Report of the Audit of Changes Affecting OP-3 and OP-4 Application Date and Conditioned Loop Reporting

A.   Introduction and Background

Liberty audited two changes that Qwest recently made to the reporting of performance. The first was a change to properly set the application date on flow-through orders received after specific cut-off times. The second change involved the determination and reporting of conditioned loop provisioning commitments and intervals.

Application Date

Qwest made programming changes to more precisely account for the cut-off times for LSRs that are specified in the PID. The reason that a change was required was because orders may have been assigned an incorrect application date when they flowed through the ordering system without manual intervention. In cases where a flow-through order was received after the 3 PM and 7 PM cut-off times specified in the PID for designed and non-designed services, respectively, the application date was earlier than the case of a manually processed order and inconsistent with the PID. The effect of this situation was to calculate the provisioning interval incorrectly for some OP-4 orders.

To accomplish this change, Qwest had to acquire additional information from the Customer Records Management (CRM) system for use in calculating OP-4. This information included the date and time that the LSR was received and an indication of whether the order flowed through the ordering system without manual intervention. Qwest created new fields for RSOR that set a flag for incorporating the logic of which orders could be affected by the issue (e.g., flow-through unbundled loop orders received after 7 PM) and that set the interval for OP-4. The programming was complicated by the fact that certain types of orders (e.g., non-dispatched resale business) consider Saturday a business day while other types of orders do not.

The PID defines the application date and time as the date and time on which Qwest receives from the CLEC a complete and accurate local service request (LSR) or access service request (ASR) or retail order, except that for some orders the application date and time is the start of the next business day. These exceptions are:
- LSRs and ASRs received after 3:00 PM MT for Designed Services
- Retail orders received after 3:00 PM local time for Designed Services
- LSRs received after 7:00 PM MT for POTS Resale (Residence and Business), Non-Design Resale Centrex, non-designed UNE-P, and Unbundled Loops.

Conditioned Loop Reporting

Qwest first started reporting conditioned loops provisioning commitments met and intervals (OP-3 and OP-4) in September 2001. Liberty did not audit this additional product disaggregation reporting. Qwest's internal analysis of reported results indicated that too many orders were being reported as conditioned loops, and as a result, Qwest temporarily discontinued reporting this product in February 2002. Qwest found that in at least some parts of its region USOC codes for line conditioning activities were being assigned even if line conditioning may not have been required.

To correct this problem, Qwest's reporting systems were made to capture additional data and more specifically identify unbundled and line-share loops that required conditioning. Qwest then began reporting results for this product starting with the April 2002 results that included recalculated results for the period December 2001 through April 2002. Results reporting for conditioned loops affects only OP-3D, OP-3E, OP-4D, and OP-4E.

Qwest's capturing and processing of ordering information identifies conditioned loops in several ways. For example, if a line-share order, which presumably is on a working line, requires dispatch, the order is flagged as conditioning required. Also, information from a system called the Referral Tracking Tool (RTT) is used to identify specific activities associated with conditioning such as removal of bridge taps and load coils. Other identification mechanisms include the use of a jeopardy code that is specific to a local loop requiring conditioning and USOC codes for the non-recurring charges associated with the removal of bridge taps and load coils.

B.   Overall Summary

No exceptions or observations were identified during Liberty's audit of these changes to Qwest's performance measure reporting. The setting of the application date is consistent with the PID and conditioned loops are accurately reported.

C.   Analysis

Liberty's review of the application date and conditioned loop changes consisted of reviewing Qwest's responses to Liberty's data requests, interviews with Qwest's regulatory reporting and programming personnel, review of revised SAS code used to implement the changes, and analysis of data files containing records for the month of April 2002.

In reviewing the SAS code, Liberty brought two matters to Qwest's attention that may be improvements but are not necessary to correct problems. Liberty found one part of the RSOR code that may over-specify the unbundled loop orders subject to the 7 PM cutoff time. As written it correctly identifies these orders, but Liberty suggested that Qwest review the code to ensure that only necessary requirements were placed on the identification of these orders. Liberty also noted that Qwest's code may not function properly if two holidays were next to each other. This is not a current or likely problem.

In its review of the data files, Liberty replicated Qwest's reported results for conditioned loops for April in the Qwest region, and in the states of Colorado and Washington.

Liberty noted that both of these changes made Qwest's programming for collecting and processing data for reporting OP measures even more complex. New data sources, new fields, and new logic were added. Liberty did not find any errors or unintended interactions between the new and existing programming. However, Qwest should continue to monitor results and other clues for programming problems.

D.   Findings and Conclusions

1.   Performance Measure Release Date

Liberty completed its audit of the application data and conditioned loop changes on June 7, 2002.

2.   Exceptions and Observations

No exceptions or observations have been raised with respect to this audit.

3.   Conclusions

The changes discussed above have been properly implemented by Qwest.

4.   Recommendations

Liberty has no specific recommendation related to the scope of this audit. However, Liberty notes that the programming required to implement theses changes, as was the cased for the changes reflecting customer due date changes, made performance measure reporting more complex. Therefore, Qwest should continue to monitor and tests its results for problems that may become apparent in the future.