technicians will receive updates as they occur.

The FCC, Sampled and Verified Employee Reporting (SAVER) audit will incorporate the review of D/C codes for accuracy in the future. Qwest has implemented quarterly audits throughout the Local Network Organization to improve D/C coding accuracy. Coding errors identified during these audits will be provided to the responsible Directors and Supervisors for corrective action.

In conclusion, Qwest agrees that 48 of 77 D/C codes provided in the Confidential Attachment are not accurate in the DLETH report. However, Qwest research indicates that 29 of the D/C codes accurately reflect the trouble found. Qwest has increased the frequency of internal audits and expanded the scope of the FCC SAVER audits to improve the D/C code accuracy levels.

***KPMG Comments (10/15/2001):***

KPMG Consulting initially reviewed 201 troubles, and reported that 124 (61.7%) reflected accurate coding. Qwest has responded to this exception, modifying the number accurately coded as being 153. While KPMG Consulting still has issues with some of the codes Qwest believes were correctly coded, based on Qwest's response, further investigation is not warranted. Qwest concurs that 153 out of 201 (76.1%) are accurately coded, which still places the final result below the 95% benchmark used as the quality measure for this test.

***Qwest Supplemental Response (11/02/2001):***

Qwest has further reviewed Exception 3055 and the Confidential Attachment and agrees that 24 of the 201 Disposition and Cause Codes were incorrect. Those items are identified in the Updated Confidential



Attachment with an “N” in the column marked Correct/Arguable/No and an “N” in the column marked Y/N.

Qwest also concluded that on 24 of the trouble reports mentioned in the updated Confidential Attachment the Dispatch and Cause Codes were correct. Those items are identified with a “C” in the Correct/Arguable/No column.

The 14 items identified with an “A” (arguable) are items that Qwest feels there could be legitimate explanations for the coding. Those reasons include:

- “Cut to Clear” tickets where the line was cut to a new cable pair
- Test bed lines that had multiple trouble conditions
- Trouble tickets where trouble condition was identified and removed prior to dispatch taking place
- Central Office trouble tickets that were identified as trouble out due to close proximity of the DMARC to the Central Office
  
- The 38 items that are identified with an “Y” in the Y/N column are items that Qwest feels that the Test Bed design or Test 18.6 processes impacted the Disposition and Cause Codes.

A meeting took place on 10/30 between Qwest and KPMG to discuss this Exception and the following decisions were made:

- A re-test of the ability of Qwest to accurately document Disposition and Cause Codes will be required
- KPMG will analyze the items on the Confidential Attachment that were determined by Qwest to be correct, arguable or impacted by Test Bed conditions and make changes to Test 18.6 methodology so that the re-test results will be more accurate
- Preparation for a re-test can begin immediately

Qwest recommends a meeting with KPMG prior to the re-test to ensure that the improvements in the Test 18.6 procedures will make the test results more accurate.

### ***KPMG Supplemental Recommendation (11/16/2001):***

In its 11/02/01 response, Qwest agreed with KPMG Consulting’s assessment that 24 of 201 accounts were coded incorrectly, and as a result a retest will occur.

Retesting activities will include inputting troubles on 35 “dispatch in” accounts and 35 “dispatch out” accounts. Results will be analyzed by comparing the coding displayed in the DLETH header row with the narrative input by the technician in the body of the DLETH.

Based on Qwest’s response, KPMG Consulting recommends that Exception 3055 remain open pending successful retest activities.

### ***KPMG 2<sup>nd</sup> Supplemental Recommendation (12/27/2001):***

As a part of additional testing conducted by KPMG Consulting during November 2001, the accuracy of close out codes (primarily disposition codes) has been retested. Retesting indicates that 106 out of 122 “dispatch in” and “dispatch out” accounts were closed out properly for a success rate of 86.9%.

Qwest’s performance of 86.9% falls below KPMG Consulting’s standard of 95% accuracy for closeout codes to be entered into the Trouble History reports and the DLETH history transactions.



KPGM Consulting recommends that Exception 3055 remain open pending a successful fix and subsequent retest activities.

***Qwest Response to KPMG 2<sup>nd</sup> Supplemental Recommendation (01/10/2002):***

Qwest has researched and analyzed the sixteen Telephone Numbers on KPMG's Confidential Attachment. A summary of our analysis is documented below.

An Observation and Exception (O&E) conference call took place on 01/09/02 to discuss this Exception. During this call, KPMG, stated that according to their own investigation, Reference Number 9 had been coded properly.

**Disposition Code Analysis:**

**Reference Number 4 & 7:**

Qwest research indicates that the first three characters in the 4 character disposition codes were correct for Reference Numbers 4 and 7. The first three characters provide the trouble location (i.e., distribution frame ). The fourth character is designed to provide more detail for the trouble disposition.

Specifically for reference numbers 4 and 7, disposition code 0530 was utilized and indicates the trouble was repaired in the Central Office at the distribution frame. The fourth character of the disposition code would provide additional details about the work action the Central Office Technician performed to repair the trouble. Had the technician entered all four disposition code characters, "0532", the last character of the disposition code would identify that the technician fixed a broken jumper at the distribution frame. This information is noted in the narrative section of the trouble ticket that is provided to the CLECs. Ultimately, the correct entry in the fourth character of the disposition code does not impact the CLECs.

All COTs will be retrained on the proper methods and procedures for closing trouble tickets by January 31, 2002 per Qwest's process, *Central Office Non-Design (ND) Ticket Training, Revision Date; 05/19/1999*. This internal confidential document will be provided to KPMG through a Data Request associated with this Exception.

**Reference Number 15:**

Qwest research indicates that correct disposition code was used for Reference number 15. The stated inserted trouble for reference number 15 was an open placed at the customer premises. The trouble was dispatched out correctly and the field technician discovered a broken jumper at the demarcation point on the customer premises. The field technician also did a cable pair transfer and used a disposition code of 0401. Disposition code 0401 is associated with a cable pair transfer action. The field technician coded the trouble to disposition code of 0401, which is associated with the repair activity closest to the central office. The trouble was correctly repaired and the appropriate disposition code was used.

**Conclusion:**

Qwest research, along with KPMG's analysis on reference 9, indicates four of the sixteen accounts used accurate disposition codes. Based on this, 110 out of 122 trouble tickets were closed with accurate disposition codes resulting in a coding accuracy rate of 90.2%.

Qwest has progressed, from 61% for the first test to 90.2% in the second test, in dispatching repair tickets correctly and using correct disposition codes. According to the test samples, Qwest accuracy has improved over 28%. Also, thirteen of the sixteen trouble tickets on the confidential attachment were dispatched to the correct location, according to the trouble insertion information provided by KPMG; thereby, resolving the trouble in a timely manner.



The trouble ticket auditing and review process that Qwest deployed after the first test has improved the results of this test by 28.5%. Qwest will continue these audits and training to ensure continued improvement.

Qwest will provide the internal confidential document, *Central Office Non-Design (ND) Ticket Training*, Revision Date; 05/19/1999, to KPMG through a Data Request associated with this Exception.

***KPMG 3<sup>rd</sup> Supplemental Recommendation (01/17/2002):***

As discussed on the 01/09/02 exception call, KPMG Consulting agreed with Qwest that 2 of the 16 troubles originally identified as incorrectly coded were actually coded correctly. In addition, KPMG Consulting agreed to re-examine the remaining 14 incorrectly coded troubles to assess the degree of impact these incorrectly coded troubles could have on CLECs.

KPMG Consulting reviewed each incorrectly coded trouble and attempted to assess the direct relationship to CLECs and metrics. KPMG Consulting could not conclude that incorrectly coded closeout codes 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.

KPMG Consulting reviewed the actions taken by Qwest to improve closeout code accuracy and has concluded that these actions have resulted in a significant improvement in performance. KPMG believes that further improvement is possible through continuation of remedial training and management oversight.

Based on the errors in coding and the possible impacts that could result from coding errors, KPMG Consulting recommends that Exception 3055 remain open.

***Qwest Response to KPMG 3<sup>rd</sup> Supplemental Recommendation (01/28/2002):***

DLETH report narratives are accurate in identifying where the trouble occurred and the action taken to resolve the trouble. Qwest maintains the information provided in the narrative is sufficient to allow the CLECs to provide quality service to their customers. Therefore, incorrect disposition/cause codes alone would not adversely affect the CLEC community. The DLETH report narratives are available to CLECs through CEMR. In addition, when a CLEC calls into Qwest's Repair Call Handling Center (RCHC) and requests information, the closing narrative is read to the CLEC, rather than the disposition/cause codes.

Further, the last two digits of the disposition codes have virtually no affect on CLECs, Qwest service to CLECs, or PID performance. The PID measurements do not use the last two characters of the disposition code in any results. For example, the PID measurements only use the first two characters of the disposition code to exclude non-Qwest trouble from the PID measurements. Only the last two characters of the disposition code were incorrectly coded for 8 out of the 14 observations on the confidential attachment, and therefore, would have no impact. By excluding the previous 8, the disposition codes were incorrect for only 6 of the 122 total observations which equates to 95% compliance as described above.

Since the first test, Qwest has implemented the following audits and reviews. D/C code entry accuracy is reviewed monthly with each technician. Coding errors are discussed between the supervisor and technician emphasizing accuracy improvement. When new codes are added, technicians will receive updates as they occur. The FCC Sampled and Verified Employee Reporting (SAVER) audit will incorporate the review of D/C codes for accuracy in the future. The FCC SAVER audit samples Design Long Extended Trouble History (DLETH) reports to determine the percent of time technicians spend on non-regulated services



versus regulated services. The SAVER audit is a FCC mandated requirement to allocate technician's time reporting correctly between non-regulated and regulated services. Qwest has implemented quarterly audits throughout the Local Network Organization to improve D/C coding accuracy. Coding errors identified during these audits will be provided to the responsible Directors and Supervisors for corrective action. In addition, Qwest research indicates that 12 of the 14 incorrect disposition/cause codes on the confidential attachment were attributable to Qwest Central Office Technicians (COTs). Therefore, all COTs will be retrained on the proper process of closing trouble tickets with accurate disposition/cause codes. The training will be completed by 01/31/02.

Qwest has improved disposition and cause code reporting accuracy from 61 % on the first test to 88.5 % on the second test. The trouble ticket auditing and review process that Qwest deployed after the first test has improved the results by 27.5 %. KPMG has acknowledged that Qwest actions have significantly improved reporting results. Qwest will continue these audits and training to ensure continued improvement.

Additionally, neither Qwest, nor the MTP, recognizes the 95% benchmark established by KPMG. If KPMG cannot re-evaluate and successfully close this Exception, then Qwest respectfully requests that KPMG close this Exception and categorize it as "Closed/Unresolved".

***Qwest Supplemental Response (02/01/2002):***

Qwest committed to the following action item in the 1/10/02 response:

*"All COTs will be retrained on the proper methods and procedures for closing trouble tickets by January 31, 2002 per Qwest's process, Central Office Non-Design (ND) Ticket Training, Revision Date: 05/19/1999."*

Qwest completed the retraining effort on 1/31/02.

***Attachment(s):*** None