TI 827
OBSERVATION 3086 – SECOND SUPPLEMENTAL RESPONSE
Qwest OSS Evaluation

Initial Release Date: January 29, 2002
Second Supplemental Response Date: April 12, 2002

OBSERVATION REPORT

An observation has been identified during the POP Feature/Function Evaluation, Test 12.

Observation:

KPMG Consulting has identified a pattern in Qwest's Observation and Exception responses that refer to the need for additional training and/or training enhancements.

Background:

Qwest's responses to 75 Observations and Exceptions, raised by both KPMG Consulting and Hewlett-Packard Consulting (HPC), state that training initiatives and/or enhancements have been undertaken to remedy the issues raised. Of these 75 responses, 49 describe additional training measures that directly impact Interconnect Service Center (ISC) and Service Delivery Coordinator (SDC) personnel.

Issue:

As recently as January 2002, KPMG Consulting and HPC have identified issues in the POP Feature/Function Evaluation to which Qwest has responded by stating it would perform corrective actions in the form of additional training for the ISC and SDC to remedy the reported problems. However, as issues raised in "new" Observations and Exceptions continue to point to additional training needs for the SDC and ISC, KPMG Consulting believes that the adequacy of Qwest's ISC and SDC training programs may be insufficient. Below is a list of the Observations and Exceptions issued by KPMG Consulting and HPC for which Qwest stated ISC/ SDC training would occur.

Observations and Exceptions – SDC/ ISC

Exception #	Exception #	Exception #	Observation #
EXC 2006	EXC 2034	EXC 2073	OBS 2016
EXC 2010	EXC 2035	EXC 2075	OBS 2023
EXC 2013	EXC 2036	EXC 2081	OBS 2026
EXC 2017	EXC 2037	EXC 3020	OBS 2032
EXC 2019	EXC 2048	EXC 3061	OBS 2042
EXC 2024	EXC 2056	EXC 3078	OBS 2049
EXC 2026	EXC 2058	EXC 3101	OBS 2052
EXC 2027	EXC 2059		OBS 2053
EXC 2028	EXC 2063		OBS 2060

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Exception #	Exception #	Exception #	Observation #
EXC 2029	EXC 2067		OBS 2068
EXC 2030	EXC 2068		OBS 2072
EXC 2031	EXC 2069		OBS 3001
EXC 2032	EXC 2071		OBS 3020
EXC 2033	EXC 2072		OBS 3077

Impact:

The inadequacy of Qwest's ISC and SDC personnel training may impede a CLEC's ability to obtain consistent and effective assistance, thereby negatively impacting its ability to conduct business operations.

Qwest Formal Response:

Qwest has reviewed the 49 Observations and Exceptions that are cited as training opportunities for the ISC Service Delivery Coordinators (SDCs). Qwest disagrees with KPMG's assertion that these Observations and Exceptions reflect inadequacies in the training provided to ISC personnel.   Nor does Qwest agree that the frequency of training and quality assurance as a remedy in our Test Incident (TI) responses is indicative of a problem. As long as there are manual processes there will be some degree of error and, also, continuous opportunities for quality improvements.   The Third Party Test has presented ISC employees with a wide variety of uncommon products, infrequent activities and, as a consequence, significant opportunities for training and quality assurance. Qwest's goal is to provide sufficient training and quality assurance to maintain the target quality level of its ISC employees.

Nonetheless, Qwest understands KPMG's concerns and has prepared a response that is divided into three parts. First, this response describes the programs that are currently in place to provide Training and ongoing Quality Assurance for the ISC (These programs were also discussed in the Focus O/E call on January 17, 2002.) Qwest's responses to Observations and Exceptions have not always differentiated between Training and Quality Assurance, (including coaching and MCCs.) Likewise, in this Observation, KPMG has combined TIs where group training was provided with TIs where individual coaching was offered. An overall assessment of Qwest's training for ISC staff must consider both Training and Quality Assurance since each has a distinct role in maintaining the target quality level of the ISC staff.

Second, this response presents the results of Qwest's analysis of the Observations and Exceptions KPMG has referenced. Not surprisingly, this analysis shows a preponderance of process failures related to mistakes by individual SDCs. These mistakes warrant the kind of targeted, individualized intervention that is part of an ongoing quality assurance. The Test Incidents where Qwest indicated that training or quality assurance was provided

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as a remedy were associated with 324 orders submitted between 06/01 and 12/01, During that same period Qwest processed 4817 P-CLEC orders, which indicates that Qwest handled over 93% of all orders without the need to provide training or quality assurance. Qwest does not believe that it is unreasonable to provide training or quality assurance for less than 7% of all order activity. In fact, Qwest believes that the data demonstrates that, overall our training program provides a solid foundation for ISC personnel. Based on information shared by HP and KPMG during a Focus O/E call on 2/7/02, it is clear that the blindness requirement of the test makes it impossible for Qwest to know what the actual numbers are both for the number of orders in error and for total number of orders. Nonetheless, Qwest believes that the number of orders associated with Os and Es where Training or Quality Assurance is a remedy is relatively small. In addition, Qwest believes that their analysis of the Os and Es referred by KPMG reveals no underlying deficits in either its Training or its Quality Assurance program.

Third, in this response Qwest will document recent quality initiatives (both new measures and new interventions) initiated during the past six months, some of which have been undertaken as a result of concerns raised by these Observations and Exceptions. Ongoing quality initiatives are necessary because of the complex and dynamic environment in which SDCs work. SDCs in the ISC are responsible for processing orders that include many products and a variety of activity types. This is particularly true for the P-CLEC orders, which exercise a wider range of functionality than any of Qwest's commercial CLECs.

With regard to the specific confidential information, provided by KPMG Qwest has determined that seven of the forty-nine Observations and Exceptions are not pertinent to the discussion of ISC training. Details regarding these seven TIs are provided below.

Test	Source ID	Reason Not Included
12	E2063	No specific training identified. Job aides, PCAT, User Guide updated to reflect system fix. This should not be a part of the training TI list.
12	E2067	PCLEC received a reject in error because a database flag did not work correctly. The TI reference to MCC from 9/24 is only to state that the rep handled the order according to the MCC, not as a remedy. This should not be a part of the training TI list.
12	E2072	This TI is about gaps in the HiCap training Qwest provides to CLECs. As a result of the TI, there were documentation changes and a Communicator but no training of ISC employees. This should not be a part of the training TI list.

24	O2016	This TI describes "training issues" as contributing to the delay in PCLEC certification. Training, however, is not provided as a remedy for the Test Incident. "How to cancel orders' is addressed through the question log. No reference to coaching, group training, or MCC is made. This should not be a part of the training TI list.
24	O2023	This is a process update to the handling of non-fatal errors. The TI describes the importance of keeping training materials up to date. This should not be a part of the training TI list.
12	O2026	Like E2072, this TI documents shortfalls in the AVQ training that Qwest provides to CLECs. This should not be a part of the retraining TI list.
24	O2042	This is related to documentation and process updates for digital certificates. No reference to training, coaching or MCC. This is not related to retraining and should not be included in this list.

I. *Training and Quality Assurance Overview*

ISC Training Delivery

The Wholesale Training team has developed suggested training paths for the different job positions within Wholesale Service Delivery. For SDCs, these paths identify the basic training required for all SDCs and also provide specialized product or functional training by unique job description. The Courses, designed by the training team to meet measurable objectives for each role, combine self-paced, web-based delivery with trainer-led delivery.

Trainers are resident in ISC Centers, reporting into the central Training Delivery Manager to assure consistency between trainers and matrixed into center management to assure responsiveness to SDCs in individual centers. Eight of the nine Wholesale trainers are former Wholesale SDCs.   The trainers receive feedback from SDCs, Coaches and Center management regarding both the effectiveness of their courseware and their delivery.

Qwest's expectation is that initial, up-front training for SDCs will be followed with additional training prompted by system releases, process changes and/or product changes:

* For System releases, a course developer will develop the courseware for the Order Processing Centers, Help Desk and Call Center. Qwest uses a train- the-trainer model with trainers from the decentralized Training & Development team conducting the training in each center.

* For significant or complex Process changes trainers will receive their training from the process specialist and then conduct the training in the appropriate center(s). In addition, the initial training courseware will get updated with the most current information.

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- For significant Product changes and new Product introductions, trainers will receive training from the Product Management team Trainers then train the appropriate center(s).   Initial product training is then updated to reflect current product information.

ISC Quality Assurance and Continuous Improvement

In addition to the initial training that is provided, the center, as any operations organization, provides support structures for the employee and monitors performance to ensure quality service is provided and to identify opportunities for continuous improvement.   Training provides the foundation knowledge and skills for executing a particular role but all ISC employees need ongoing support and monitoring to assure that they meet the target objectives for their role. Results from monitoring lead to interventions, examples of which are presented later in this response.

Support for employees includes a number of resources.

- "Nesting": As new employees leave training, a "nesting" period is provided where the new employee is paired with an experienced employee until a level of confidence is achieved.

- Online Methods and Procedures: The SDCs can access online M & Ps in InfoBuddy to answer questions that arise during the course of their workday. New processes, products and system releases prompt changes to InfoBuddy to keep it current.

- Multi-Channel Communicator (MCC): The MCC is a tool that allows communication to be sent to broad audiences across the centers, as well as staff organizations. These communications can include new processes, process changes, or process reminders. Coaches routinely review MCCs in team meetings. Training courseware developers also review MCCs to ensure that, if necessary, their content is incorporated in course revisions.

- Management Team: Questions can be directed to members of the center management team. These managers will respond to questions and will work with the process organization as needed.

  II.   **The Forty-two Observations and Exceptions**

Characteristics of the Observations and Exceptions

KPMG and HP issued the Observations and Exceptions referenced in this Observation to Qwest over ten months, between April 4, 2001 and January 4, 2002. In order to evaluate

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our responses and, specifically, to determine if there is a persistent, troublesome pattern of retraining in particular areas, Qwest has categorized the Test Incidents raised by KPMG in the table below. Twenty-eight of the forty-two test incidents reveal process glitches. Nine of these twenty-eight have been characterized as "disorderly' orders and another twelve can be attributed to mistakes by individual SDCs.

Training Test Incident Classification		
Process	**28**	**66.7%**
SDC Process	12	28.6%
Disorderly	9	21.4%
HelpDesk	2	4.8%
ASR FOC	1	2.4%
Centrex21	1	2.4%
Dark Fiber	1	2.4%
Disconnect	1	2.4%
USOC	1	2.4%
Documentation	**4**	**9.5%**
HiCap	1	2.4%
ISDN/PRI	1	2.4%
NC/NCI Codes	1	2.4%
Process	1	2.4%
HelpDesk	**4**	**9.5%**
ISDN/PRI	2	4.8%
SDC Process	2	3.0%
SystemFix	**3**	**7.1%**
Add Edits	1	2.4%
Disorderly	1	2.4%
No SOC	1	2.4%
PIDs	**3**	**7.1%**
PO-5B	2	3.8%
PO-3B	1	2.4%

In reviewing the distribution of Observations and Exceptions over the ten month timeframe, Qwest finds, with two exceptions - an even distribution month to month of Os and Es among SDCs and among the categories in the classification. The two exceptions – which may be a function of the Third Party Test - occurred in July and December: nine of the ten "disorderly" orders were submitted in July and four of the six Help Desk problems (including two out of three ISDN/PRI orders) were submitted in November.
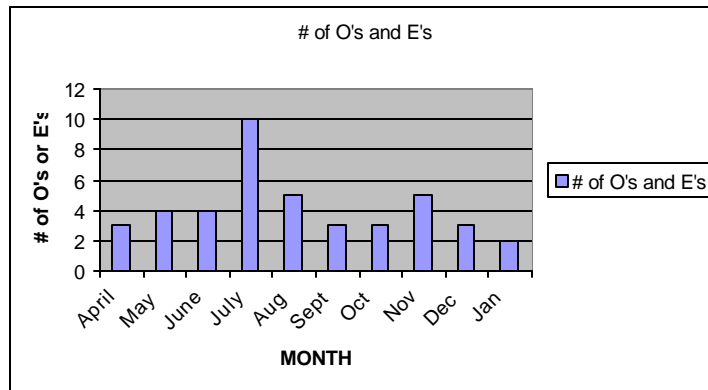
Characteristics of the Remedies

The remedies that Qwest implemented to respond to the issues raised by these TIs are
listed below. In the table below, the number is the number of TIs in the sample that had a
particular remedy; the % is the % of the 42 TIs that had a particular remedy.

Remedies			
MCC or Internal Communicator	27	64.3%	
Documentation Change	24	57.1%	
Process Change	22	52.4%	
Individual Coaching	20	47.6%	
Group Training	12	28.6%	
System Change	12	28.6%	
MCC Issued along with process and/or documentation being updated	18	66.7%	percentage out of total number of TI's that had MCCs issued
Training and Individual Coaching Occurred together	3	10.3%	percentage out of total number of TI's that had training or coaching

Which remedy is used depends on whether the problem is reoccurring or isolated, and whether fixing it involves changes to multiple components (systems <u>and</u> documentation; process <u>and</u> documentation) or, simply, re-emphasizing and re-explaining existing systems, documentation and processes.

- MCCs are the most common intervention – 27 of the 42 TIs prompted an MCC. If MCCs merely communicate information, like "don't forget to do something", training isn't involved.
- MCCs, documentation changes, and process changes are more common than either individual coaching or group training.
- Often, multiple remedies are implemented to resolve an Observation or Exception. Root cause analysis may prompt clarifying changes to application documentation and M & P documents as well as MCCs. (Reviewing the closed Observations and Exceptions that KPMG has associated to this Observation, Qwest finds that it is as common to provide two or three remedies as one.)
- Individual coaching is more common than group training.
- Group training is associated with apparently widespread error patterns ("disorderly" orders), system fixes, Help Desk problems and with new products (Dark Fiber, ISDN/PRI and HiCap.) Patterns of repeating errors prompt <u>re</u>-training, based on MCCs and existing training materials. System fixes require updated documentation and, if they are complex or unusual, may also require group training. New products require new training materials that describe the ordering and provisioning requirements.

Group Training as a Remedy		
Process	**7**	**16.7%**
Disorderly	4	9.5%
Dark Fiber	1	2.4%
HelpDesk	1	2.4%
SDC Process	1	2.4%
HelpDesk	**2**	**4.8%**
ISDN/PRI	1	2.4%
SDC Process	1	2.4%
Documentation	**1**	**2.4%**
HiCap	1	2.4%
SystemChange	**1**	**2.4%**
No SOC	1	2.4%
PIDs	**1**	**2.4%**
PO-3B	1	2.4%

System Changes

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Qwest continues to enhance its systems to provide additional safeguards to reduce or eliminate human error. As noted in responses to twelve of the O & Es referenced in this Observation, Qwest has implemented system changes that prevent the possibility of the same error occurring in the future. Of the 324 orders that were not processed correctly, system enhancements have already addressed the issues on 57 or 18.2% of that volume. With every release of its systems, Qwest identifies additional changes that will support process compliance.

III.   New Quality Initiatives

Starting in September, Qwest began additional measurement and monitoring activities to make sure that the benefits of training and coaching remedies are maintained over time and, also to proactively identify error trends that need to be addressed through coaching and re-training.

Performance Monitoring

The actual monitoring process varies based on the functional responsibility of the SDCs. In "Performing Trend Analysis" a document prepared for Team Leaders and Center Coaches in Sierra Vista and CSIE Centers in Minneapolis and Denver, Qwest describes how the results of monitoring are linked to corrective actions. For instance, the number of times an error occurs determines whether there will be an MCC, coaching or training. This document will be provided to KPMG through the Data Request process.

### ISC Help Desk: Sierra Vista Call Center

Sierra Vista is the initial point of contact for customers calling the help desk. The center handles calls regarding pre-order, order, service orders, order status and CSR inquiries. The Sierra Vista center uses call monitoring and ticket reviews to ensure quality. Beginning in late September, the center has been monitoring 50 calls per day and providing immediate feedback when the process is not correctly followed. See "Total Number of Tickets Sampled" below for a report on the effect of sampling at Sierra Vista between September and December.

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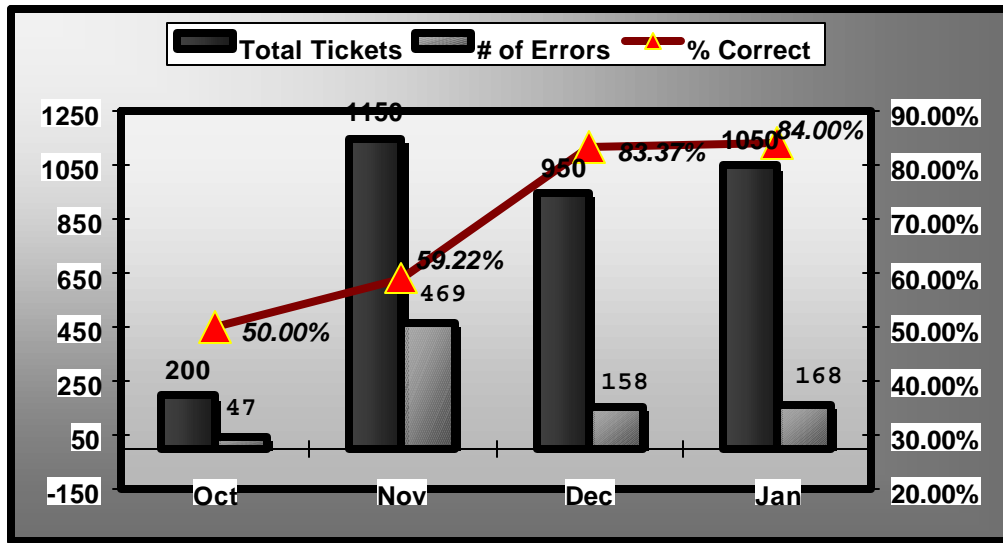
ISC Help Desk: Customer Service, Inquiry and Education (CSIE) centers

Customer requests are routed to the centers from the Sierra Vista Call Center. Since September these centers have also used call monitoring and ticket reviews to ensure quality.   Center coaches perform 5 observations per month on each of their SDC's customer calls. Center coaches also sample a minimum of 5 tickets per month per SDC. Feedback is provided to the SDCs on these reviews. The graph shows the results of CSIE ticket sampling.
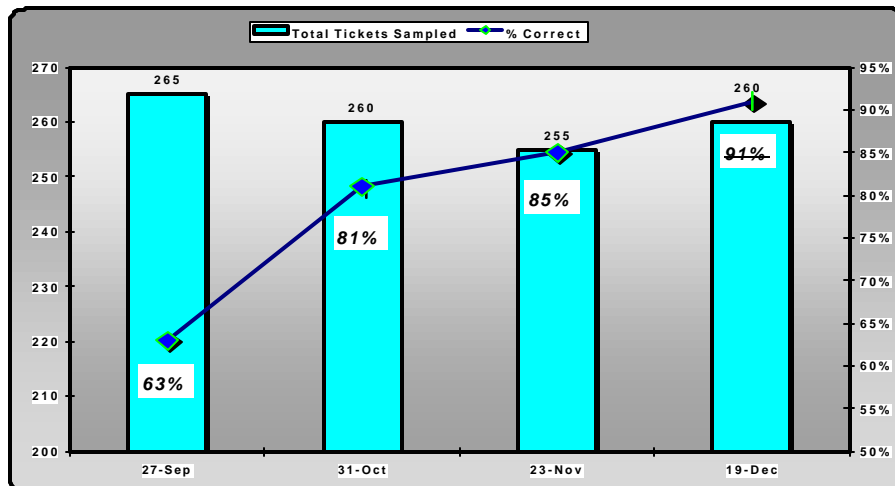
Since October the Denver Center has been providing targeted IMA phone training for CLECs with orders that fail flow-through. SDCs train CLECs about the correct way to

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complete orders. This initiative demonstrates a different approach to quality assurance. It has two benefits: it reinforces the SDC's own training and it reduces order errors. The content of the training is based on the volume and type of errors that Qwest receives from each CLEC.

ISC Order Typing Centers

In the typing centers, the coaches have been reviewing 10 orders per week/per representative focusing on a variety of issues, such as

- correct application date
- correct decision to reject or FOC, and
- accurate reflection of the services requested on the LSR.

Feedback is provided to the representatives as a result of these reviews.

In all of these centers, the coaches look for common errors that indicate a misunderstanding of the process. This information can then be shared across the centers and addressed in partnership with the process and training teams as appropriate.

<u>**Summary**</u>

In summary, Qwest acknowledges the number of Observations and Exceptions related to ISC processes in which training or quality assurance is part of the remedy. However, Qwest believes that the percent of error as measured against the number of orders processed does not support the conclusion that Qwest's training processes are inadequate. In fact, Qwest believes that its Training program, complemented by its Quality Assurance initiatives have demonstrated responsiveness to the Observations and Exceptions raised during the test. As KPMG stated in a call on January 17, 2002, human error is to be expected in manual processes. Qwest agrees and has taken and continues to take proactive steps to limit the volume of those errors.

Attachment(s): None

AT&T Comment:

In its remarks about the extent of manual processing that has brought about the Observations and Exceptions at issue in this Observation on the general subject of training and coaching, Qwest states: "The Test Incidents where Qwest indicated that training or quality assurance was provided as a remedy were associated with 324 orders submitted between 06/01 and 12/01, During that same period Qwest processed 4817 P-CLEC orders, which indicates that Qwest handled over 93% of all orders without the need to provide training or quality assurance. Qwest does not believe that it is unreasonable to provide training or quality assurance for less than 7% of all order activity."

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AT&T believes that the statistic calculated is incorrect. The fact that Qwest's response to the incidents involved 324 orders should consider the number of orders that were processed manually, or that while submitted electronically were subject to manual processing. The percentage of orders that are at issue here should be divided by the number of orders that were manually processed, and not total orders, many of which were untouched by Qwest personnel. If calculated appropriately, the need for training and quality coaching would be demonstrably larger, perhaps twice or three times the statistic that Qwest relies on to suggest a reasonable level of problem; its 7% number.
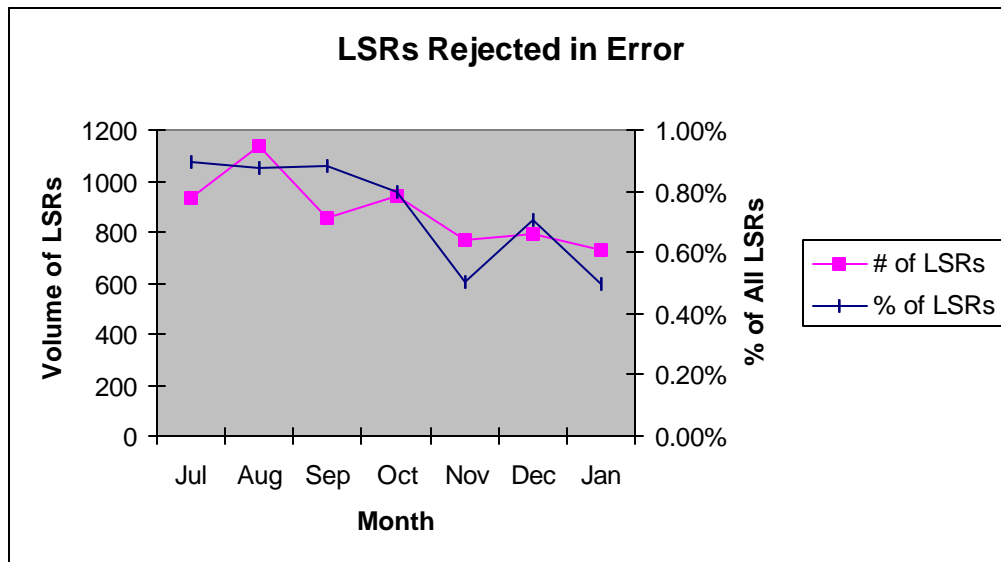
Qwest Supplemental Response (03/07/02):

Qwest has considered the feedback provided during the O&E call held last month as well as the input provided by the ROC Steering Committee. Specifically, the Steering Committee suggested that Qwest "identify ongoing reporting mechanisms that the Commissions and the CLEC community can use to identify and monitor the long term effectiveness of Qwest's overall effort to reduce the frequency of problems caused by human error." As a result, Qwest is willing to begin voluntary quality reporting to the state commissions in two areas. Qwest has reviewed its internal metrics and identified the following process measures that demonstrate the effectiveness and efficiency of manual handling of CLEC orders and inquiries by Qwest SDCs. Qwest's results on these measures will reflect the effectiveness of training and quality assurance for Qwest SDCs.

The first indicator will identify the percentage of accurate and complete Help Desk tickets created by Service Delivery Coordinators in the ISC Call Center. This information is gathered by analyzing a sample of completed Help Desk tickets each day to assure all required data is filled out and that it is consistent with the problem identified. The result will reflect the number of Help Desk tickets in the sample created without error divided by the total number of tickets analyzed each month. . The following chart, which was also provided in Qwest's initial response, provides historical detail for this indicator.

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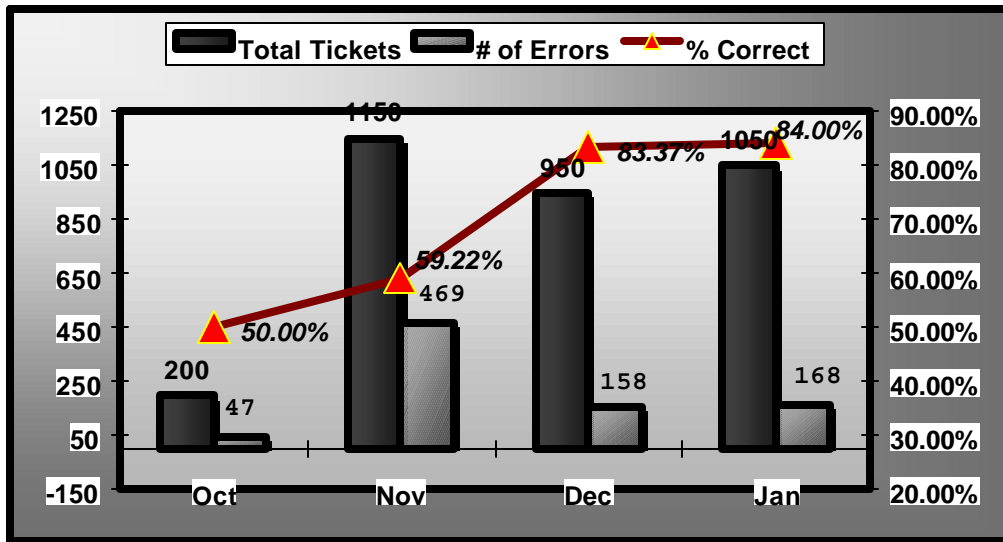
The second measure will identify the percentage of LSRs for which Qwest rejected the LSR in error and then subsequently provided an FOC. This measure addresses both flowthrough-eligible and non-flowthrough-eligible LSRs. The following chart provides historical detail for this measure.

Qwest will provide this data on a monthly basis to the individual state commissions upon request starting April 2002.

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In addition, on a quarterly basis, Qwest is willing to provide reports of internal reviews reflecting two areas of ordering quality. The first review will assess the accuracy of the due dates provided to the CLECs on FOCs and the due dates placed on the Qwest service orders. The second review will track the accuracy of reporting reasons for due date changes made to service orders. For designed services, the KIR ([K]Correction Issuance Reason) code will be validated; and, for orders following the non-designed flow, the missed appointment code will be reviewed,. Qwest will make this information available to individual state commissions upon request starting second quarter 2002.

Attachment(s): None

KPMG Consulting's First Response (03/21/02):

Training and Quality Assurance Overview

KPMG Consulting has reviewed Qwest's February 6, 2002 response to Observation 3086, and requests that Qwest provide the following documents:

- Measurable objectives for each role that are used to design training courses for ISC personnel.
- Examples of training feedback provided by SDC's, Coaches and Center Management to Trainers.
- Course outlines to be used in the development of additional training for systems releases, significant or complex process changes and significant product changes and new product introductions.
- Copies of relevant MCCs issued over the past four months.

In addition, KPMG Consulting requests that Qwest clarify the "nesting" process for new hires (i.e., what are the standard timeframes for the nesting period? How is the "level of confidence" measured?)

New Quality Initiatives

KPMG Consulting requests that Qwest provide the following information:

- A timeline which shows the date when each Quality Initiative described in Qwest's above response was implemented and/or modified;
- Examples of the data (and its supporting documentation) used to devise the graphical illustrations presented in Qwest's response;
- Organizational chart for training personnel and their responsibilities (center locations, products, etc.);
- Monthly quality statistics for the past four months;
- Ticket sampling statistics for the past four months;
- Quality check list;

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- Call monitoring form; and
- Procedural Investigation form.
- Examples of historical and recurring performance discrepancies derived from compiled reporting data;
- A detailed description and supporting documentation of the call/order writing review process; and
- An example of corrective action resulting from these reviews, and the correlating "remedy" based on the corrective action matrix.
- A description of the process in place to train and monitor the effectiveness of its coaches.

In addition to reviewing the requested documents, KPMG Consulting will perform additional interviews and observations to analyze the effectiveness of the training and related enhancement procedures employed by Qwest.

KPMG Consulting concludes that this Observation should remain open pending receipt and analysis of the above documentation requested from Qwest, and results of further interviews and observations.

KPMG Consulting's Second Supplemental Response (04/12/02):

KPMG Consulting has reviewed Qwest's analysis of seven of the forty-nine TIs cited in this Observation and finds that two, E2063 and O2042, were incorrectly identified as being pertinent to the issue of training. KPMG Consulting maintains that the following are relevant to this observation: E2067, E2072, O2016, O2023, O2026.

KPMG Consulting has conducted additional testing activities in order to verify and validate the components of Qwest's February 6, 2002, response related to Qwest processes and procedures for training, quality assurance and new quality initiatives. KPMG Consulting reviewed documentation provided by Qwest and conducted interview and observation sessions at the following Qwest Interconnect Service Center (ISC) locations: Denver, Minneapolis, Sierra Vista, AZ, and Phoenix. KPMG Consulting's findings are summarized below:

Training and Quality Assurance

Training

In its February 6 response, Qwest described its training delivery process. KPMG Consulting interviewed several members of the Wholesale Training Team and reviewed related training documentation provided by Qwest. Examples of the training paths provided by Qwest indicate that courses are in place for both Service Delivery

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Coordinators (SDCs) and their managers. Typical SDC training includes subjects such as general process overviews, training on the systems required for the SDC's role, and specialized procedural training such as complex order design.

KPMG Consulting also reviewed Qwest procedures for providing additional training for system releases and process or product changes. As an example, KPMG Consulting reviewed the training process used to train SDCs for the recent IMA 9.0 release. Course materials included detailed documentation of system changes and their impacts broken down by product and region.

Continuous Improvement

In its February 6 response, Qwest described several methods of support available to employees after initial training. KPMG Consulting interviewed supervisory staff at the ISCs and verified that the "nesting" process for new employees, the availability of online Method & Procedure documentation, and the Multi-Channel Communicator (MCC) dissemination process are in place at each ISC location.

New Quality Initiatives

KPMG Consulting has also reviewed the quality initiatives implemented since September 2001 and described by Qwest in its February 6 response.

Performance Monitoring

KPMG Consulting conducted interviews and documentation reviews to verify that the "Performing Trend Analysis" process described by Qwest has been implemented in the Sierra Vista, Denver and Minneapolis ISC locations.

KPMG Consulting reviewed a recent example of trend analysis at the Sierra Vista ISC. In this example, Qwest managers identified a recurring pattern of help desk tickets with incorrect call type, reason code, sub reason code, etc. The trend analysis indicated that corrective action was needed to provide guidelines for completing tickets. Based on the results of the trend analysis, an InfoBuddy document titled "Call Center Database Ticket – IMA" was created and distributed by the process team to describe new ticket procedures at the Sierra Vista call center. A notice announcing the availability of this document was distributed to the call center representatives via MCC. A trend analysis conducted after the creation of the "Call Center Database Ticket – IMA" document showed that the accuracy rate for help desk tickets increased from 65% to 74%.

ISC Help Desk: Sierra Vista Call Center

KPMG Consulting reviewed the call monitoring and ticket review processes in place at the Sierra Vista Call Center.

The center is equipped with facilities that allow QA representatives to actively monitor "live" calls and simultaneously view the computer screens of the representatives handling the calls. KPMG Consulting observed QA representatives monitoring calls and actively providing feedback and instructions to the call center representatives.

Process specialists in Denver perform the ticket review process for wholesale delivery and call handling. A sample of 50 tickets is reviewed daily for accuracy. Errors are tracked on the Sierra Vista Ticket Sampling Spreadsheet. Procedures are in place that require the Denver and Sierra Vista management teams to engage in daily conference calls to review results of ticket reviews.

ISC Help Desk: Customer Service, Inquiry and Education (CSIE) Centers

KPMG Consulting has reviewed the ticket review and call monitoring processes in place at the Denver and Minneapolis CSIE centers. At the Denver ISC, KPMG Consulting found that call tickets are reviewed using a 12-point checklist. Coaches are required to review a minimum of five tickets from each SDC each month. In addition, call monitoring is performed using a checklist of call handling procedures. Trend analysis to identify patterns in ticket discrepancies was implemented in January. Patterns are identified using reports collected from the Minneapolis and Sierra Vista locations as well.

At the Minneapolis ISC, KPMG Consulting verified that tickets are reviewed using the same 12-point checklist. One ticket for each SDC is pulled daily for review (five per SDC each week). The coaches include these results in a weekly trend analysis report that includes scores for individual and team performance. This report is submitted to the Process Specialist at the Denver ISC for use in trend analysis as described above.

KPMG Consulting also reviewed the process Qwest uses to provide targeted IMA phone training to CLECs. Qwest tracks CLEC order errors in a spreadsheet that is sent to the CLEC for review. The CLEC can then contact a Qwest representative to review order errors.

ISC Order Typing Centers

KPMG Consulting has also reviewed Qwest's order typing review and feedback process.

At the Minneapolis ISC, KPMG Consulting found that procedures are in place for reviews of all complex orders for accuracy using a 21-point quality assurance checklist. Coaches track orders using a report called the "Daily Status Check," which lists all orders submitted each day. The "Daily Status Check" is then used by the coaches to compile a

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weekly performance trend analysis. This analysis is used to determine whether any trends are present that may require corrective action.

At the Phoenix ISC, KPMG Consulting found that the order typing review and feedback process is conducted by volunteer Service Delivery Coordinators (SDCs) who are chosen based on a demonstrated knowledge of systems and a proven record of reliability. The SDCs review 10% of orders per day/per representative using a quality assurance checklist and provide feedback daily.

At the Sierra Vista location, KPMG Consulting found that dedicated QA representatives conduct the order typing review and feedback process. The QA representatives review three orders per week/per representative. For new order typists, 100% of orders are reviewed for accuracy until the typist has achieved at least 85% accuracy for four weeks. Order typists are given feedback in the form of monthly report cards.

Summary

KPMG Consulting has conducted interviews with Qwest training staff and ISC managers, on-site observations at several ISC locations, and reviewed supporting documentation to verify the training and quality assurance procedures described by Qwest are in place and are followed. KPMG Consulting finds that these procedures sufficiently address the concerns raised in this observation.

Qwest's March 7 Supplemental Response

KPMG Consulting did not review Qwest's proposed performance measures as part of the testing activities described above. At the request of the ROC TAG Steering Committee, KPMG Consulting will address the issue of performance measures for manual order processing in a separate document unrelated to this observation.

Based on the results of additional testing activities described above, KPMG Consulting recommends that this observation be closed.

KPMG Consulting