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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of those
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST Communications,
Inc.'s Statement of Generally Available Terms
Pursuant to Section 252(f) of the
Telecommunications Act of 1996

Docket No. UT-003040

**QWEST'S RESPONSE TO
AT&T AND WORLDCOM'S
COMMENTS ON PO-20**

Qwest Corporation ("Qwest") respectfully submits its response to *AT&T and WorldCom Inc.'s Comments on Qwest's Proposed PO-20 Measurement* dated August 28, 2002.

I INTRODUCTION

AT&T Communications of the Pacific Northwest, Inc. ("AT&T") and WorldCom, Inc. ("WorldCom") have failed to provide any basis for this Commission denying Qwest's request for incorporating PO-20 into the Performance Assurance Plan ("PAP"). Indeed, these CLECs' alleged concerns and accusations are inexplicable. The request to include Performance Indicator Definition ("PID") PO-20, Manual Service Order Accuracy, in the PAP resulted directly from an agreement with the Federal Communications Commission ("FCC") in the course of its review of Qwest's 271 application, rather than from any claimed attempt by Qwest to engage in "unilateral PID development" as the CLECs claim. Qwest is essentially offering to provide the states with additional payment

1 opportunities for a PID that was never requested by any CLEC in the course of PAP administration or
2 the Regional Oversight Committee (“ROC”) Operational Support System (“OSS”) test, and which
3 would not otherwise be considered for inclusion in the PAP until the first six-month review. As Qwest
4 stated in its initial pleading, the Commission’s acceptance of this filing does not preclude further
5 development through a collaborative or other process. AT&T and WorldCom have failed to identify any
6 impediment to the continued discussion of this measurement, including the ability to raise all the issues
7 covered by their pleadings, in both the long-term PID administration forum and at the six-month review, if
8 no consensus is reached through the collaborative effort. Qwest believes that the Commission may
9 approve PO-20 as filed without any prejudice to the CLECs and that the Commission does not need to
10 consider or decide any of the issues raised by AT&T and WorldCom’s comments at this time. However,
11 Qwest is providing at least an initial response for the benefit of the Commission’s understanding of the
12 PID in its current form.

13 II. DISCUSSION

14 PO-20 was developed in response to issues raised by KPMG in the course of the ROC OSS
15 test. Through test Exception 3120¹ and Observation 3110 and the “Qwest Manual Order Entry
16 Performance Indicator Description Adequacy Study,” KPMG suggested that service order accuracy was
17 an issue for further monitoring. Qwest committed to develop a PID to address identified concerns.
18 Therefore, the content and focus of the measurement Qwest developed and submitted to this Commission
19 is related to areas in which the testers perceived Qwest had issues that should be monitored. PO-20 was
20 intended to be diagnostic and only for informational purposes until further discussions in the long-term
21 PID administration or in a six-month review. However, in the course of the FCC’s review of Qwest’s
22 section 271 applications, Qwest committed to place the PID in the PAP for the states in which Qwest
23 had filed applications.

24 ¹ Incorporating test Observations 3089 and 3099.

1 **A. Products and Fields**

2 Contrary to AT&T and WorldCom’s assertions, the structure and focus of PO-20 is sound.
3 PO-20 measures the percentage of manually processed service orders for UNE-P POTs, resale POTS
4 and unbundled loops that are populated correctly in specified date and address related fields. These
5 products and fields were developed as a direct response to the above-referenced exception and
6 observation, which identified only issues involving dates and intervals. The filed proposal also reflects
7 consideration of the PID adequacy study conducted by KPMG, which recommended additional
8 measurements. The fact that this PID does not contain all the areas measured by similar Verizon and
9 Southwestern Bell measurements is no basis for rejecting it. PO-20 appropriately focuses on areas of
10 perceived vulnerability. Any discussion of adding additional performance criteria areas can be discussed
11 in the long term PID collaborative. Indeed, the PID itself refers to additional development through
12 “phases” including any necessary expansion of fields through long-term PID administration in a “Future
13 Phase.”

14 **B. Comparison to Service Orders vs. CSRs.**

15 Contrary to AT&T and WorldCom’s suggestion, it would not be appropriate to structure the
16 measurement to compare Local Service Requests (“LSRs”) to post-provisioning Customer Service
17 Records (“CSRs”). PO-20 employs the same comparison of LSR to service order as does similar
18 Verizon, Bell South and Southwestern Bell measurements. This structure is appropriate in light of the
19 PID’s purpose to determine whether Qwest has accurately processed the LSR by comparing specific
20 LSR entries to the resultant service order(s). AT&T and WorldCom’s argument that using the post-
21 provisioning CSR rather than the service order seems to be based on a misunderstanding of when the
22 comparison occurs.² Further, AT&T and WorldCom’s proposal does not achieve the appropriate
23 comparison in all instances. The CSR is account specific, not order specific. Should multiple requests be

24 ² AT&T and WorldCom claim “...Qwest’s proposal compares what was ordered with what *should be* installed.”
25 (Emphasis added). In fact, PO-20 compares the LSR to the completed service order after the provisioning work has
26 been finished. This completed service order is exactly what is sent to the billing systems to commence billing and to
create the basis for the post-provisioning CSR.

1 issued against the same account, the CSR would not readily isolate which CSR changes were associated
2 with which service order.³ Finally, the CLECs' ability to perform their own analyses and verification of
3 PID calculations has never been a consideration in the development of a PID and is not a valid reason for
4 comparing LSRs to CSRs. As with all other measurements, CLECs can obtain data from Qwest with
5 which to verify their individual results, and PIDs are subject to future auditing opportunities.

6 **C. "Operational" Aspects of the PID**

7 Certainly, AT&T and WorldCom's interest in having additional information on how Qwest
8 "operationalizes" the PID should not be a basis for denying Qwest's request. The PID itself identifies
9 what is included for measurement and when a service order is counted as accurate. The random selection
10 process is as follows: Qwest selects completed orders for products identified by the PID. These orders
11 are compared to CRM data to ensure that all orders are those that were manually handled. A code
12 applies a selection function in SAS that randomly selects orders from each state. This information, as well
13 as how the "non-fatal errors" exclusion is applied, will be documented in Qwest's business process
14 documentation. Further information of this type can be discussed if necessary in detail in the long-term
15 PID administrative forum. Moreover, this kind of information is always reviewed in audits, to which all
16 PAP-related PIDs are subject, going forward.

17 **D. Penalty and Benchmark**

18 AT&T and WorldCom's complaints about the penalty amounts and benchmarks for PO-20 are
19 unfounded as well. AT&T and WorldCom's contention that PO-20 Tier 2 payment levels are too low is
20 based on their claim that the Verizon New Jersey performance plan has payment levels for its metric that
21 exceed the payment levels proposed by Qwest. Further, AT&T and WorldCom claim that Qwest
22 payment levels do not synch up with the payment levels for the other region-wide measures (i.e., GA-
23 1,2,3,4, and 6; PO-1; OP-2; and MR-2).

24 In regard to the higher payment level for the New Jersey Verizon order accuracy metric, Qwest

25 ³ In order to isolate which service order drove which CSR change would require a review of the completed service
26 order; the very source Qwest currently uses.

1 would point out that the Verizon performance plans are distinctly different from the Qwest plan and that
2 the New Jersey performance plan is unique among Verizon states. Because the Verizon and Qwest plans
3 are structured very differently, they should not be compared by looking only at one provision. And in any
4 event, most of Verizon's other states have adopted a very different performance plan penalty provision
5 applicable to the same type of performance measurement that averages the measurement with a number
6 of like measures to determine if any payments for a particular category of performance and service will be
7 made to CLECs. Importantly, the effective payment level for these metrics in the other Verizon plans
8 would be considerably smaller than the New Jersey plan.

9 Regarding the claim that Qwest's proposed payment levels do not synch up with its other region-
10 wide measures' payment levels, Qwest would point out that the PO-20 metric is disaggregated into two
11 product categories (i.e., Resale POTS/UNE-POTS, Unbundled loops (Analog and Non-Loaded 2-
12 Wire)) creating two distinct payment opportunities, whereas the other regional measures have no such
13 disaggregation and provide for only one payment opportunity. It is important to note that if the payment
14 levels for the two PO-20 product disaggregations are summed together they equal the same overall
15 payment level as that for the PO-1, OP-2, and MR-2 metrics.⁴

16 AT&T and WorldCom's proposal for a 98% benchmark is based solely on how "easy" they
17 think it is to accurately populate fields specified in PO-20. They make their broad-brushed suggestions
18 without providing any basis for objectively deciding which fields are easy and which are hard and, and
19 more importantly, what relevance or impact any such classification has on ordering accuracy and on what
20 constitutes reasonable performance.

21 In response, Qwest's proposal makes no pretence about fields being easy or hard, and no claim
22 that PO-20 covers every possible accuracy issue. Instead, Qwest's proposal specifies order fields that
23 cover, first, order aspects that are the most important, based on performance dimensions raised as issues

24 ⁴ It is important to remember that the Qwest proposed PO-20 payment levels that AT&T and WorldCom cite are
25 only for one state. Because this is a region-wide measure, the exact same payments would be made to all states based
26 on the 14 state payment levels in right-hand column in Table 5 of the proposed PAP.

1 in the ROC OSS test, and, second, other fields related to identifying the customer.⁵ Qwest's proposed
2 benchmark of 95% is consistent with what other ILECs have used.

3 As to the accuracy dimensions raised in the OSS test that PO-20 addresses, these were limited
4 only to fields affecting the intervals provided/measured and the commitments met. The OSS test raised
5 no other order accuracy-related performance issues. As to the other fields sampled in PO-20, some are
6 such that an error might be customer-affecting and the others are not, thus having varying levels of
7 importance or relevance. Nevertheless, each and every field sampled presents the opportunity for an
8 order to be counted as an error in PO-20, because it only takes one error in one field to count the order
9 as being in error. In this context, 95% is clearly reasonable as a benchmark. This would be true even if
10 the only fields sampled were those considered to have the highest importance or whether other fields
11 were also included.

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21 III. CONCLUSION

22 In light of the positive benefits to CLECs and the states and the ability of CLECs to seek further
23 modification through a collaborative process or at the six-month review, it is appropriate to approve
24 Qwest's request.

25 ⁵ All in the context that Qwest has also provided results for OP-5, which measures installation accuracy, and
26 additional information covering what OP-5 does not capture, which CLECs reported to Qwest's Service Delivery
Centers (such as service or features that were left off the order or not installed).

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QWEST CORPORATION

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