



Test Vendor ID: EXP 3058
Qwest Internal Tracking ID: TI 605
Observation/Exception Title: Unsuccessful Repair of Circuits
Test Type/Domain: Test 18 - M&R End to End
Date Qwest Received: 10/02/2001
Initial Response Date: 10/12/2001
Supplemental Response Date: 10/25/2001

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 did not successfully repair all of the Plain Old Telephone Service (POTS) Resale, UNE-P, and UNE-L circuits submitted for repair.

Background:

When Qwest receives a trouble report, it dispatches a technician to investigate the trouble and perform any necessary repairs. KPMG Consulting has been testing Qwest's ability to find, repair, and accurately document the results of repair activity where specific faults are placed. KPMG Consulting applies a standard of 95% success rate for the troubles for which repairs are required.¹

Issue:

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. Of the 259 faults placed, 239 (92.28%) were correctly repaired.

KPMG Consulting has provided a list of the 20 POTS Resale, UNE-P, and UNE-L accounts that were not repaired in a separate confidential attachment.

Impact:

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 could result in increased operating expenses for the CLEC as a result of the additional resources required to investigate the issue.

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



Additionally, a CLEC’s customers may experience decreased levels of satisfaction with the CLEC because of unmet expectations.

Qwest Formal Response:

Qwest researched the telephone numbers, provided by KPMG in a confidential attachment, to determine if repair records indicate trouble isolation and closure activities for each circuit were properly completed. Qwest records indicate that the majority of the troubles, identified by KPMG as not being fixed, were processed properly. Qwest has insufficient information, however, to respond to KPMG’s assertion that these troubles were not cleared.

Qwest’s performance measure for repair quality is PID MR7 Repair Repeat Report Rate. PID MR7 specifically measures repeat troubles on the same circuit for a 30 day period. If, for example, an initial trouble is cleared by Qwest and a subsequent trouble is reported on the same line, the second trouble counts against the repeat report rate. In other words, PID MR7 evaluates whether Qwest successfully repaired the trouble reported in the first instance, which is exactly the issue that KPMG is addressing in this exception.

Further, Qwest’s parity performance is in compliance with PID MR7. The table below provides Qwest regional repeat report data for the type of circuits included in this exception. Specifically, it compares PID MR7 results for Qwest retail single line business/residence, UNE-P, UNE-L, and DS0 special circuits against wholesale regional performance for the month of August, 2001, and also compares retail results against the test sample results for this exception. The results show that the repeat trouble report rate was 15.9% for retail, 14.8% for wholesale, and only 7.7% for the troubles that were the subject of this Exception. This demonstrates that Qwest’s parity performance is in compliance with PID MR7, and further demonstrates that Qwest’s resolution of the trouble reports in this Exception was well within the governing PID MR7 measure.

	Qwest Retail	Wholesale	KPMG
MR7 – Repair Repeat Report Rate	15.9%	14.8%	7.7%

Conclusion:

Qwest performance with regard to successful repair of trouble is governed by the MR7 PID, which specifically addresses this issue. Again, from a parity perspective, Qwest is in compliance with PID MR7.

KPMG Comments (10/18/2001):

KPMG Consulting stated that of the 259 faults placed, 239 (92.28%) were correctly repaired. KPMG Consulting believes that the confidential attachment it provided Qwest in the original exception supplies Qwest with all the information needed in order to properly research the referenced accounts that KPMG Consulting asserts were not repaired.

KPMG Consulting applies a standard of 95% success rate for the troubles for which repairs are required. This exception is not intended to reflect Qwest’s performance using criteria outlined in any PID, such as PID MR-7, as referenced by Qwest in its response. As such, any reference to PID MR-7 is inappropriate for the results reported by KPMG Consulting for this particular exception.



KPMG Consulting would like to reiterate that its evaluation criteria not only measures Qwest's ability to clear and close trouble tickets, but rather emphasizes that the accounts are verified as "repaired".

KPMG Consulting recommends that Exception 3058 remain open.

Qwest Response to KPMG Comments (10/25/2001):

It is Qwest's position that repair quality, or its ability to verify closed trouble tickets as repaired, is correctly captured by the PID MR-7. The stated purpose of PID MR-7, Repair Repeat Report Rate, is: "***Evaluates the accuracy of repair actions***², focusing on the numbers of repeated trouble reports received for the same trouble within a specified period (30 calendar days)." There is no practical or accurate way to establish a benchmark based on data alone. Parity is the only appropriate determinant for repair quality. Qwest is meeting PID MR-7. Further, for the given test sample, Qwest's repair performance compares favorably with both Qwest's Wholesale and Retail performance under PID MR-7. Additionally, neither Qwest, nor the MTP, recognizes the 95% benchmark established by KPMG. In light of the differing views posited by Qwest and KPMG, Qwest respectfully requests that KPMG close this Exception and categorize it as "closed/ unresolved".

Attachment(s): None

² Emphasis added.