

Steering Committee Comments On Observation 3086

The Steering Committee shares the concern of the test vendors regarding the pattern of Qwest responses to test observation and exceptions that identifies a need for additional training or coaching and/or training enhancements. While some level of human error is to be expected, the steering committee believes the test has shown this to be a significant issue that deserves further attention. In addition to the observations and exceptions identified in this observation, the observations released by Liberty in response to the data reconciliation also identify human error concerns. (observations 1028, 1032, 1033, and 1034)

Steering Committee members recognize that the test has included products and procedures that are not frequently encountered in the current wholesale environment and that it is unreasonable to expect every Qwest representative to be fully aware of all the aspects of every product. However, the observations and exceptions to which Qwest has responded with additional training or coaching covers a wide variety of orders and products, including those commonly seen in the current wholesale environment. The Steering Committee believes that the test instances which led to these exceptions or observations were too frequent to be attributed to normal human error by a well trained staff. Steering Committee members believe the pattern revealed by the exceptions and observations on the test demonstrates a significant weakness in Qwest's overall wholesale systems and approach to supporting its wholesale customers.

Steering Committee members are concerned that this weakness will become more of an obstacle to a truly competitive market when the demands of the 271 process are no longer bringing the visibility of the test to these issues. Qwest has already announced significant staff reductions for the upcoming year and we expect the wholesale side of the Company will be subject to these reductions as well. This will only increase the importance of effective training and coaching of the remaining staff.

The Steering Committee acknowledges Qwest's initial response to this Observation, but as stated earlier, we find that response to be inadequate. The Steering Committee believes that Qwest response needs to include a plan for reducing the frequency of failures due to human error. Such a plan should consider significant changes to its training and coaching procedures, additional mechanization of processes, and a system of financial incentives for "error free" performance. In addition, the Steering Committee is concerned that human error is an area that may not be adequately addressed by the current performance reports provided by Qwest. Qwest's response to this Observation would ideally 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.