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2001 OCT 25 A 11: 12

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IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	**Docket No. T-00000A-97-0238** **WORLDCOM'S QUESTIONS CONCERNING CAPACITY TEST REPORT**

WorldCom, Inc., on behalf its regulated subsidiaries, (collectively "WorldCom") submits the attached questions on the Capacity Test Report. These questions were previously submitted to all parties by e-mail on October 17, 2001. In addition, there was an un-numbered question between questions 73 and 74. That question was numbered by CGE&Y as question "73A".

Dated: October 24, 2001

WORLDCOM, INC.

By: _____

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Arizona Corporation Commission
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Qwest 271 OSS Test Workshop Questions

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Question Number	Submitter (Company)	Interim Report (e.g. Retail Parity, Rel Mgmt,etc.)	Report Section Reference	Question (one per row)
1.	WCom	Capacity	4.1.1	However, the Capacity Sub-committee, at the recommendation of CGE&Y, made a decision to reverse the order of testing and begin with the 12-month test, thereby only performing the 9-month test should Qwest's systems fail to meet performance benchmarks given the 12-month volume. WCom Question: Why did CGE&Y recommend the test begin with the 12-month test? Was there any information obtained from Qwest that would have lead CGE&Y to make such a recommendation?
2.	WCom	Capacity	4.1.1	Those systems that support a specific region were tested with the volumes anticipated only for that region. (For regional systems only the Central region data were evaluated). Those systems, that only support Arizona, were tested with Arizona volumes. WCom Question: What is meant by the statement "for regional systems only the central region data were evaluated"? What systems supported 14 volumes, what systems supported regional volumes and what systems only supported Arizona?
3.	WCom	Capacity	4.1.2	Therefore, an agreement was reached between the parties that only PO-1 and PO-5 would be evaluated as part of the Capacity Test and this evaluation made no finding on Qwest's ability to handle volumes of LSRs that fell to manual processing.[1]

[1] LSRs that triggered rejections that could be handled in a mechanized environment and LSRs that fell to the manual-handling queue were included in the test.

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				WCom Question: According to Qwest PIDs version 6.3, the purpose of PO-2 Electronic Flow-Through was to "monitor the extent Qwest's processing of Local Service Requests (LSRs) is completely electronic, focusing on the degree that electronically-submitted LSRs flow directly to the service order processor without human intervention or manual retyping". Thus, please explain further the rational behind excluding PO-2 as a means to validate the capacity test results?
4.	WCom	Capacity	4.1.2	In addition to evaluating whether Qwest meets the above benchmark for the PO-1 measure to determine success, CGE&Y will also analyze IRTM results as compared to results calculated using Pseudo-CLEC collected data to determine if these simulated transactions are an accurate representation of the CLEC's actual pre-order response time. WCom Question: How does the PCLEC load generated accurately track transaction response times?
5.	WCom	Capacity	4.1.2	The final number was determined by reviewing Qwest-provided historical data and forecasts to arrive at an educated estimate of CLEC volumes one year from the execution date of the Capacity Test. WCom Question: What forecast criterion was imposed on the historical data to arrive at the educated estimate of CLEC volumes one year from the execution date of the Capacity Test?

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6.	WCom	Capacity	4.1.2	The Capacity Test orders were cancelled following receipt of the FOC or notification that the order had fallen out for manual processing. WCom Question: What are the procedures Qwest uses to notify CLECs of orders that fall out for manual processing?
7.	WCom	Capacity	4.1.2	Any Capacity Test orders that fell into the manual intervention queue were also cancelled and were not to be processed by Qwest's Interconnection Service Centers (ISCs WCom Question: How would the Qwest ISCs know that an order that fell into the manual intervention queue was a result of the AZ Capacity Test?
8.	WCom	Capacity	4.1.2	These dates are the maximum due dates that Qwest's business rules will allow for an LSR to flow through without special handling thereby not effecting normal processing of the order. WCom Question: Did CGE&Y review Qwest business rules to validate the maximum due dates for an LSR to flow through without special handling?
9.	WCom	Capacity	4.1.2	Finally, Qwest will provide CGE&Y with performance measurement data pertaining to the Capacity Test for PO-1 (IRTM), PO-2 and PO-5 along with a list of orders that fell out for manual intervention. WCom Question: Did Qwest in fact provide performance

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				measurement data pertaining to the Capacity Test for PO-1 (IRTM), PO-2 and PO-5 along with a list of orders that fell out for manual intervention? If so, what were the results?
10.	WCom	Capacity	4.1.2	Qwest will also provide system information, such as CPU, memory and disk utilization and the paging rate. WCom Question: Did Qwest in fact provide system information, such as CPU, memory and disk utilization and the paging rate? If so, how was CGE&Y assured that the data would be accurate?
11.	WCom	Capacity	4.1.3	All supporting documentation for this area of the Capacity Test may be found on a CD ROM located in CGE&Y's viewing room. WCom Question: In summary, what will the supporting documentation obtained from the CD ROM located in CGE&Y's viewing room provide regarding "this area" of the Capacity Test?
12.	WCom	Capacity	4.1.3	Phase 1 was performed with volumes that represented the forecast 12 months from the start of the System Capacity Test. WCom Question: What methodology was used to generate the final 12 month forecast? All that we know from this report is that historical data was utilized as a starting point.
13.	WCom	Capacity	4.1.3	These transactions were developed by Qwest after the MTP and TSD

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				were approved and were not included in the System Capacity Test. The volumes associated with these transactions were added to the Facility Availability transactions. WCom Question: Please clarify. Does this mean that historical volumes associated with these transactions were added to the Facility Availability historical data and then the forecast methodology was applied or something else? How did CGE&Y validate the volumes were added?
14.	WCom	Capacity	4.1.3	The CLECs pointed out that the CFA pre-order transaction became available with IMA Release 6.0. The CFA transaction currently represents about 3.0% of the pre-order transactions. The CFA transaction is different from most other pre-order transactions in that it accesses the TIRKs database to retrieve the requested information. WCom Question: When was IMA Release 6.0 implemented?
15.	WCom	Capacity	4.1.3	Since the purpose of the Capacity Test is to test the ability of Qwest systems to handle transaction volumes and does not test the functionality of the transactions, the CFA transaction could be accounted for by increasing the FAQ transaction volumes an amount equivalent to the projected CFA volumes. WCom Question: Would the Capacity Test have been delayed by including CFA transactions? If so, what would that impact have been?

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16.	WCom	Capacity	4.1.3	The total number of pre-order queries planned for each phase of the Capacity Test were as follows:

Phase	Total	EDI	GUI
Phase 1 (12 month)	20,083	17,071	3,012
Phase 2 (9 month)	10,443	8,877	1,566
Phase 2 (9 month)	7,000	5,950	1,050
Phase 4*(Stress)	8,422	7,159	1,263

*Phase 4 volumes are dependent upon which previous phase of the test is successful. The above numbers represent the volumes that would be used if Phase 1 of the test is successful.

WCom Question: How were the pre-order query volumes derived? If Qwest provided the predicted pre-order queries, how did CGE&Y validate this information?

17.	WCom	Capacity	4.1.3	The formulae for determining how many pre-order queries are associated with each order type is defined in the SCTDP 2.02, Section 5.2.1, Table 5.2.1-1 (see Appendix F of this document). WCom Question: These sections lack the details surrounding how the pre-order query volumes were derived.

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18.	WCom	Capacity	4.1.3	This formula suggests that the number of pre-order transactions performed that do not result in the creation of an LSR is directly proportional to the total number of LSRs submitted. WCom Question: How did CGE&Y validate the formula provided by Qwest?
19.	WCom	Capacity	4.1.3	➢ The test consisted of LSRs that were eligible to flow through to the Qwest Service Order Processors (SOPs). However, LSRs that were expected to cause mechanized error rejects, and flow-through LSRs that fell to manual processing, were also included in the test. These errors were included to add a volume of simulated LSR errors to the test to simulate a production environment. WCom Question: How did CGE&Y validate that all flow-through eligible LSRs were included in the Capacity Test?
20.	WCom	Capacity	4.1.3	➢ Non flow-through eligible LSR types were not included in the test. However, the forecasted volumes for these LSRs were applied to flow-through eligible LSR volumes. WCom Question: Please clarify. How were LSR volumes of non flow-through eligible LSRs applied?
21.	WCom	Capacity	4.1.3	➢ The Pseudo-CLEC load generator created the order volume, mix, and arrival rates as defined by CGE&Y.

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				WCom Question: Did CGE&Y validate the load generator created the order volume, mix, and arrival rates were implemented as defined by CGE&Y?
22.	WCom	Capacity	4.1.3	See Table 4.1.3.a above for a break down of planned order transaction mix for the 12-month Capacity Test. WCom Question: For each product type, how were the forecasted volumes generated?
23.	WCom	Capacity	4.1.3	➢ Intentional error conditions that resulted in rejects in Qwest's IMA-GUI and EDI interfaces. Although a failed transaction requires no manual work for purposes of this test, ordinarily expected occurrences of error/reject messages have been integrated into the test process to simulate actual production environment. WCom Question: How did CGE&Y derive the appropriate error conditions to simulate actual production environment?
24.	WCom	Capacity	4.1.3	➢ Replications of transactions created by the load generator by the Pseudo-CLEC in order to attain the required number of transactions. Qwest relaxed edits to allow duplicate LSRs to be created against the same test accounts for the purpose of the Capacity Test. Without this capability, execution of the test would have required a unique account for each LSR to be issued during the test. Allowing the replication of transactions had no effect on the operation or validity of the test.

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				WCom Question: What edits did Qwest relax for purposes of the Capacity Test? How did CGE&Y verify that by allowing the replication of transactions there was no effect on the operation or validity of the test?
25.	WCom	Capacity	4.1.3	The first hour of the stress test was executed using the baseline volume. WCom Question: Please clarify. Is the baseline volume truly the derived 12 month forecast?
26.	WCom	Capacity	4.1.3	IRTM Telephone Number (TN) transaction volumes remained constant at the full stress level for the duration of the stress test WCom Question: Why were IRTM (simulated) TN transaction volumes used vs. actual transaction volumes for the Capacity Stress Test? How did IRTM telephone number (TN) transaction volumes remain constant at the full stress level for the duration of the stress test? How did CGE&Y validate these volumes remained constant at the full stress level for the duration of the stress test?
27.	WCom	Capacity	4.1.3.1	a) All incidents observed during the preparation or execution of the test were documented using the Incident Work Order (IWO) Process as described in Appendix I of the TSD 2.10.

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				WCom Question: What issues were identified and how did Qwest address those issues?
28.	WCom	Capacity	4.1.3.1	b) CGE&Y validated that the test scripts were completed in the prescribed manner and that all results were recorded. WCom Question: How did CGE&Y validate the test scripts were completed in the prescribed manner?
29.	WCom	Capacity	4.1.3.1	c) Following the receipt of the FOC (or rejection notice) Qwest cancelled the orders. The cancellation process was performed during non-business hours in order not to adversely affect Qwest's systems. The cancellation of these orders had no impact on the test. WCom Question: How was Qwest notified to cancel the orders?
30.	WCom	Capacity	4.1.3.1	d) CGE&Y obtained IRTM results from Qwest for the day of the Capacity and Stress Test to compare with results calculated for PO-1 from the Pseudo-CLEC data. An analysis was performed to determine if IRTM accurately reflects actual pre-order response time. WCom Question: How did Qwest capture the IRTM results for the day of the Capacity and Stress tests and did CGE&Y validate the raw data?
31.	WCom	Capacity	4.1.3.1	Five ORTs were performed to verify that all of the components of the System Capacity Test were in place and

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				working in a sufficient manner to enable the test to proceed. WCom Question: How many ORTs were planned to verify that all the components of the System Capacity Test were in place?
32.	WCom	Capacity	4.1.3	♦ Since the IMA gateway is a regional gateway, test volumes were needed to simulate forecasted CLEC volumes for all fourteen states within the Qwest region. WCom Question: Isn't IMA truly the up-front edit requirements (BPL) Qwest places on wholesale orders which are applied equally throughout the region, yet pre-order queries and order transactions go beyond IMA to back-end production databases?
33.	WCom	Capacity	4.1.3	In preparation for the ORT, Qwest provided CGE&Y with test accounts to be used for the test. These accounts were pseudo customers in all fourteen states. These accounts included: ➢ Retail accounts ➢ Resale accounts ➢ UNE-L accounts ➢ UNE-P accounts

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				WCom Question: per state, how many test accounts did Qwest provide?
34.	WCom	Capacity	4.1.3	♦ Qwest created pseudo connecting facilities and pseudo addresses for the test in order for the LSRs to flow through without manual intervention. WCom Question: How would Psuedo connecting facilities and Psuedo addresses provide for LSRs to flow-through without manual intervention?
35.	WCom	Capacity	4.1.3	♦ CGE&Y verified the pseudo accounts by performing Address Validations, CSR queries, and CFA queries for the appropriate accounts. All discrepancies were reported to Qwest for resolution. WCom Question: What discrepancies were identified? How were the discrepancies reported to Qwest and what action was required to rectify the discrepancies?
36.	WCom	Capacity	4.1.3	• Incorrect test scripts created by CGE&Y • Incorrect templates created by the Pseudo-CLEC • Incorrect test bed setup by Qwest • Inconsistent reporting of times (e.g., minutes and seconds reported by Qwest, seconds reported by Pseudo-CLEC) WCom Question: What was the record counts per ORT for each

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				of these identified issues? What test bed setup issues were identified since validation of account information was done prior to execution? Did CGE&Y execute every planned Capacity and Stress test LSR during each ORT performed?
37.	WCom	Capacity	4.1.3	The June 25th ORT failed due to a Qwest system change made to accommodate a test in progress in another jurisdiction. This system change caused the LSRs issued in the Arizona ORT to automatically complete, prior to cancellation. Once this was brought to the attention of Qwest, Qwest reset their accounts and another ORT was run in order to verify the Qwest fix. WCom Question: How were orders automatically completed if due dates were extended out a minimum of 36 business days?
38.	WCom	Capacity	4.1.3	The July 16th ORT contained errors, many of which were related to the June ORT. WCom Question: What errors resulted from the July 16th ORT and why were they not resolved from the June ORT
39.	WCom	Capacity	4.1.3	These errors were left in the test to account for the "Planned" errors for the 12-Month Capacity Test and the stress test; therefore, no further ORTs were required for system

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				verification. WCom Question: Why did CGE&Y not follow the intent of the ORTs, which stated "ORTs were performed to verify that all of the components of the System Capacity Test were in place and working in a sufficient manner to enable the test to proceed"?
40.	WCom	Capacity	4.1.3	The System Capacity Test was first attempted on July 26, 2001. While the test appeared to run successfully, an analysis of the data indicated the Pseudo-CLEC EDI CSR template was incorrect. WCom Question: 1) Per section 7.4 of the System Capacity Test Detailed Plan, "The System Capacity Test shall not be executed until at least three weeks after the start of the Operational Readiness Test." Please explain why this directive was not followed? 2) What was incorrect about the PCLEC EDI CSR template that would cause problems with the data analysis?
41.	WCom	Capacity	4.1.3	The System Capacity Test was next attempted on August 2, 2001. At about 12:30 p.m. CGE&Y aborted the test when it became apparent that the transactions response times were extremely slow. Analysis of the problem by Qwest indicated that the "Code Red" virus had struck. It was reported that the

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				problem prevented the messages from the gateways to be forwarded to the system support personnel. CGE&Y issued AWIWO1993. WCom Question: Again, the directive of section 7.4 SCTDP was followed, please explain why?
42.	WCom	Capacity	4.1.3	The System Capacity Test was performed on August 10, 2001. CGE&Y monitored the test from the Qwest Data Center in Salt Lake City, Utah and the Pseudo-CLEC location in Tempe, Arizona. The test commenced at 7:00 a.m. MST and concluded at 6:00 p.m. MST. WCom Question: Was blindness ever compromised given all the required ORTs?
43.	WCom	Capacity	4.1.3	CGE&Y increased the initial numbers to take into account planned errors and to adjust the load to account for increased demand given the time delay in executing the test. WCom Question: What methodology did CGE&Y use to adjust the pre-order transactions necessary to execute during the System Capacity Test?
44.	WCom	Capacity	4.1.3	. Failed transactions are those that received error messages as

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				opposed to a valid response. WCom Question: Were any of the failed errors processed correctly during the ORTs?
45.	WCom	Capacity	4.1.3	Of the 18,328 EDI transactions entered, 311 EDI transactions resulted in an error message. These were the planned errors mentioned previously in order to simulate actual production environment. WCom Question: Are these the errors that were generated during the last ORT run that CGE&Y chose to not correct prior to execution of the System Capacity Test?
46.	WCom	Capacity	4.1.3	Under the "Pseudo-CLEC Results" column, the time interval under "IRTM Result Part a" was provided to CGE&Y by Qwest since the Pseudo-CLEC software does not have the ability to measure the time for the screen to become available once requested. WCom Question: Why was the PCLEC unable to capture this data if the data was sought to be necessary for validating the pre-order response times? In other words, could the PCLEC have developed the capability to capture this information?
47.	WCom	Capacity	4.1.3	As displayed in the table, the results for each query category were within the PID measurement benchmarks regardless of whether using the IRTM or Pseudo-CLEC data.

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				WCom Question: To clarify, the measurements are within the PID benchmarks prior to applying any exclusions, correct?
48.	WCom	Capacity	4.1.3	There were a total of 4,915 orders processed during the 12-month System Capacity Test consisting of 698 orders submitted through the GUI interface and 4,217 orders submitted through EDI. Of these orders that were processed, there were 3,756 EDI and 637 GUI for a total of 4,393 orders that received a FOC. WCom Question: What was the state breakdown of these orders that successfully generated FOCs?
49.	WCom	Capacity	4.1.3	There were 234 LSRs that ended up as rejects, all of which were planned to reject. WCom Question: What was the state breakdown of these rejects?
50.	WCom	Capacity	4.1.3	A total of 281 LSRs fell to manual intervention of which CGE&Y had expected 79 of these orders to FOC. WCom Question: Of the 281 orders that fell to manual handling, how many successfully were executed during the ORTs?

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51.	WCom	Capacity	4.1.3	Qwest made a configuration change in Fetch-N Stuff to enable Fetch-N Stuff to read all transactions. WCom Question: How did CGE&Y validate this fix?
52.	WCom	Capacity	4.1.3	The other two orders that did not FOC also fell to manual intervention but according to Qwest these orders did not fall out due to Fetch-N Stuff. One was due to a formatting error on the part of the Pseudo-CLEC and the other was given a duplicate order number. WCom Question: To verify, does this statement indicate that no further action was taken by CGE&Y to address the identified issues?
53.	WCom	Capacity	4.1.3	Qwest confirmed that the seven LSRs did not receive a FOC but encountered an error in the Business Processing Layer (BPL) process that was generated due to the increased volume on the system. WCom Question: Did these 7 orders successfully process during the ORTs?
54.	WCom	Capacity	4.1.3	Since this issue arose due to increased volumes being placed on these systems, of which normally would have increased

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				gradually over a period of months giving Qwest an opportunity to scale its systems, and the impact is minimal, seven LSRs affected out of almost 5000 issued, CGE&Y determined not to re-do the Capacity Test. WCom Question: What corrective action was validated by CGE&Y to conclude these errors would not occur in the future given volume increases?
55.	WCom	Capacity	4.1.3	Another issue that arose while evaluating the data produced by the System Capacity Test revealed that data was missing from the status file generated by the Pseudo-CLEC. WCom Question: What data was missing from the status file generated by the PCLEC and how did this affect CGE&Y evaluation of the data?
56.	WCom	Capacity	4.1.3	Further research indicated that the Qwest Interactive Agent (IA) generated duplicate file names. It appeared at some point, the IA started reusing file names causing the new files to overwrite previously generated files. CGE&Y issued AZIWO3009 to document the finding and in response, Qwest agreed that duplicate file names were in fact generated and overwriting previous files; however, Qwest disagreed that the problem was with its IA.

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				WCom Question: What leads CGE&Y to believe the issue was a direct result of Qwest IA?
57.	WCom	Capacity	4.1.3	Qwest's response indicated that the problem is due to the design of the UNIX operating system on which Qwest's IA is running on the Pseudo-CLEC side of the interface. The limitation is not the fault of Qwest's IA or of the Pseudo-CLEC but is due simply to how that version of UNIX is designed. Any CLEC, BOC or other company in any other industry would encounter this same limitation in their applications (whether it was an IA or other application that relied These two reasons alone make it highly unlikely that the 17,576 limitation would ever be encountered under normal operations. WCom Question: What evidence did CGE&Y review of the documented issue of AZIWO3009 that lead to the conclusion that this would not occur during normal operations? on naming files) if it used a version of UNIX that had this limitation. WCom Question: How did CGE&Y validate this assertion?
58.	WCom	Capacity	4.1.3	PO-5 results indicate that 100% of the LSRs issued that

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					received a FOC met the 20-minute benchmark. One LSR received a FOC in 21+ minutes, but this LSR was handled manually and therefore excluded from the results as per TSD 2.10 (see Appendix D, 12-Month Test PO-5 Results). WCom Question: Did the affected LSR successfully process during the ORTs? What caused the LSR to drop to manual handling during the System Capacity Test?
59.	WCom	Capacity	4.1.3		CGE&Y increased the initial numbers to take into account planned errors and to adjust the load to account for increased demand given the time delay in execution of the test. WCom Question: What methodology was used by CGE&Y to adjust the load?
60.	WCom	Capacity	4.1.3		The average response time for the GUI pre-order transactions was within the benchmarks per PID 6.3 regardless of whether you look at IRTM or Pseudo-CLEC generated results. In fact, IRTM results are within plus or minus two seconds of the Pseudo-CLEC results for each transaction except GET CSR, where IRTM response times are almost twice as long as those experienced by the Pseudo-CLEC. However, any differences detected between IRTM and Pseudo-CLEC is immaterial given that no transaction results, IRTM or Pseudo-CLEC

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				come any where close to exceeding the agreed to benchmarks. WCom Question: Were the ORT results similar to the System Capacity and Stress test results? If not, please describe the discrepancies?
61.	WCom	Capacity	4.1.3	Therefore, in order to make an adequate comparison of results achieved through testing to IRTM response times, any transaction exceeding 200 seconds should be excluded as per PID 6.3 for the IRTM measure. WCom Question: Why did CGE&Y ignore the evidence provided that reflected a real CLEC would experience excessive response times under stress conditions?
62.	WCom	Capacity	4.1.3	In addition, Qwest states in the response to AZIWO2119 that during the third hour of the stress test IRTM encountered an outage unrelated to the stress test. WCom Question: Did CGE&Y validate Qwest assertion that an outage occurred?
63.	WCom	Capacity	4.1.3	The results of the stress tend to reflect that pre-order response times begin to suffer once volumes reach those achieved

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				during the third hour of the stress test. WCom Question: Doesn't the evidence gathered during the Stress Test prove deterioration was experienced during the third hour of the stress test for the PCLEC?
64.	WCom	Capacity	4.1.3	The difference between the number of orders planned and that actually executed is to take into account the additional load that would have been experienced from the date the test was planned to run and the actual date of the test. WCom Question: What methodology was utilized by CGE&Y to adjust the load?
65.	WCom	Capacity	4.1.3	There were a total of 3,121 orders processed which consisted of 435 orders submitted through the GUI interface and 2,686 orders submitted through EDI. Of these orders that were processed, there were 2,347 EDI and 380 GUI for a total of 2,727 orders which received a FOC. There were 193 LSRs that ended up as rejects, all of which were planned to reject. WCom Question: Did these rejects process successfully during the ORTs?

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				difference in results in calculating PO-1B using stress test generated data. WCom Question: To verify, of the responses that exceeded 200 seconds, responses were in fact eventually received, correct?
69.	WCom	Capacity	4.1.3	That point appears to be somewhere between 150% and 220% of the peak hour load. WCom Question: Did the evidence not prove that deterioration was seen between 150 and 220 % of the peak hour load was applied?
70.	WCom	Capacity	4.1.3	This load would never be realized in a production environment because Qwest's interfaces are scaled to support volumes on a minimal six month rolling basis. Qwest adds hardware and software as these increased volumes begin to materialize. The relevance of this test is to determine that Qwest has sufficient capacity to support current load and that forecasted far enough in the future to allow time to ramp up. WCom Question: What evidence brought CGE&Y to make these conclusion statements?

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66.	WCom	Capacity	4.1.3	A total of 201 LSRs fell to manual intervention of which three of these were inadvertently processed and received a FOC but the results have been excluded from the calculation of PO-5 as per the requirements of the TSD. WCom Question: What of the 201 that fell out for manual handling were successfully processed during the ORTs? Why did the three LSRs that fell to manual handling that inadvertently processed and received a FOC not generate an IWO?
67.	WCom	Capacity	4.1.3	➢ During the third hour of the test, the EDI gateway experienced slow response times that failed to meet the PID benchmark. (see AZIWO2119) ➢ IRTM results for EDI response times were significantly different than the results calculated by using data collected by the Pseudo-CLEC (see AZIWO2119). WCom Question: What action has Qwest taken to address the deficiencies identified in AZIWO2119 and what has CGE&Y done to validate the assertions made by Qwest?
68.	WCom	Capacity	4.1.3	The inclusion of these time intervals in part explains the

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71.	WCom	Capacity	4.1.3	For purposes of comparing IRTM to actual CLEC response time results, the two must be calculated the same. In other words, since IRTM excludes response intervals greater than 200 seconds, CGE&Y's calculated results using Pseudo-CLEC data must also exclude these transaction times. WCom Question: Why did CGE&Y ignore the requirement to use "actual CLEC pre-order response times will be gathered during the capacity portion of the OSS test and these results will be used to make the final determination of whether IRTM is a true representation of the response times experienced by the CLEC service representatives"? Why did CGE&Y ignore the evidence provided that reflected a real CLEC would experience excessive response times under stress conditions?
72.	WCom	Capacity	4.1.3	Once this exclusion is applied, the EDI results obtained from the stress test are similar to those obtained from the 12-month Capacity Test. WCom Question: If a true comparison could not be made due to an IRTM outage, why was the Stress test re-run?
73.	WCom	Capacity	4.2	Qwest recognized this area for improvement and implemented a team of Information Technology (IT) professionals to reengineer this process. Now, Qwest's OSS computer growth and mainframe

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				planning is conducted by a central team which has lead to improved coordination of hardware changes and a reduction of unnecessary expenses. WCom Question: When did Qwest recognize this area for improvement and when was this team put in place?
73A	WCom	Capacity	4.2	Where feasible, CGE&Y made observations to ensure Qwest's current operations were capable to implement the scalability procedures described within the documentation. WCom Question: Where was it feasible for CGE&Y to make observations to ensure Qwest's current operations were capable to implement the scalability procedures described within the documentation?
74.	WCom	Capacity	4.2	At the time of the scalability evaluation Qwest did implement periodic walk-throughs to ensure anything that has changed is updated such as contacts, software, infrastructure, etc. However, as was determined during the second attempt of performing the Capacity Test CGE&Y discovered that Qwest does not conduct actual disaster recovery tests to verify their procedures. AZIWO1193 was issued in response to this observation. WCom Question: What is the status of this IWO and how does CGE&Y plan to validate Qwest resolution?
75.	WCom	Capacity	4.2	• Procedures for tracking OSS loads and capacities are in place, actively being utilized and sufficient to detect unexpected increases in volume in order to react

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				appropriately. WCom Question: How did CGE&Y validate that procedures for tracking OSS loads and capacities are in place, actively being utilized and sufficient to detect unexpected increases in volume in order to react appropriately?
76.	WCom	Capacity	4.2	• Procedures for forecasting future OSS loads are within industry standards for planning purposes and are adequately maintained and followed by Qwest's systems staff. WCom Question: What industry standards were used to make this conclusion statement?
77.	WCom	Capacity	4.2	• Processes are in place and actively followed for managing and providing the necessary CPU, memory and data storage requirements for Qwest's OSS computer growth. WCom Question: How did CGE&Y validate the above Processes?
78.	WCom	Capacity	4.2	• Qwest has adequate procedures in place to facilitate its staff in executing OSS interface data security processes. WCom Question: How did CGE&Y validate the above procedures?

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79.	WCom	Capacity	4.3	There is no evidence provided that Qwest monitors call center response times for CLEC support functions in order to determine whether adequate staffing exists to handle calls in a timely fashion and handle CLEC information requirements. This has been documented in AZIWO1194. WCom Question: How has Qwest addressed the issues identified in this IWO?
80.	WCom	Capacity	4.3.4	❑ Sufficient CLEC support centers workforce development modeling procedure documentation is available. WCom Question: Did CGE&Y witness the procedures being executed or followed?
81.	WCom	Capacity	4.3.4	❑ In-place volume contingency plans to meet dramatic increases in CLEC order volumes through either re-routing work to supporting ISC offices or outsource to a vendor are documented and available to Qwest staff and are sufficient to cover the daily work load. WCom Question: Why would it be necessary for Qwest to outsource for support if they have adequate procedures in house to staff and train?
82.	WCom	Capacity	4.3.4	❑ Disaster recovery plans are well defined to assure continued operations are in place and maintained.

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				WCom Question: What evidence was provided that lead CGE&Y to conclude "disaster recovery plans are well defined to assure continued operations are in place and maintained?
83.	WCom	Capacity	4.3.4	❑ Recruiting and training programs to provide for the availability of competent staff with the necessary skills to adequately process CLEC orders are sufficiently documented. WCom Question: Why did CGE&Y conclude that these documented programs are sufficient? How did CGE&Y validate these documented programs are adhered to?
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CERTIFICATE OF SERVICE

ORIGINAL and ten (10)
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overnight mail to be filed this 24th
day of October, 2001, with:

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