

DEVELOPMENT AND EXECUTION OF THE ROC THIRD PARTY TEST

A brief description of the development and execution of the Regional Oversight Committee (“ROC”) Third Party Test is included below.

A. Background and Structure

As a first step in the development of an independent third party test, the ROC created an Executive Committee, now comprised of five state regulatory commissioners, as well as a Steering Committee comprised of seven state regulatory staff agencies.¹ The task of these committees was to hire vendors to administer the test, as well as negotiate and oversee the overall test process. The Executive Committee reviewed the overall progress of the test. The Steering Committee oversaw the test process, assisted in developing and implementing the test, and was the first point of escalation for resolving test issues.

In July 1999, the ROC selected the National Regulatory Research Institute (NRRI) to serve as project administrator for the third party test. The NRRI was responsible for coordinating and providing advice, research and assistance to the Executive Committee and the Steering Committee. The NRRI also functioned as a liaison between the ROC, the DoJ and the FCC with respect to the test.

Next, the ROC created a TAG to handle the day-to-day operations of the test. The ROC TAG was – and still is – a collaborative forum comprised of – and open to – representatives of the ROC, Commission staff, test vendors, CLECs, industry associations, consumer groups, and Qwest. The purpose of the TAG is to enable the parties to work together in an informal but

¹ Initially, the Executive Committee was comprised of five commissioners.

structured environment in designing and evaluating the test process to ensure that CLECs have access to Qwest's OSS in a manner that provides them with a meaningful opportunity to compete in the marketplace for local service. The TAG provides technical assistance and subject matter expertise in test planning and execution and assists in reviewing test results. Any party that wishes to participate can become a member of the TAG, and parties today continue to attend TAG sessions as they deem fit.

In September 1999, the ROC hired Maxim Telecom Consulting (MTG) to act as the project manager for the third party test. MTG has been responsible for representing the state regulatory agencies in day-to-day test management, including observing testing to ensure fairness and managing the overall schedule and quality of the test. MTG has played a pivotal role in managing interaction between the ROC and test vendors, facilitating resolution of key issues from the TAG, Steering and Executive Committees, and moving the entire project to closure.

With MTG's guidance, the TAG immediately initiated discussions to determine the scope of the test. Thereafter, the TAG met weekly – usually by telephone conference – to discuss and decide every issue relating to the scope, implementation, and execution of the test.

In late 1999 and early 2000, the TAG held several face-to-face meetings to discuss and agree on test principles, performance measures, and on the documents that describe the test. These principles and performance measures were eventually identified and described in the Test Requirements Document (TRD). The TRD, a high level document that defines the major aspects of the test, was finalized in March 2000.

In July 2000, through a competitive bid process, the ROC contracted with three additional parties to assist in implementing and administering the third party test. Specifically,

the ROC retained KPMG, an entity with considerable experience in evaluating OSS, to serve as the test administrator.² The ROC also hired HP to serve as a pseudo-CLEC in the testing process.³ Finally, the ROC hired Liberty to conduct a comprehensive audit of the PIDs developed by the TAG to ensure that Qwest was properly measuring and recording its commercial data.

KPMG, as Test Administrator, developed the Master Test Plan (MTP) based on the TRD. Unlike the TRD, which is a high level document that defines the major aspects of the test, the MTP sets forth a comprehensive plan for evaluating Qwest's OSS.

In addition to developing the TRD and MTP, the TAG sought and reached agreement on a comprehensive set of measurement definitions, called the Performance Indicator Definitions (PIDs), which describe the manner in which Qwest's performance is measured in both a commercial setting and for purposes of the test. These PIDs, which include "benchmarks" or required levels of performance, were developed by the TAG concurrent with the development of the TRD and MTP. Rather than negotiate the ROC PIDs from scratch, however, the TAG built upon existing performance measures reached in the collaborative OSS test conducted by the Arizona Corporation Commission.

The TRD, MTP, and PIDs – individually and together – represent an unprecedented and comprehensive collaboration between the CLECs, state commission staff members, test vendors, and Qwest. The parties to the ROC invested substantial resources and effort, including many hours in face-to-face meetings, to reach agreement on nearly each and every word in those

² KPMG was the lead test administrator for Bell Atlantic's OSS test in New York, which was the first successfully-completed OSS test in the nation, as well as the third party test administrator in a number of other states.

³ The pseudo-CLEC's role was to emulate a CLEC by establishing a business relationship and conducting on-going business with Qwest. To ensure that the pseudo-CLEC obtained unbiased information regarding Qwest's

documents. Through these efforts, the parties reached consensus on hundreds of issues. In fact, there were only a small number of issues on which the parties could not reach agreement.

When the parties could not agree on an issue, they turned to an impasse resolution process that was established by the TAG. When agreement could not be reached within the TAG, the matter was escalated to the Steering Committee for resolution. If a party was dissatisfied with the Steering Committee's decision, it could escalate the dispute further to the Executive Committee. Although some intra-TAG disputes required escalation to the Steering Committee and in some cases the Executive Committee, the vast majority of issues were resolved through the collaborative process within the TAG.

B. Test Execution

Testing was conducted pursuant to the scenarios presented in the MTP. As each test was administered, each of the relevant test vendors identified any issue(s) that required explanation, clarification or modification by Qwest. These issues were then reviewed through the "Observation and Exception" process, wherein the vendor documented the shortcomings, if any, in Qwest's performance.⁴

As Exceptions and Observations were identified, the ROC process required KPMG (or the relevant vendor) to develop a written description of the issue for Qwest. Qwest then responded in writing to each Observation and Exception, providing supplemental information where necessary in an effort to alleviate the concern. The ROC process also permitted CLECs to submit written questions and comments during each step in this process, which encouraged

OSS, Qwest's operational personnel were "blind" to the identity of the pseudo-CLEC.

⁴ Generally, an "Observation" is a means of identifying either of the following: (1) a question regarding an area of a Qwest component being tested that the vendor cannot answer without additional guidance from Qwest; or (2) a potential deficiency in a Qwest component that could contribute to a negative finding. An "Exception" is a means of identifying a deficiency in a Qwest component that may result in a negative comment if left unresolved. Generally,

collaboration. To ensure that the issues were addressed appropriately, a weekly telephone conference call was held between Qwest, the relevant test vendor(s) and any interested CLEC to discuss pending Observations and Exceptions.

As described in the TRD and detailed in the MTP, the ROC third party test was performed through a series of transactional and operational evaluations. These evaluations tested the five primary components of Qwest's OSS – pre-ordering, ordering, provisioning, maintenance and repair, and billing – as well as the technical assistance Qwest offers CLECs and Qwest's Change Management Plan. The primary sub-tests in the ROC OSS evaluation are briefly described below.

1. Pre-ordering, Ordering, and Provisioning Functional Evaluation (Tests 12, 12.7, 12.8, 14, 14.7 and 14.8)

There were multiple tests that collectively validated the existence, functionality, and behavior of the Qwest interfaces (including IMA-GUI) and processes for pre-ordering, ordering, and provisioning.⁵ Additionally, these tests evaluated generally Qwest's Wholesale performance in these areas in comparison to its Retail systems.⁶ The tests consisted of live transactions submitted through the IMA-GUI, IMA-EDI, and EXACT electronic interfaces. This evaluation was intended to examine an end-to-end view of the pre-ordering through provisioning processes, and included a mix of stand-alone pre-ordering transactions, along with pre-order transactions followed by LSRs, supplements and cancels. In addition, this test intended to compare actual functionality to Qwest's OSS documentation.⁷

Another component of this evaluation was a comprehensive review of the methods and

an Observation represents a concern that has not risen to the level of an Exception.

⁵ See *Final Report* at 63.

⁶ *Id.*

procedures used to handle orders that have been manually submitted or require manual intervention during order processing.⁸ This evaluation also included a comprehensive review of Qwest's provisioning processes. Specifically, KPMG evaluated Qwest's ability to properly provision orders and timely complete them;⁹ whether Qwest's Wholesale provisioning processes are in parity with those used by Qwest's Retail operations;¹⁰ and Qwest's processes used to support coordinated provisioning with CLECs.¹¹

2. Order Flow-Through Evaluation (Test 13)

This evaluation verified Qwest's ability to mechanically convert LSRs into service orders without manual intervention for all order types that are designated as flow-through by Qwest.¹² It also validated that the flow-through capabilities of Qwest's systems are consistent across the three regions.

3. Pre-ordering, Ordering, and Provisioning Volume Performance Test (Test 15)

This test measured Qwest's system capacity for processing pre-ordering queries and order transactions. It was designed to identify potential choke points at projected future volumes of the graphical user interface and computer-to-computer interface.¹³

4. M&R Functionality and End-To-End Trouble Report Processing Evaluations (Tests 16, 17, 18, 18.7 and 18.8)

The tests that comprised the evaluation of M&R functionality collectively validated the performance of Qwest's M&R functionality as documented. These tests included an evaluation of the functional equivalence of Qwest's M&R processing for wholesale and retail trouble

⁷ *Id.*

⁸ *See id.* at 133.

⁹ *See id.* at 169.

¹⁰ *See id.* at 203.

¹¹ *See id.* at 233.

¹² *See id.* at 152.

reports.¹⁴ Additionally, these tests evaluated Qwest's performance in making repairs under various wholesale maintenance test scenarios.¹⁵ Finally, these tests included an evaluation of the end-to-end repair processes in Qwest's M&R work centers to ensure that they were effective and adhered to common support/help desk procedures.¹⁶

5. Billing Usage and Carrier Bill Functionality Test (Tests 19, 19.6, 20, 20.7 and 24.10)

These tests evaluated the accuracy and completeness of all usage record types on Qwest's DUF, in addition to the timeliness of DUF delivery.¹⁷ They evaluated Qwest's ability to accurately bill usage plus monthly recurring charges, and non-recurring charges on the appropriate type of bill.¹⁸ These tests also evaluated the timeliness of bill delivery to CLECs.¹⁹

6. CLEC Support Processes and Procedures Review (Tests 24.3, 24.4, 24.5, 24.6, 24.7, 24.8 and 24.9)

These tests evaluated the systems, processes, and documentation provided by Qwest for establishing and maintaining CLEC business relationships.²⁰ The test included a determination of whether Qwest is adequately assisting CLECs to understand how to implement and use all of the OSS functions available to them. The areas included in the evaluation were: (1) Account Establishment and Management; (2) CLEC Forecasting; (3) CLEC Training; (4) Interface Development; (5) OSS Interface (IMA) Help Desk Support; (6) Interconnect Service Center Support; (7) Account Maintenance Support Center (Repair); and (8) Network Surveillance and Outage Notification.

¹³ See *id.* at 252.

¹⁴ See *id.* at 386.

¹⁵ See *id.* at 346.

¹⁶ See *id.* at 356.

¹⁷ See *id.* at 407.

¹⁸ See *id.* at 435.

¹⁹ See *id.*

²⁰ See *id.* at 563.

7. Change Management Test (Test 23)

This evaluation determined the adequacy and completeness of Qwest's procedures for developing, documenting, publicizing, conducting, and monitoring change management.²¹

8. Performance Measure Audit

The objectives of the Performance Measure Audit were to:

- Validate that Qwest's measurement of performance is in the manner prescribed by the Performance Indicator Definition (PID) and is reliable,
- Compare and assess retail and wholesale operations processes in areas material to serving CLECs, and
- Verify that, where required, comparable wholesale and retail processes will by nature of their design and operation provide service at parity.

²¹ See *id.* at 508.