

TI 605
EXCEPTION 3058 - DISPOSITION REPORT
Qwest OSS Evaluation

Initial Release Date: October 3, 2001
First Supplemental Response Date: October 18, 2001
Second Supplemental Response Date: November 21, 2001
Disposition Report Date: January 3, 2002

EXCEPTION DISPOSITION REPORT

Exception:

KPMG Consulting has identified concerns that Qwest Communications did not successfully repair all of the Plain Old Telephone Service (POTS) Resale, UNE-P, and UNE-L circuits submitted for repair.

Summary of Exception:

KPMG Consulting placed faults on POTS Resale, UNE-P, and UNE-L accounts, and requested that Qwest repair the troubles through the normal wholesale repair process. Once the faults were repaired, KPMG Consulting revisited the locations where the faults were inserted to verify that the fault placed was repaired. A significant number of these lines were not found to be repaired when revisited although they were reported back to KPMG Consulting as being cleared and closed through Qwest's M&R process. If Qwest technicians report that troubles have been repaired, when in fact they have not, a CLEC could incorrectly notify its customers that the repairs have been completed. This would result in increased operating expenses for the CLEC in addition to decreased customer satisfaction with the CLEC because of unmet expectations.

Summary of Qwest's Initial and Supplementary Responses:

On October 12, 2001, Qwest responded to Exception 3058. The initial response indicated that Qwest researched the telephone numbers, provided by KPMG Consulting to determine if repair records indicated trouble isolation and closure activities for each circuit. Qwest responded that their records showed that the majority of the troubles, identified by KPMG as not being fixed, were processed properly and that they had insufficient information to respond to KPMG's assertion that these troubles were not cleared. In addition, Qwest asserted that performance with regard to successful repair of trouble was governed by the MR7 PID and concluded that they were in compliance with PID MR7.

On October 25, 2001, Qwest issued a response to KPMG Consulting's October 18, 2001 comments on the initial response. In the second response, Qwest reiterated that repair quality, or its ability to verify closed trouble tickets as repaired, was correctly captured by the PID MR-7 and that neither Qwest, nor the MTP, recognized the 95% benchmark established by KPMG. Qwest requested that in light of the differing views posited by Qwest and KPMG Consulting, that KPMG Consulting close the Exception and categorize it as "closed/ unresolved".

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On November 16, 2001, Qwest issued a supplemental response to their second response on October 25, 2001. Qwest maintained its second response with data to support its conclusion and provided details of additional research conducted by Qwest.

KPMG Consulting's Disposition Report (01/03/02):

Summary of KPMG Consulting's Response Activities:

October 18, 2001, KPMG Consulting issued its first response to Qwest's initial response to Exception 3058. KPMG Consulting asserted that it had provided adequate information on the accounts in question for Qwest to properly research. KPMG Consulting also addressed that the exception was not intended to validate Qwest's performance using criteria outlined in PID MR-7, and that any such reference to PID MR-7 was inappropriate for the results reported by KPMG Consulting for this exception. KPMG Consulting requested that Exception 3058 remain open for further evaluation.

November 21, 2001, KPMG Consulting issued a second response to Qwest's October 25, 2001 and November 16, 2001 supplemental responses. KPMG Consulting restated that it did not recognize PID MR-7 as an appropriate evaluation criteria approved by the ROC TAG committee for Test 18. In addition, KPMG Consulting maintained the position that applying the 95% benchmark for successful repair of Plain Old Telephone Service (POTS) Resale, UNE-P, and UNE-L circuits submitted for repair is appropriate. In response to Qwest's formal request to close Exception 3058 as unresolved, KPMG Consulting agreed due to the fact that Qwest and KPMG Consulting disagree on appropriate evaluation criteria for this Exception.

Summary of KPMG Consulting's Responses:

KPMG Consulting believes the test criteria to be correct and based on physical verification, believes the test results to be correct as reported. Qwest and KPMG Consulting disagree on the performance standard used by KPMG Consulting to evaluate Qwest's performance and disagree over whether or not the troubles cited in this Exception were correctly resolved.

Based on Qwest's request, KPMG Consulting closes Exception 3058 as unresolved.