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1 **LEWIS**
2 **AND**
3 **ROCA**
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5 **LAWYERS**

6 **BEFORE THE ARIZONA CORPORATION COMMISSION**

7 **WILLIAM A. MUNDELL**
8 **Chairman**

9 **JAMES M. IRVIN**
10 **Commissioner**

11 **MARC SPITZER**
12 **Commissioner**

Arizona Corporation Commission
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13)
14) **IN THE MATTER OF U S WEST**
15) **COMMUNICATIONS, INC.'S**
16) **COMPLIANCE WITH § 271 OF THE**
17) **TELECOMMUNICATIONS ACT OF 1996**
18)

Docket No. T-00000A-97-0238

19 **RESPONSE OF WORLDCOM, INC. TO CGE&Y'S**
20 **DATA RECONCILIATION REPORT FOR THE FUNCTIONALITY TEST**

21 WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits the
22 following comments and questions found in the attached Data Reconciliation Report for
23 the Functionality Test Results, Draft Version 2.1 dated December 3, 2001. WorldCom's
24 comments and questions are highlighted in bold text that is also underlined.
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RESPECTFULLY submitted this 10th day of December, 2001.

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Arizona 271 Test



Data Reconciliation Report for the Functionality Test Results

December 3, 2001
Draft Version 2.1
Prepared For:

Arizona Corporation Commission

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Document Control Sheet

Version	Date	Reason
1.0	11/13/01	Draft Version 1.0 distributed to the TAG for review - includes sections on SOCs and Gateway Availability.
2.0	11/15/01	Draft Version 2.0 for internal review adding new sections on M&R, FOCs, Jeopardies, Billing and Rejects.
2.1	12/3/01	Draft Version 2.1 with updates from current IWO resolutions from Qwest.

Draft Version 2.1

This Interim Report may be used only as authorized by the Commission. This Interim Report is subject to further revision by CGE&Y and shall not be deemed final until CGE&Y issues its Final Report in this proceeding and that Final Report is released by the Commission.

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1. Data Reconciliation Report

Introduction

In accordance with the Master Test Plan (MTP) and Test Standards Document (TSD), Cap Gemini Ernst and Young (CGE&Y) based the evaluation of performance measures included in Section 2.5 of the Functionality Report, on results calculated using adhoc data files provided by Qwest. During the Functionality Test, the Pseudo-CLEC collected test data detailing transactions associated with the pre-ordering, ordering, provisioning, maintenance and repair (M&R), and billing of products and services.

The processes and findings of the reconciliation of these two data sources are presented herein.

The data files supporting this report are contained on a Highly Confidential CD available from CGE&Y

Purpose

The data reconciliation effort evaluated the extent to which the data captured in Qwest's adhoc data files, and used to calculate §271 performance measurement results, accurately reflected the test transactions executed and the performance observed by the Pseudo-CLEC.

WCom Comment: What is missing from this report is an understanding of how Qwest created its ad hoc data files. As well, it needs to be understood how did CGE&Y validate the steps required to produce the ad hoc data files.

Summary of Findings

The following findings are subject to change pending the response to the open IWOs and Data Requests:

- ◆ Service Order Completion (SOC) – CGE&Y finds that 1669 out of 1673 (99.76%) Pseudo-CLEC received SOCs were included in Qwest's Regional Service Order Repository (RSOR) adhoc data. However, 20 out of 1669 (1.2%) orders were misidentified as Qwest Retail or commercial CLEC orders. CGE&Y issued AZIWO1200 to resolve these discrepancies. Conversely, the Pseudo-CLEC received SOCs for 1649 out of the 1659 (99.4%) Pseudo-CLEC classified completions in RSOR.

WCom Comment: The functionality report states that 1567 order transactions were processed. If the report is accurate, does Qwest support multiple SOCs per LSR? If not, how were more SOCs received than LSRs submitted?

- ◆ Firm Order Confirmation (FOC) – CGE&Y finds that 95.4% of valid FOCs received by the Pseudo-CLEC were included in CRM and 97.0% of valid FOC issuances included in

CRM were received by the Pseudo-CLEC. CGE&Y issued IWOs 1202, 1203, 1204, 1205 to resolve outstanding discrepancies between the Qwest adhoc CRM data and Pseudo-CLEC captured FOCs.

WCom Comment: Of real concern is the lack of audit controls in place by Owest to ensure ad hoc data files reflect accurate information. According to the IWO responses from Owest, although orders may be issued electronically with an expectation by the CLEC of an electronic response, FOCs are generated by Owest via Fax, Email, GUI and EDI. Electronically submitted orders associated with manually submitted responses only provides for a greater risk of error not only in reporting of the performance measures but CLECs ability to track order history.

- ◆ Jeopardies – CGE&Y finds that 3 of the 14 jeopardies on completed orders that were received by the Pseudo-CLEC were not contained in the Qwest adhoc jeopardy data. Moreover, the Pseudo-CLEC did not receive jeopardy notification for 6 out of the 15 jeopardies on completed order contained in the Qwest adhoc jeopardy data. CGE&Y issued AZIWO1199 and AZIWO1039, respectively, to resolve these outstanding discrepancies between the Qwest .

WCom Comment: Of real concern is the lack of audit controls in place by Owest to ensure ad hoc data files reflect accurate information. This concern stems from the lack of established procedures for jeopardy notifications and Owest's ability to capture the different means of processing jeopardy notifications.

- ◆ Rejects – CGE&Y finds that Qwest failed to provide 7 out of 299 manual reject notifications associated with the functionality test. CGE&Y issued AZIWO1210 on this subject. Since an early problem with providing status update indicators was resolved, CGE&Y finds that the numbers of auto-rejects received by the Pseudo-CLEC and the number of auto-rejects contained in Qwest adhoc CRM data are similar.

WCom Comment: CGE&Y's concluded that the "numbers of auto-rejects received by the PCLEC and the number of auto-rejects contained in Owest ad hoc CRM data are similar". In doing so, CGE&Y fails to reconcile 100% the discrepancies identified.

- ◆ M & R – For troubles on non-designed services, 16 out of the 86 troubles (18.6%) in the Pseudo-CLEC data were not included in the Qwest MTAS adhoc data. This discrepancy is the subject of AZIWO1207. In addition, four troubles in the Pseudo-CLEC data were in MTAS but were designated as Qwest retail troubles. CGE&Y finds that 16 out of 86 troubles (18.6%) contained in MTAS were not in the Pseudo-CLEC data. For troubles on designed services, CGE&Y finds that 2 of the 20 troubles (10%) in the Pseudo-CLEC data were legitimately not included in the Qwest WFAC data due to pending disconnect orders. All 18 designed service troubles in Qwest adhoc WFAC data were also found in the Pseudo-CLEC data.

WCom Comment: CGE&Y highlights missing and misclassified data that surrounds the type of service ordered. Owest must establish audit and control procedures that eliminate these types of errors. In doing so, Regulators and CLECs can be assured the data reported accurately reflects performance provided by Owest.

- ◆ Gateway Availability – Based on further research by Qwest, CGE&Y finds that Qwest did capture in 6 of the 7 Pseudo-CLEC outages as IT initiated Problem Management Records. Of these, 3 would be classified as GA-1 outages under the current PID definition, but were not under the definition in effect in January through June 2001. The Pseudo-CLEC did not experience any outages for the IMA-Electronic Data Interchange (EDI) system.

WCom Comment: A conclusion statement is missing here. Is it CGE&Y position that Owest Gateway Availability measure accurately reflects performance received by the PCLEC? If so, what evidence was provided by Owest that allowed for such a conclusion?

- ◆ Billing – CGE&Y was unable to perform a full reconciliation of Qwest adhoc billing data as Pseudo-CLEC did not receive 11 electronic CRIS bills. CGE&Y issued AZIWO1211 on this subject. CGE&Y finds that Qwest correctly reported adjustments to Pseudo-CLEC bills during the Functionality Test. CGE&Y finds that Qwest is not accurately reporting late orders for inclusion in BI-4A. CGE&Y issued AZIWO1214 on this subject.

WCom Comment: A full reconciliation of Owest ad hoc billing data must be performed in order to validate that Owest billing reports accurately reflects performance provided. CRIS bills not generated by Owest does not remove the need to validate billing performance measures.

2. Test Processes and Findings

This section describes the processes used to conduct the data reconciliation, and the reconciliation findings. The scope of this evaluation was to reconcile:

- All notifiers provided by Qwest (i.e., FOCs, SOC, Rejects, and Jeopardies);
- M&R transactions based on status update e-mails provided by Qwest to the Pseudo-CLEC;
- Qwest adhoc billing data to information received through the electronic bill provided to the Pseudo-CLEC; and
- Gateway availability based on outages experienced by the Pseudo-CLEC during the Functionality Test compared to those reported by Qwest during the same time period.

2.1 Service Order Completions

2.1.1 Introduction

The reconciliation of completion notifications validated whether Qwest provided the Pseudo-CLEC with a SOC for each completion record in Qwest's RSOR ad hoc data file. In addition, the reconciliation effort validated whether all completed Pseudo-CLEC service orders for which notification was received from Qwest were included as completions in RSOR for §271 measurement processing.

WCom Comment: What is missing from this report is an understanding of how Qwest created its RSOR ad hoc data file, used as a means for CGE&Y to validate performance. As well, it needs to be understood how did CGE&Y validate the steps required to produce the RSOR ad hoc data file.

2.1.2 Process

In order to compare reported service order completions, data sets were constructed¹ detailing completions during the Functionality Test period for both Qwest and the Pseudo-CLEC. Qwest RSOR data files for December 2000 through August 2001 were combined to provide a complete detail of all Qwest recorded service order completions during the Functionality Test period. Records were then restricted to Pseudo-CLEC completions for comparison purposes. Pseudo-CLEC captured functionality data for all transactions were assembled to construct a table of all SOCs received during the Functionality Test period.

For each data set, all completions not associated with the Functionality Test were removed to perform this evaluation. This included completions associated with the Retail Parity Evaluation and staging orders. Reconciled completions were further restricted to only those orders which were submitted on or after December 21, 2000 (the beginning of the Functionality Test) and before July 1, 2001 (the end of the Functionality test).

Where possible, the matching of records in each data set was made on the service order number. In cases where the Pseudo-CLEC data did not contain a service order number, matching was made possible by using other common fields in the two data sets, e.g., PON and SOMTN.

WCom Comment: It is assumed in these paragraphs that CGE&Y constructed the data sets detailing completions during the functionality test period for both Qwest and the PCLEC. If this is an accurate statement, it is necessary to understand the steps necessary to construct these data sets...where did the information come from?

¹ CGE&Y Archive File: Data Reconciliation Report #1 – RSOR Completions and Pseudo-CLEC SOCs.

If from Qwest, how was it validated by CGE&Y as accurate? If from CGE&Y, what audit procedures were implemented to eliminate record errors? Example step would be the process CGE&Y employed to remove completions not associated with the Functionality Test.

2.1.3 Results

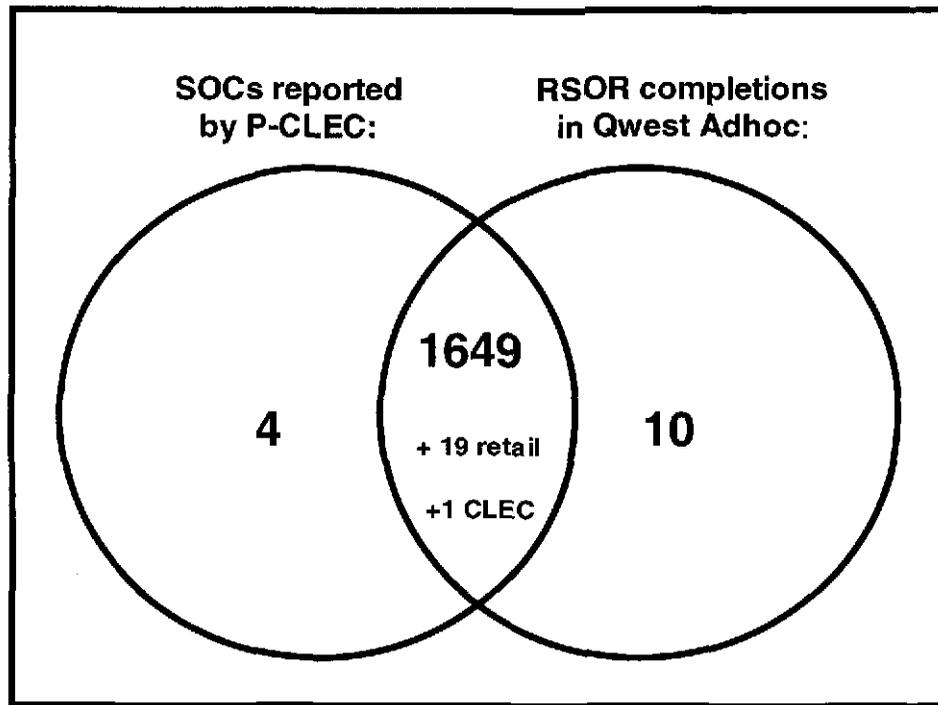
The removal of service order completions for orders not associated with or not submitted during the Functionality Test reduced the number of Qwest reported completions in RSOR to 1,659 Pseudo-CLEC completions; the removal of SOC for orders not associated with or not submitted during the Functionality Test, SOC cancels, and duplicate SOC from the Pseudo-CLEC data reduced the number of Pseudo-CLEC received SOC to 1,677.

Initially, there were 1,647 SOC that were identified in both RSOR and Pseudo-CLEC data. This constitutes 99 percent of the completions reported in RSOR and 98 percent of the SOC received by the Pseudo-CLEC. However, of the 1,677 SOC received by the Pseudo-CLEC, 30 were not represented in Qwest RSOR data. These 30 orders were the subject of AZIWO1200. CGE&Y accepted Qwest's response that 6 of these 30 orders were cancelled and would not be included in RSOR. The removal of these 6 orders from consideration lowered the Pseudo-CLEC received SOC total to 1671. CGE&Y disagreed with Qwest's classification of 1 completion as cancelled. This status of this order is still outstanding as part of AZIWO1200. CGE&Y has also requested further information regarding 1 order that Qwest has classified as "pending." In its response to AZIWO1200, Qwest stated that 20 of these completions were in fact included in RSOR. However, the RSOR records for 19 of these completions were misidentified as Qwest Retail orders and the remaining completion was misidentified as another commercial CLEC order. The misclassification of these orders is still outstanding as part of AZIWO1200. CGE&Y has provided Qwest additional information for 2 orders for further research.

Of the 1,659 completions reported in RSOR, 12 were not included in the Pseudo-CLEC data. Of these, 2 orders were disconnects associated with new installations for unbundled products, but the Pseudo-CLEC did not receive a SOC for the 2 orders; they are, however, accurately reported in RSOR. The issue of Qwest not sending SOC was discussed in AZIWO1045. The 10 remaining orders were the subject of AZIWO1201. CGE&Y accepted Qwest's response to AZIWO1201 that the Pseudo-CLEC would not receive SOC for 5 of these orders. CGE&Y also agreed with Qwest that SOC notifications were received for 2 of the 10 completions. These completions were for orders with the same PON as previously matched completions. Due to the nature of the Pseudo-CLEC data recording, in some cases the Pseudo-CLEC recorded simultaneous SOC on different order numbers for the same PON only once.

The inclusion of these additional completions raises the number of Pseudo-CLEC received SOC's to 1673. CGE&Y accepted Qwest's explanation that due to a manual error one completion notice was sent for the wrong order number, and due to there being only 1 occurrence of this type of error, CGE&Y is satisfied that no problem systemic issue exists. Finally, in the case of 1 RSOR completion, CGE&Y does not agree with Qwest's contention that the Pseudo-CLEC received a SOC. However, since there is only one discrepancy for over 1600 SOC's during the Functionality Test, CGE&Y finds that this discrepancy be ignored and AZIWO1201 closed.

The final results for the reconciliation of RSOR and Pseudo-CLEC captured data are summarized in the following diagram:



As explained above, for the 4 unmatched Pseudo-CLEC received SOC's, Qwest has classified 1 as cancelled, 1 as pending, and is performing additional research for the remaining 2. For the 10 unmatched completions included in RSOR, 2 were Pseudo-CLEC disconnects for which a SOC was not received, 6 were completions for which the Pseudo-CLEC would not receive a SOC, 1 SOC was not received due to a manual error, and for the remaining SOC, CGE&Y disagrees with Qwest contention that it was sent to the Pseudo-CLEC. With the exception of the misidentification of Pseudo-CLEC completions, CGE&Y finds a high level of agreement between Pseudo-CLEC SOC data and Qwest's adhoc RSOR data.

WCom Comment: CGE&Y concludes that a high level of agreement exists between PCLEC SOC data and Qwest's adhoc RSOR data but neglects to provide sufficient evidence that the data supplied by Qwest was accurate. As well, CGE&Y neglects to provide sufficient details surrounding how the PCLEC data was captured with audit controls in place to ensure accuracy.

2.2 Firm Order Confirmations

2.2.1 Introduction

The FOC data reconciliation compared FOCs provided by Qwest to the Pseudo-CLEC with Qwest's adhoc Customer Record Manager (CRM) table to determine whether: (1) notifications were provided to the Pseudo-CLEC for all Local Service Request (LSR)-related transmissions which Qwest considers to be issuance of a FOC, and (2) FOC notifications provided by Qwest to the Pseudo-CLEC were included as FOC issuances in Qwest's data processing for §271 measurement reporting.

WCom Comment: The Qwest supplied ad hoc data source described above is referred to as a CRM table, yet in CGE&Y's introduction all files were described as data files. WCom believes there is a distinct difference between data files, data tables and/or database provided ad hoc information. The means for which Qwest developed these records must be validated and not taken at face value as accurate. In doing so, a critical validation step was missed during the data reconciliation process.

2.2.2 Process

Qwest's adhoc CRM files for each month from December 2000 through August 2001 were combined and restricted to Pseudo-CLEC-generated Functionality Test orders with a status of "Issued FOC" received since the Functionality Test began. FOCs received by the Pseudo-CLEC and transmitted to CGE&Y were similarly restricted².

Qwest CRM data does not capture the Pseudo-CLEC version number attached to Purchase Order Numbers (PONs) in its LSRs. Therefore, matching was performed using date-time stamps in addition to PONs. Qwest's status date-time was used, but was modified for the reconciliation process by subtracting one hour for dates on or after Sunday, April 1, 2001 to convert the field from Mountain Daylight Time (which is appropriate for Denver, where Qwest's 14-state regional data processing takes place) to Mountain Standard Time (which is

² CGE&Y Archive File: Data Reconciliation Report #2 – EDI_Extended, hpc_adh_crm_1221_0831a, Org_HPC, parse_foc.

applicable in the State of Arizona), so that it would more closely match the data gathered by the Pseudo-CLEC.

The Pseudo-CLEC frequently submitted LSRs several times using the same PON with different version numbers, and Qwest returned FOCs for each LSR. These are valid FOCs. However, in some cases, Qwest returns multiple FOCs for the same PON and version number to either change the due date or send comments to the CLEC (Chatter FOCs). These transmissions are not valid FOCs and only the first FOC received should be counted. In most cases, these two possibilities are indistinguishable. In addition, identical FOC notifications were often stored multiple times in the Pseudo-CLEC data. Therefore, all FOCs for the same PON with an identical date-time stamp in the Pseudo-CLEC data were considered duplicates. However, it remains a possibility that an identical FOC could be recorded multiple times in the Pseudo-CLEC data but with different date-time stamps.

In matching the FOCs recorded in the Pseudo-CLEC data and reported in CRM, date-time stamps cannot be expected to match perfectly between the Pseudo-CLEC's and Qwest's different systems. The clocks on the systems involved may not always be synchronized, especially when tracking different events (e.g., Qwest's decision to send a FOC vs. the Pseudo-CLEC's receipt of a FOC).

These considerations make it infeasible to accurately distinguish FOCs resulting from Qwest's transmission of multiple FOCs for the same PON from identical FOC notifications being stored multiple times, and to accurately match the same FOC event across different data sources.

Therefore, in order to provide a reasonable approximate reconciliation, CGE&Y made the following assumption:

Assumption: All FOC records occurring for the same PON in the same clock hour are duplicates of the same FOC event.

While it is known that this assumption is not fully accurate, the maximum possible extent of its inaccuracy is also known, and that places reasonable limits on the potential error of this reconciliation. Using this assumption, CGE&Y matched the Pseudo-CLEC FOC data with the Qwest CRM data, using PON, date and hour of FOC transmission/receipt as key fields.

WCom Comment: CGE&Y fails to provide enough details to understand what evidence was used to conclude "it is infeasible to accurately distinguish FOCs resulting from Qwest's transmission of multiple FOCs for the same PON from identical FOC notifications being stored multiple times, and to accurately match the same FOC event across different data sources". As Qwest data must be validated, so must CGE&Y's. Specifically, CGE&Y does not provide the

validation steps necessary to ensure the records provided by the PCLEC were accurate.

2.2.3 Results

The reconciliation results are presented in two phases. First, CGE&Y presents a PON-level reconciliation, determining whether all LSRs for which the Pseudo-CLEC received a FOC were included in the Qwest CRM data for §271 measurement processing, and vice versa. Subsequently, CGE&Y presents a FOC-level reconciliation, determining whether FOCs received by the Pseudo-CLEC were found within the same hour as FOCs included in CRM, and vice versa. The implications of the different results are then presented.

(a) PON-level Reconciliation:

There are 1,563 unique PONs that received a FOC in the Pseudo-CLEC data. There are 1,537 unique PONs reported in CRM for which a FOC was issued. There are 1,528 PONs common to both Pseudo-CLEC and CRM data.

CGE&Y issued AZIWO1202 because the Pseudo-CLEC data included 35 PONs that were not identified as FOCs in CRM. Qwest responded that 24 of these LSRs were rejected in error. When it discovered the LSR was rejected in error, Qwest placed these LSRs back into processing without an additional supplement. Subsequently, Qwest issued a FOC. However, Qwest's performance measurement data processing excludes from CRM all notifications after a reject status. While CGE&Y accepts this explanation for why these FOCs are not in CRM, CGE&Y disagrees with their exclusion from the performance measurement consideration and recommends that such FOCs be included.

WCom Comment: WCom agrees that rejects generated by Qwest in error should not be excluded from the performance results. Had Qwest not research the discrepancy identified by CGE&Y, these records never would have been classified as being in error. Had Qwest had proper audit control procedures in place, this issue could have been avoided.

Qwest responded that 4 PONs were associated with cancel supplemental LSRs and no FOCs were sent. CGE&Y has verified that the FOC notification it received indicated that the order was being cancelled. Qwest responded that for 5 PONs, IMA shows a record of the FOC being generated, and CRM does not show corresponding information. According to Qwest, this situation was identified this summer and underwent an effort to get the databases back in sync and made system corrections. Qwest notes that these 5 PONs occurred prior to the fix dates. CGE&Y finds that due to the low numbers of this type of

problem, and Qwest's assertion that it has been monitoring the situation and is not aware of any re-occurrences that this fix does not need to be retested.

WCom Comment: Owest resolution of the issue identified by CGE&Y was to implement a system fix. Regardless of the low numbers of this type of problem, by not retesting, CGE&Y fails to validate the fix addresses the problem raised.

Qwest also provided the following explanation as to why 2 FOCs were not included in CRM:

“Two PONs received a supplemental request before the original request was processed. When a supplement is received on a PON, the original LSR is placed in an inactive status and CRM expects to receive status updates on the supplemental request. The centers incorrectly issued the FOC against the original LSR instead of sending the FOC on the Supplemental request. When this happens, CRM does not recognize the FOC being issued on the original request, therefore, not showing the FOC in the CRM ad-hoc report. The incorrect FOCs have been addressed in subsequent training/issuance of MCCs.”

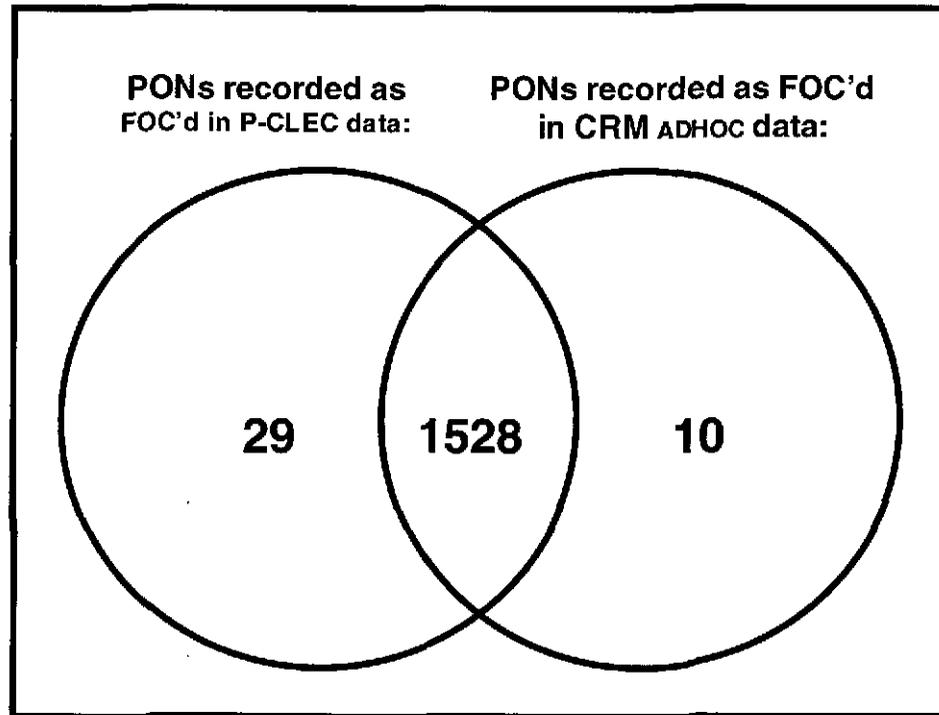
CGE&Y accepts Qwest's explanation for the omission of these 2 FOCs from CRM. Moreover, CGE&Y finds Qwest's proposed fix sufficient and that due to the low number of occurrences of this problem retesting is not required.

WCom Comment: CGE&Y fails to validate Owest proposed resolution by not retesting the identified issue. As an initial matter, CGE&Y doesn't identify in this report that the MCCs regarding this process were validated. If not validated, this is a key audit point that should have been part of the reconciliation process.

CGE&Y issued AZIWO1203 because CRM included 10 PONs for which FOCs were issued that did not appear in the Pseudo-CLEC data as a FOC. CGE&Y found that the Pseudo-CLEC's email server was down during a move when 2 of these FOCs were purportedly sent.

WCom Comment: This conclusion that an email server was down during a physical move from one location to the next doesn't make sense to WCom. If the email server was unable to retrieve the FOC information sent from Owest, Owest should have received notification. Upon that notification there should be a process in place at Owest to resend the email FOC notice. CGE&Y failed to validate whether such a process exists.

These results are summarized in the following diagram:



(b) FOC-level Reconciliation:

The Pseudo-CLEC received/stored 6,124 FOC records. Most of these were duplicate recordings of the same FOC. Using the assumption that all FOCs occurring for the same PON in the same clock-hour are duplicates, only 2,021 unique FOC transmissions were received. The number of the assumed duplicates (same PON in the same clock-hour) whose date-time stamp did not match is 319, but some of these may be different FOCs.

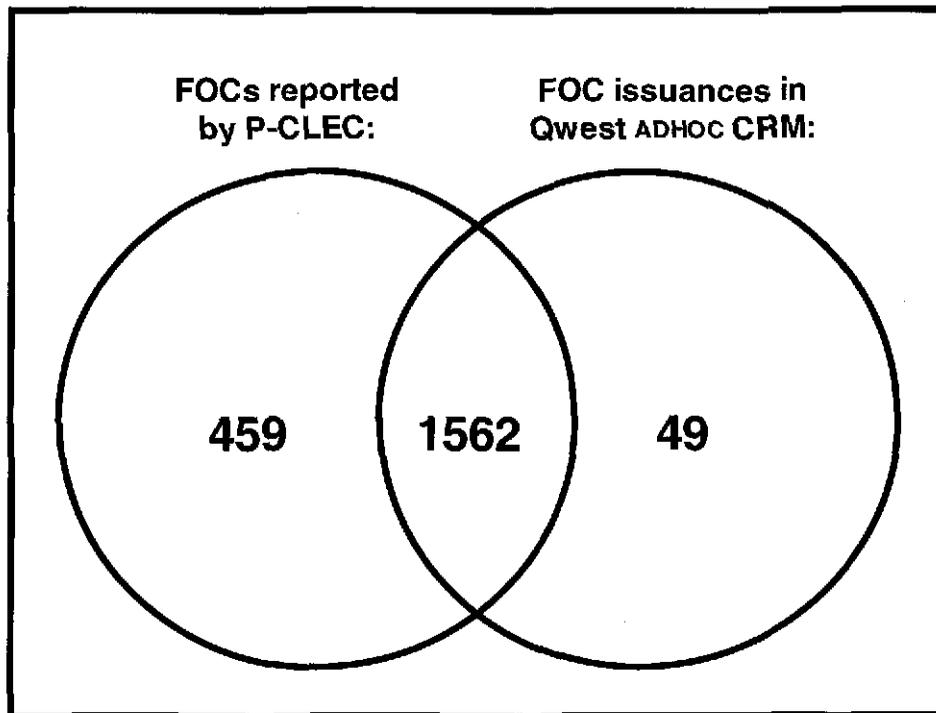
WCom Comment: CGE&Y fails to document why only 33% of the total PCLEC received/stored FOC records were utilized during the data reconciliation process. CGE&Y eliminated 4103 records without validating that the records were in fact duplicates.

Qwest's CRM table includes 1,657 FOCs issued to the Pseudo-CLEC during the Functionality Test. Of these, 45 were definite duplicate copies of other records, and one additional record is for the same PON in the same hour. This leaves 1,611 FOC transmissions according to CGE&Y's uniqueness assumption.

WCom Comment: In the above paragraph, CGE&Y was able to determine 45 records were definitely duplicated but neglects to reference how this determination could be made.

The number of FOCs common to both CRM and Pseudo-CLEC data was 1,562. Of the 1,611 CRM FOCs, 49 were not in the Pseudo-CLEC data. Of the 2,021 Pseudo-CLEC FOCs, 459 were not in the adhoc CRM data.

These results are summarized in the following diagram:



These results are subject to a certain degree of inaccuracy due to the assumption made to facilitate matching. If some of the assumed duplicate recordings are actually valid separate FOC transmissions of the same PON with different date-time stamps, the FOC results for CRM (1,562 matching Pseudo-CLEC data and 49 not matching Pseudo-CLEC data) could be increased by one. In addition, the Pseudo-CLEC results (459 not matching CRM) could be increased by the number of records which are not actually duplicate copies of other records; this number could not be more than 319. CGE&Y issued DR-245 to Qwest to verify whether or not these 319 FOCs are duplicate FOCs. In the following, 'x' will denote the unknown number of these 319 pairs which are not actual duplicates.

The results then appear to indicate a substantial discrepancy between FOCs reported by the Pseudo-CLEC and by Qwest, in that at least 23 percent ($459 + x$ out of $2,021 + x$) of the FOCs reported by the Pseudo-CLEC are not in CRM. However, this result is primarily due to Qwest's transmission of multiple FOCs for a LSR that are not all valid FOCs for measurement calculation purposes, i.e., "Chatter FOCs." See AZIWO2115 for example, which has been scheduled for

retest. Qwest excluded these FOCs from its CRM table; however, the Pseudo-CLEC did not. It is likely that several "Chatter FOCs" do not occur within one hour of the original FOC and are thus not covered under CGE&Y's assumption for duplicate FOCs.

In comparing the results of the PON-level and the FOC-level reconciliation's, CGE&Y found that the reduction in FOC discrepancies from 459+x in the FOC-level reconciliation to 35 in the PON-level reconciliation demonstrates that the vast majority of FOCs received by the Pseudo-CLEC that were not recorded in CRM were "Chatter FOCs." These 35 PONs were associated with 40 different FOCs in the Pseudo-CLEC data and are included in 459+x FOCs that did not match CRM in the FOC-level reconciliation. For these 40 FOCs, there must be at least one FOC for each of the 35 PONs that is not a Chatter FOC. Each of the 35 PONs found in the Pseudo-CLEC data that did not match CRM in the PON-level reconciliation had one FOC which was not a Chatter FOC. The increase from 9 PONs reported in CRM that were not found in the Pseudo-CLEC data in the PON-level reconciliation the 49 CRM FOCs that were not Pseudo-CLEC data in the FOC-level reconciliation, indicates that there were a corresponding 40 FOCs in the Pseudo-CLEC that were not Chatter FOCs. Thus 75 of the 459+x FOCs in the Pseudo-CLEC data that did not match CRM and are not Chatter FOCs. Therefore, CGE&Y estimates that there were the number of "Chatter FOCs" is $459+x - 75$. CGE&Y submitted the 459 Chatter FOC candidates as a supplement to AZIWO2115. (Any of the 319 pairs submitted in DR-245, which are not true duplicates, would also contain at least one FOC which is a Chatter FOC.)

Of the 75 FOCs in the Pseudo-CLEC data determined not to be Chatter FOCs, 35 were not included in CRM (as noted previously in AZIWO1202). For the remaining 40 FOCs, CRM included FOCs for the same PONs but the reported FOC time in CRM differed by more than one hour from when the FOC was received by the Pseudo-CLEC. These 40 FOCs are the subject of AZIWO1204.

CGE&Y submitted AZIWO1205 regarding the 49 FOC issuances recorded in CRM for which no FOCs were received by the Pseudo-CLEC within one hour of the CRM FOC issuance time for that PON. Qwest has acknowledged that the FOC date and time recorded in CRM for 5 of the LSRs is incorrect.

In conclusion, ignoring Chatter FOCs, 95.4% of FOCs received by the Pseudo-CLEC ($1562 / (75+1562)$) were included in CRM as issued within one hour of the time received by the Pseudo-CLEC; 97.0% of CRM FOC issuances ($1562 / 1611$) were received by the Pseudo-CLEC within one hour of the time the FOC-issuance was indicated in CRM.

WCom Comment: The above evidence uncovered by CGE&Y reflects that Owest does not have the proper means to accurately capture FOC data to report valid PID results.

2.3 Jeopardies

2.3.1 Introduction

The jeopardy data reconciliation compared jeopardy notifications provided by Qwest to the Pseudo-CLEC with Qwest's adhoc jeopardy table to determine whether: (1) jeopardy notifications to the Pseudo-CLEC were provided for orders which Qwest considered to be jeopardies, and (2) jeopardy notifications provided by Qwest to the Pseudo-CLEC were included as jeopardies in Qwest's data processing for §271 measurement reporting.

WCom Comment: The Owest supplied ad hoc data source described above is referred to as a ad hoc jeopardy table, yet in CGE&Y's introduction all files were described as data files. WCom believes there is a distinct difference between data files, data tables and/or database provided ad hoc information. The means for which Owest developed these records must be validated and not taken at face value as accurate. In doing so, a critical validation step was missed during the data reconciliation process.

2.3.2 Process

The Qwest adhoc jeopardy files for each month from December 2000 through August 2001 were combined and restricted to Pseudo-CLEC records only. The Qwest adhoc jeopardy file, by design, contained a record for each completed order for which the commitment was missed and/or for which a jeopardy notification was provided. Since many of these records were for missed commitments where no jeopardy notification was provided, these were eliminated, producing a table of adhoc jeopardies³.

A table was built of all notifications received by the Pseudo-CLEC which were indicated to have a jeopardy transaction type. In addition, status update transactions with an order status indicating a jeopardy were also considered as jeopardy notifications provided to the Pseudo-CLEC. This list of jeopardy notifications was matched against all LSRs receiving SOCs, to restrict consideration to only those jeopardy notifications received by the Pseudo-CLEC which were on orders for which the Pseudo-CLEC received completion notification.

³ CGE&Y Archive File: Data Reconciliation Report #2 – hpc_adh_jeop1221_0801

As the adhoc jeopardy table is based on order number, and the Pseudo-CLEC data are based on PON, a table was built containing all order numbers known to be generated from each LSR to enable matching of the two data sets.

WCom Comment: CGE&Y description of the process indicates a number of steps prior to what information was utilized to compare with Qwest provided data. What lacks in this report is a means of understanding those steps and the validation measures CGE&Y took to ensure the data was valid after exclusions were applied.

2.3.3 Results

The Qwest adhoc jeopardy file contained 17 jeopardies on orders registered in RSOR as completed. PONs were found for 17 of the orders. Two of these were associated with non-Functionality Test PONs and were excluded from this reconciliation.

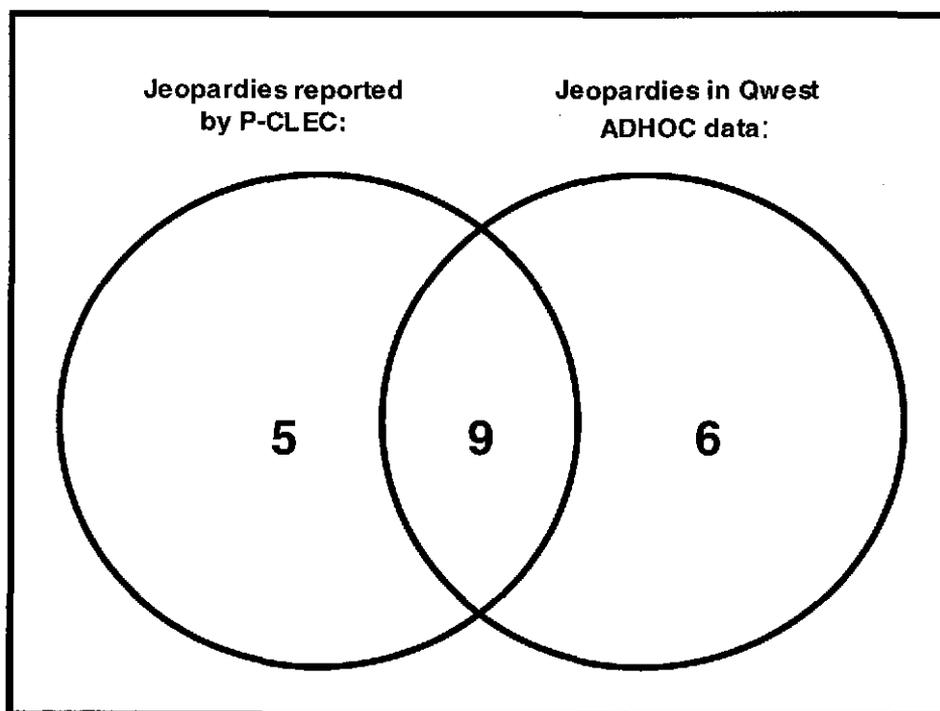
Among the Pseudo-CLEC data, there were 20 unique LSRs which received jeopardy notifications. There were 3 additional orders which received status updates with an order status of "Jeopardy", "JEPC 01 DD" and "JEPC 03 DD." Eleven of the 23 LSRs received SOC's.

Nine jeopardies were common to both the adhoc data and the jeopardy notifications identified by the Pseudo-CLEC. Six jeopardies in Qwest's adhoc data were not identified in the Pseudo-CLEC data. Of these, five were PO-8 eligible and one was PO-9 eligible.

Five jeopardy notifications received by the Pseudo-CLEC were not included in Qwest's adhoc jeopardy file; all were Functionality Test PONs. These exhibited the following event descriptions and error messages:

- No Access
- Due date change for F1 facilities construction
- Construction Job in Progress

These results are summarized in the following diagram:



Of the 14 jeopardies received by the Pseudo-CLEC, 5 were not present in Qwest’s adhoc data and were thus not considered by Qwest in their performance measurement data processing. As these 5 orders were all registered as complete in RSOR, and jeopardy notification was provided to the Pseudo-CLEC, these jeopardies should have been included in Qwest adhoc jeopardy data. That they were not is the subject of AZIWO1199. Qwest has responded indicating that jeopardies due to a Customer-Not-Ready condition would not be included in Qwest’s Regional Tracking Tool and hence may or may not appear in Qwest’s adhoc jeopardy table, depending on whether the due date was missed. Even if they do appear, their record will not indicate that a jeopardy notification was issued, even though it might have been. This is not of concern, as the record will be excluded from the jeopardy measures due to the Customer-Not-Ready condition. This satisfactorily explains two of the 5 jeopardies not included (as jeopardies) in the adhoc jeopardies table. In two other cases, Qwest responded that a manual error was responsible for mistakenly keeping out jeopardies from RTT. Qwest is performing further research on the final case.

In addition, for 6 of the 15 jeopardies in Qwest’s adhoc data, no jeopardy notification was received by the Pseudo-CLEC. This is the topic of AZIWO1039.

WCom Comment: CGE&Y fails to validate Qwest assertion that 5 jeopardy orders were due to customer not ready. Since CGE&Y identified

the discrepancy, these orders were excluded prior to the file provided by Owest for the data reconciliation process. Had CGE&Y validated the files received from Owest, this discrepancy could have been explained without issuance of an IWO.

2.4 Rejects

2.4.1 Introduction

The reconciliation of rejects compared rejects identified in Qwest's adhoc CRM data file to rejects found in the Pseudo-CLEC data.

2.4.2 Process

The Qwest adhoc CRM data files for each month from December 2000 through August 2001 were combined and restricted to Pseudo-CLEC rejects only. Auto-rejects were identified as those reject records in CRM that originated from the Business Process Layer (BPL) data. All other rejects in CRM were manual rejects. It was not possible to identify in the Pseudo-CLEC data whether an LSR was rejected manually or automatically. Due to the lack of identifying data for auto-rejects in Qwest's adhoc CRM file, auto-rejects reported by Qwest could not be uniquely matched to rejects in the Pseudo-CLEC data. The only data available in CRM for auto-rejects were Status, CLEC ID, Source, First Status Date (SDATE), Last Status Date (LDATE), Reject Flag, Product Type, and Flow-through. These data fields are sufficient to match individually rejected LSRs. Therefore, nothing other than a count of the auto-reject records was available for analysis⁴.

WCom Comment: According to the above paragraph, it seems that the CRM file can distinguish between an auto-reject (BPL) and a manual one yet the PCLEC data cannot. If that is correct, the following statement doesn't make sense to WCom "Due to the lack of identifying data for auto-rejects in Owest's adhoc CRM file, auto-rejects reported by Owest could not be uniquely matched to rejects in the Pseudo-CLEC data." In addition, if "nothing other than a count of the auto-reject records was available for analysis", how did CGE&Y validate the PID results for the PCLEC?

Duplicate rejects in the Pseudo-CLEC data were removed based on the following criteria: rejects with identical PONs and date-time values were considered duplicate rejects.

⁴ CGE&Y Archive File: Data Reconciliation Report #2 – EDI_Extended, hpc_adh_crm_1221_0831a, Org_HPC, parse_rej.

Manual rejects in Qwest data were matched to Pseudo-CLEC rejects based on PON and the date-time stamp. The same PON can appear multiple times and the date-time value is measured as year, month, day, hour, minute and second. Records that matched exactly on PON were considered a match if the date-time value was within five minutes. This five-minute window allowed for differences in clock setting between the Pseudo-CLEC and Qwest. Pseudo-CLEC identified rejects that did not match Qwest-reported manual rejects were considered auto-rejects, and the count of these was compared with a count of the automated rejects identified in the Qwest CRM file.

WCom Comment: CGE&Y description of the process indicates a number of steps prior to what information was utilized to compare with Qwest provided data. What lacks in this report is a means of understanding those steps and the validation measures CGE&Y took to ensure the data was valid after exclusions were applied.

2.4.3 Results

After removal of duplicate records from CRM, there remained 310 manual rejects and 2,468 auto-rejects. The Pseudo-CLEC data consisted of 1,747 records with no means of differentiating between manual and auto-rejects.

Of the 310 manual rejects from CRM, 284 were matched to a reject record in the Pseudo-CLEC data. Thus, 26 manual rejects reported in CRM were not also identified in the Pseudo-CLEC data. CGE&Y issued AZIWO1210 detailing these 26 manual rejects not found in Pseudo-CLEC data. It is unknown if any other rejects identified in the Pseudo-CLEC data were rejected manually. Qwest's research indicates that all reject notifications were sent, however, Qwest did not find 9 of these in either its EDI translator or GUI tracking database. CGE&Y performed further research to determine that 7 of these 26 were not related to the Functionality test, and in 6 other cases it seems that a time zone and/or AM/PM recording issue prevented the Pseudo-CLEC and Qwest reject notification records' times from being reasonably close. Of the remaining 13 cases, the Pseudo-CLEC was able to use Qwest's screen shots to determine that they had indeed received 5 of these reject notifications. In one case the Pseudo-CLEC's email server was known to be down due to a move at the time the reject notification was sent. This leaves 7 notifications for manual rejects regarding which Qwest claims to have sent the notification and the Pseudo-CLEC claims not to have any record of its receipt.

WCom Comment: This conclusion that an email server was down during a physical move from one location to the next doesn't make sense to WCom. If the email server was unable to retrieve the FOC information sent from Qwest, Qwest should have received notification. Upon that notification there should be a process in place

at Qwest to resend the email FOC notice. CGE&Y failed to valid such a process exist.

Each of the remaining 1,463 reject records in the Pseudo-CLEC file was assumed to be associated with one of the auto-reject records in CRM. This left 1005 auto-reject records in CRM (out of 2,468) that are unaccounted for in the Pseudo-CLEC data. Early in the test, the status update indicator was not provided to the Pseudo-CLEC. Therefore, Pseudo-CLEC data did not include all auto-rejects sent by Qwest, which helps in understanding the large portion of CRM auto-rejects (1005 out of 2468, which equals 40.7%) not found in the Pseudo-CLEC data. When this analysis was performed by restricting to LSRs rejected in May or June, there were 351 auto-rejects in CRM. There were 394 Pseudo-CLEC rejects during the same time period that could not be matched with a manual reject in CRM and were therefore assumed to be auto-rejects. For the two month period, May and June 2001, only 10.9% of the Pseudo-CLEC auto rejects were not accounted for in CRM. The decrease in the magnitude of the discrepancy (from 40.7% to 10.9%) suggests that the bulk of the problem originally detected for auto-rejects was due to the status update indicator not being provided to the Pseudo-CLEC in the earlier part of the test.

WCom Comment: CGE&Y fails to provide conclusive evidence that validates Qwest has accurately reported PCLEC results for rejected records.

2.5 Maintenance and Repair (M&R)

2.5.1 Introduction

The M&R data reconciliation validated whether the trouble tickets received by the Pseudo-CLEC from Qwest were reflected in Qwest's Mechanized Trouble Analysis System (MTAS) and Work Force Administration and Control / Repair (WFAC) data files, and that the Pseudo-CLEC received status update notifications for all troubles identified by Qwest in MTAS and WFAC.

2.5.2 Process

The Qwest adhoc MTAS and WFAC files for each month from December 2000 through August 2001 were combined and restricted to Pseudo-CLEC records only. Pseudo-CLEC M&R data were assembled from the following sources⁵:

- M&R status update e-mails received from Qwest's CEMR system by the Pseudo-CLEC
- CGE&Y log of troubles reported via EB-TA

⁵ CGE&Y Archive File: Data Reconciliation Report #2 – parse_mr, hpc_adh_wfac1221_0801, hpc_adh_mtas1221_0801.

- CGE&Y log of troubles reported via CEMR
- Pseudo-CLEC log of Incidental Contacts and Issues related to M&R.

For troubles on non-designed services, the M&R data reconciliation validated whether trouble tickets generated by the Pseudo-CLEC as recorded from the above sources matched the troubles reported in MTAS. This matching was based on telephone number. For each matching non-designed trouble involving status update emails, the Trouble Report Receipt date in MTAS was matched against the first trouble report status update time recorded by the Pseudo-CLEC. In addition, the Trouble Report Cleared date in MTAS was matched against the last trouble report status time recorded by the Pseudo-CLEC.

For troubles on designed services, the M&R data reconciliation validated whether trouble tickets generated by the Pseudo-CLEC matched the trouble tickets reported in WFAC as recorded from the above sources. For status update emails, Qwest Trouble Report ticket numbers found in the Pseudo-CLEC data were matched with the Repair Ticket Number in WFAC, the Received Date in WFAC was matched against the first trouble status date recorded by the Pseudo-CLEC, and the Closed Date was matched against the last trouble status date recorded by the Pseudo-CLEC. For the other Pseudo-CLEC data sources, matching was performed using the circuit-identifier field.

WCom Comment: CGE&Y fails to provide enough details to understand why exclusions were applied for either the PCLEC data or Owest provided data prior to reconciliation. This audit point is a necessary procedure that would ensure processing of records from end to end.

2.5.3 Results

For non-designed services, the MTAS file contained 82 troubles, and there were 86 unique troubles found in the Pseudo-CLEC data sources on services installed for the Pseudo-CLEC during the functionality test. There were 66 troubles common to both data sets. Of the 86 non-designed services trouble tickets identified in the Pseudo-CLEC data, 20 were not found in MTAS. On further investigation four of these were found to actually be present in MTAS, but as Retail tickets. This is the subject of AZIWO1206. Qwest responded that for 3 of these tickets, the repair ticket was opened before LMOS had any record of the accounts being converted to Wholesale. Therefore, CGE&Y finds that it is unreasonable to expect these tickets to be properly classified as Pseudo-CLEC. The remaining ticket was for an account that was never part of the Functionality Test. CGE&Y does not understand why the customer for that account reported a trouble to the Pseudo-CLEC. CGE&Y has closed this IWO.

WCom Comment: The PCLEC would be unable to open a trouble ticket prior to conversion to Wholesale. That fact should not allow for scenarios such that one of Owest OSSs (LMOS) had no record of the established wholesale account. Thus

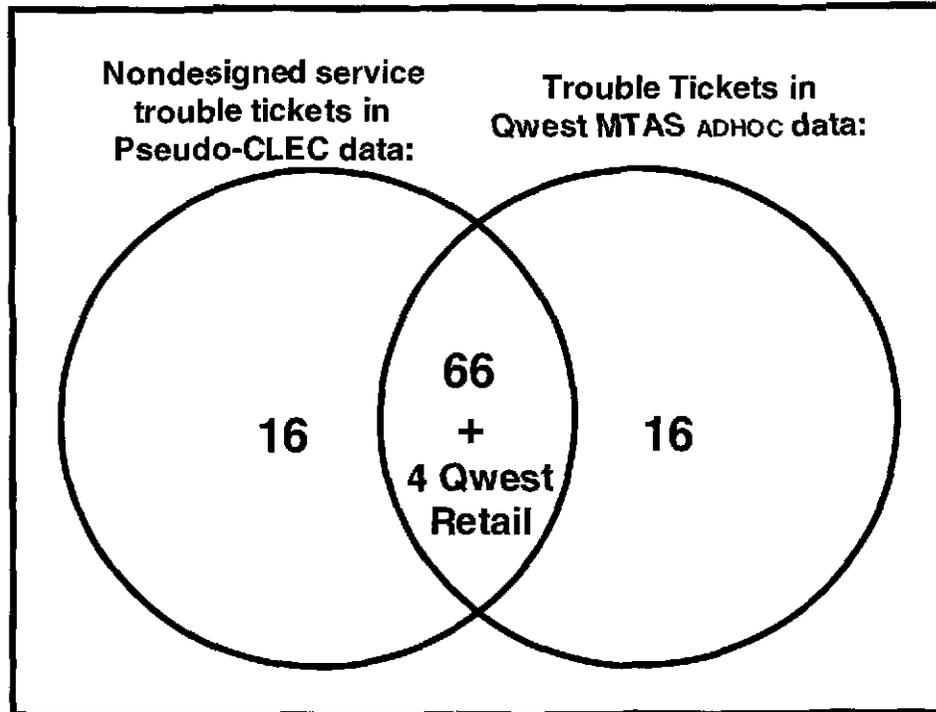
these records are valid and should have been accounted for in the PID results. As well, further research should be performed on the account that was identified as the PCLECs incorrectly. Audit controls need to be implemented to eliminate such scenarios from happening in the future.

The other 16 not found in MTAS are the subject of AZIWO1207. Qwest explained that 2 of these troubles would not have been included in MTAS as they were initiated by someone other than the customer. CGE&Y does not agree with Qwest's assertion that 6 of these troubles were included in MTAS. Qwest contends they have no knowledge of any trouble for the remaining 8 tickets.

Of the 82 troubles in MTAS, 16 trouble tickets were not identified in the Pseudo-CLEC data. This is the subject of AZIWO1208. Qwest provided evidence that these 16 tickets were valid troubles. CGE&Y accepts Qwest's explanation that trouble tickets for the 8 physical plant disruptions were generated by Qwest. CGE&Y finds that the remaining 8 tickets were likely generated by CGE&Y and not documented.

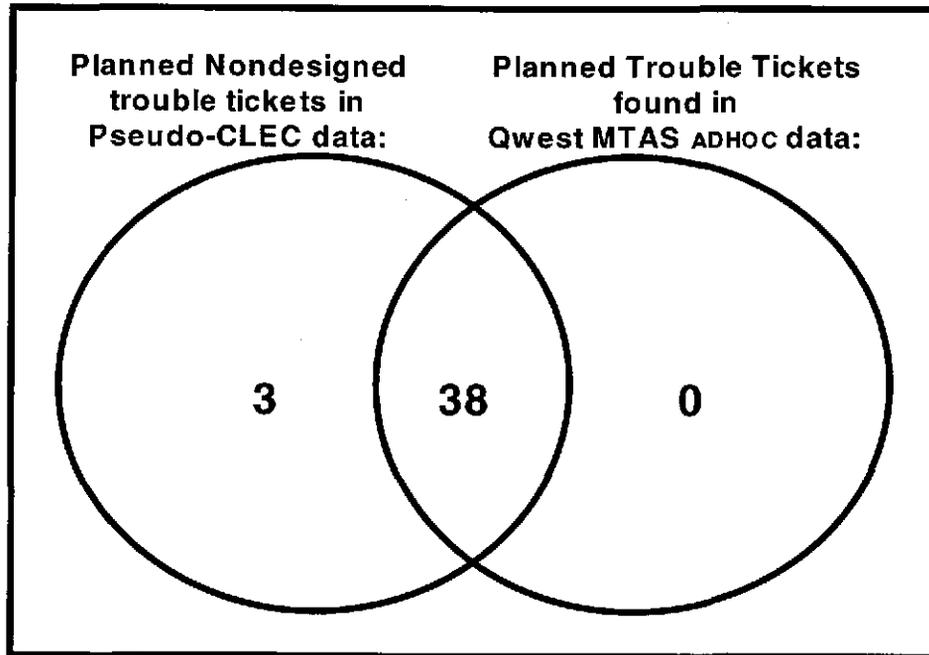
WCom Comment: CGE&Y fails to provide evidence to substantiate Qwest response to the IWO's issued. Root cause analysis needs to be performed to understand discrepancies between PCLEC data and Qwest data.

These results are summarized in the following diagram for all non-designed troubles:

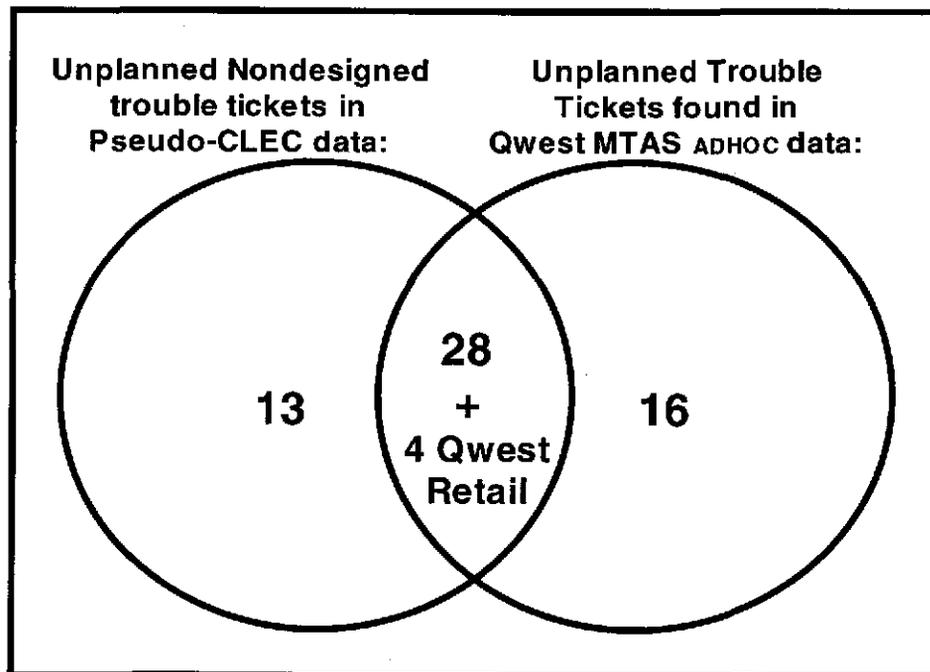


Note: The “4 Qwest Retail Tickets” in the above diagram denotes the 4 Pseudo-CLEC troubles which were found in MTAS but were designated in MTAS as Retail troubles.

Breaking this out by whether troubles are planned or unplanned can only be done from the Pseudo-CLEC data, so all MTAS troubles not found in the Pseudo-CLEC data are assumed to be unplanned. This leads to the following diagram for planned troubles:



The following diagram illustrates the results for unplanned non-designed service trouble tickets:



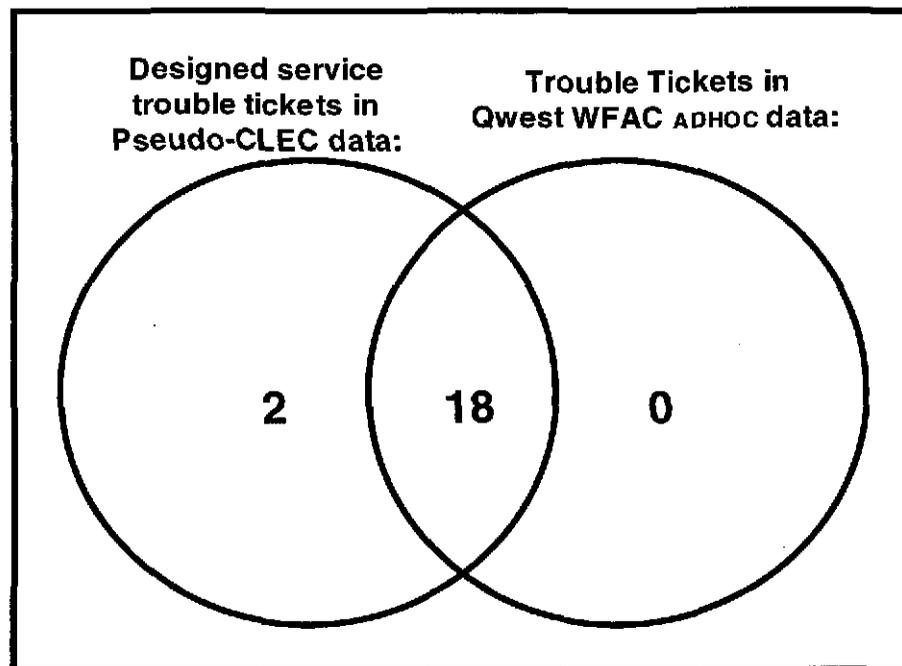
Note: The "4 Qwest Retail Tickets" in the above diagram denotes the 4 Pseudo-CLEC troubles which were found in MTAS but were designated in MTAS as Retail troubles.

The trouble status times in the status update emails provided by Qwest to the Pseudo-CLEC are always seven hours later than corresponding receive and clear times of the troubles in the Qwest MTAS adhoc data files. CGE&Y issued AZIWO1197 on this subject. Qwest responded to the effect that CEMR times are stated in Greenwich Mean Time, whereas MTAS times are in local time. CGE&Y verified that this was properly covered in Qwest documentation and withdrew this IWO.

Status update emails for four non-designed trouble tickets were provided on July 20, 2001. However, these tickets were closed according to MTAS on June 4, 5, 22, and 23, 2001. As a result of these late status updates, CGE&Y issued AZIWO1050. Qwest responded saying that these were diagnosed in July to be due to intermittent failures in the communications network linking CEMR and the host repair application. Qwest indicated that this problem has been repaired and has also implemented an automated procedure to correct out-of-sync statuses within two hours of occurrence.

For designed services, the WFAC file contained 18 troubles, and 30 troubles were found in the Pseudo-CLEC data. There were 18 troubles common to both data sets. Of the 30 designed services trouble tickets identified in the Pseudo-CLEC data, 12 were not found in WFAC. Of the 18 troubles reported in WFAC, all were identified in the Pseudo-CLEC data.

These results are summarized in the following diagram:



The Pseudo-CLEC received status update emails for only one of the 12 circuits that experienced trouble and were not found in WFAC. In response to DR-244 which asked why this trouble was not in WFAC, Qwest stated that “When a trouble ticket is opened and there is a pending disconnect order, as soon as the due date is completed, all evidence of the trouble ticket is gone from WFAC. The trouble ticket would be canceled because it could not be completed.” The series of status update emails received for this circuit do indicate that there was a pending disconnect order on the circuit when this ticket was opened. The other 11 circuits had entries in the Pseudo-CLEC Incidental Contact Log indicating either “Qwest callback – trouble resolved” (3 cases) or “Qwest callback – additional info request” (8 cases). These 11 troubles are the subject of AZIWO1209. Further research by the Pseudo-CLEC has indicated that 8 of the 11 incidental contacts and issues concerning circuits reported in this IWO were for installation contacts and not M&R troubles as initially reported. An additional 2 contacts had an inadvertent transposition in the circuit number and when this is corrected now match tickets reported in WFAC. The remaining contact is for a circuit which was about to be disconnected. Previous responses from Qwest have indicated that troubles with pending disconnects will not be included in MTAS and WFAC. Based on the above considerations, CGE&Y has withdrawn this IWO as all troubles on circuits in the Pseudo-CLEC data (other than on pending disconnects) were included in WFAC.

WCom Comment: Qwest has failed to verify that Qwest is M&R PID compliant.

2.6 Gateway Availability

2.6.1 Introduction

The gateway availability data reconciliation validated whether all Pseudo-CLEC-observed gateway outages were accounted for in the total gateway outage downtime reported by Qwest. The Pseudo-CLEC did not experience all gateway outages, and therefore, a complete validation of the total gateway outages was not possible.

2.6.2 Process

The Pseudo-CLEC captured the following information relating to all gateway outages that it experienced:

- ◆ Date of the Outage
- ◆ Up Time
- ◆ Down Time
- ◆ Duration of the Outage
- ◆ Media Type

◆ Responsible for Outage (Qwest or Pseudo-CLEC)

Total Pseudo-CLEC-observed down times for each month were calculated by adding all observed Qwest-caused outages during the month. Qwest-reported down times are calculated from Qwest’s raw data by adding outages on Fetch ‘N Stuff Data Arbiter systems to the interface outages (GUI or EDI).⁶

WCom Comment: A better understanding and validation of how Qwest captured down time is required.

2.6.3 Results

The following table displays the comparison between the Pseudo-CLEC-observed downtimes and the downtimes reported by Qwest for the IMA-Graphical User Interface (GUI) interface (which also includes outages for Fetch ‘N Stuff and Data Arbiter, as these would be indistinguishable from GUI outages to a CLEC):

GA-1 - Gateway Availability - IMA-GUI (in min)		
Month	Downtime reported by the Pseudo-CLEC	Downtime reported by Qwest
Jan-01	92	15
Feb-01	187	0
Mar-01	>50	35
Apr-01	145	116
May-01	0	172
Jun-01	0	0

As illustrated in the above table, the Pseudo-CLEC reported more than fifty minutes of downtime in March. Four outages were recorded during this period for which two were intermittent, and therefore no “end of outage time” was recorded. The other two outages totaled fifty minutes of downtime.

Down times which the Pseudo-CLEC observed on the IMA-GUI determined to be attributed to Qwest exceeded the down times reported by Qwest during the months of January, February, March and April; therefore, AZIWO1198 was issued.

In response to this IWO, the evidence provided by Qwest supports that their procedures for documenting gateway outages is in compliance with the PID. Several of the outages found would count towards GA-1 under the current

⁶ CGE&Y Archive File: Data Reconciliation Report #2 – Gateway_Qwest Down Times and Gateway_Pseudo-CLEC Down Times.

definition of GA-1 in place since August. However, under the prior definition, they were correctly excluded. This IWO has therefore been closed.

The following table displays the comparison between the Pseudo-CLEC-observed down times and the down times reported by Qwest for the IMA-EDI interface (which also includes outages for Fetch 'N Stuff and Data Arbiter as these would be indistinguishable from EDI outages to a CLEC):

GA-2 - Gateway Availability - IMA-EDI (in min)		
Month	Down Time reported by the Pseudo-CLEC	Down Time reported by Qwest
Jan-01	0	205
Feb-01	0	751
Mar-01	0	30
Apr-01	0	159
May-01	0	250
Jun-01	0	0

There were no Qwest-caused gateway outages for the IMA-EDI interface observed by the Pseudo-CLEC.

WCom Comment: CGE&Y fails to provide evidence that validates Qwest provided the PCLEC accurate performance results.

2.7 Billing

2.7.1 Introduction

The billing data reconciliation process compared Qwest adhoc billing data to the information contained in the electronic CRIS bills received by the Pseudo-CLEC.

2.7.2 Process

The billing data reconciliation required that all the CRIS bills be sent to the Pseudo-CLEC. In addition, the Daily Usage Files (DUF) received from Qwest were collected. Qwest adhoc data consisted of four separate data files, one for each billing performance measure. CGE&Y performed a separate reconciliation of each adhoc data file with Pseudo-CLEC captured data⁷.

⁷ CGE&Y Archive File: Data Reconciliation Report #2 – hpc_adh_ia1a1221_0601, hpc_adh_iabs1221_0601, hpc_adh_bi3a1221_0601, hpc_adh_cris1221_0601, bi-1_DUF.

WCom Comment: How did CGE&Y validate the billing data files provided by Qwest? This is a critical validation step that should have been part of the reconciliation process.

The reconciliation of Qwest adhoc billing data for Performance Measure BI-1 with Pseudo-CLEC captured data compared the average time to provide usage records as calculated from Qwest adhoc data and Pseudo-CLEC captured data. CGE&Y constructed a table detailing all usage records transmitted to the Pseudo-CLEC by Qwest. In addition, CGE&Y constructed a data set of all Qwest adhoc data for BI-1 for the period January through June 2001.

The reconciliation of Qwest adhoc billing data for Performance Measure BI-2 with Pseudo-CLEC captured data compared the date that the Qwest adhoc data indicated the CRIS bill was sent with the date the CRIS bill was received by the Pseudo-CLEC. CGE&Y constructed a data set of all Qwest adhoc data for BI-2 for the period January through June 2001.

The reconciliation of Qwest adhoc billing data for Performance Measure BI-3 with Pseudo-CLEC captured data compared the adjustments made to Pseudo-CLEC bills indicated in the Qwest adhoc data with the adjustments indicated on the CRIS bill. CGE&Y constructed a data set of all Qwest adhoc data for BI-3 for the period January through June 2001.

The reconciliation of Qwest adhoc billing data for Performance Measure BI-4 with Pseudo-CLEC captured data compared the number of recurring and non-recurring charges associated with service order completions that appeared on the next bill as indicated in the Qwest adhoc data with the same figure as indicated in the CRIS bills. CGE&Y constructed a data set of all Qwest adhoc data for BI-4 for the period January through June 2001.

2.7.3 Results

The Pseudo-CLEC did not receive electronic bills from Qwest for the following months and products:

Month	Product
January	Resale
	UNE-L
February	UNE-P
	Resale
April	UNE-L
	Resale
May	UNE-P
	Resale
June	UNE-L
	Resale
July	UNE-L

The missing 11 CRIS bills are the subject of AZIWO1211. In its response to this IWO, Qwest indicated that it had transmitted the electronic CRIS bills for the above accounts and months. However, CGE&Y has verified that the Pseudo-CLEC did not receive the bills as detailed by Qwest and maintains its position that these bills were not sent. Absent these 11 bills, CGE&Y cannot perform a full reconciliation for all Qwest adhoc billing data files. The following reconciliation results are based on available data.

WCom Comment: A full reconciliation of Qwest ad hoc billing data must be performed in order to validate that Qwest billing reports accurately reflects performance provided. CRIS bills not generated by Qwest do not remove the need to validate billing performance measures.

Time to Provide Usage Records

Pending further investigation.

Invoices Delivered Within 10 Days

Qwest adhoc data for Invoices Delivered within 10 Days (BI-2) reports that 100 percent of invoices were transmitted to the Pseudo-CLEC within 10 days of the bill date for each month January through June 2001. However, the Pseudo-CLEC did not receive CRIS bills for month-product combinations listed in table 2.7.3.1 (AZIWO1211). The following table presents the transmission and receipt dates of the electronic CRIS bills:

Table 2.7.3.3. Invoices Transmitted Within 10 Days

Product	Bill Date	Qwest Transmitted Date (adhoc)	Pseudo-CLEC Received Date
UNE-P	01/19/01	01/24/01	01/24/01
	02/19/01	02/26/01	Bill not Received
	03/19/01	03/26/01	03/26/01
	04/19/01	04/25/01	04/25/01
	05/19/01	05/25/01	Bill not Received
	06/19/01	06/25/01	06/25/01
Resale	01/25/01	01/31/01	Bill not Received
	02/25/01	03/02/01	Bill not Received
	03/25/01	04/02/01	04/02/01
	04/25/01	05/02/01	Bill not Received
	05/25/01	06/01/01	Bill not Received
	06/25/01	07/02/01	07/02/01
UNE-L	01/25/01	01/31/01	Bill not Received
	02/25/01	03/02/01	Bill not Received
	03/25/01	03/30/01	03/30/01
	04/25/01	04/30/01	04/30/01
	05/25/01	06/01/01	Bill not Received
	06/25/01	07/02/01	Bill not Received

CGE&Y finds that in cases where the Pseudo-CLEC received the CRIS bill, the transmit date recorded in the Qwest adhoc data matches the date observed by the Pseudo-CLEC. (This equality of receipt and transmit dates applied uniformly to all of the several hundred invoices on each of the bills received.)

Billing Accuracy

Qwest adhoc data for Billing Accuracy (BI-3) contained 9 adjustments to Pseudo-CLEC bills during the Functionality Test for a total credit of \$89.16. CGE&Y identified 6 of the 9 adjustments in the combined CRIS bill for April and May. These 6 credit adjustments totaled \$17.66. The remaining 3 adjustments were not in the CRIS bills provided to the Pseudo-CLEC. According to the Qwest adhoc data, these 3 credit adjustments totaled \$71.50, all for the same account and appeared on the May Resale Bill. CGE&Y issued AZIWO1213 detailing the 3 adjustments not identified in the CRIS bill. In its response to this IWO, Qwest indicated that the service order establishing this account erred, causing the GRP and BAPC FIDs to be incorrectly removed from the order. As a result, this account was established as a stand alone bill, not billing to the summary bill which CGE&Y checked. However, the adjustments did apply to the May 25, 2001 bill but because this account was not associated with a summary arrangement, these adjustments did not appear on the summary bill. Qwest issued a service order to correct this account in August by adding the GRP FIDs and BAPC FID. CGE&Y accepted Qwest's proposed solution to

issue an MCC to reinforce the need to include these FIDs on service orders and closed this IWO.

WCom Comment: CGE&Y fails to provide evidence that Qwest provides bill accuracy. Absent this evidence, reconciliation should continue until conclusive results can be provided.

Billing Completeness

Qwest adhoc data for Billing Completeness (BI-4) contained 1,230 recurring or non-recurring charges associated with completed service orders. 10 of these 1,230 did not appear on the correct bill during the period February through June 2001 (Qwest adhoc data for January was not available). There was no identifying information for these charges in the adhoc data. Therefore, only counts are available for comparison purposes. CGE&Y found that 70 out of 1,476 charges associated with completed services orders on the CRIS bills did not appear on the correct bill during the same time period. CGE&Y issued AZIWO1214 on this subject. Qwest responded that CGE&Y was not correctly calculating the bill completeness and was counting rate change activity as delayed order activity, which are not part of BI-4A, in its analysis. Qwest determined that excluding these accounts lowered the count of 'late orders' to about 38. However, Qwest acknowledged that its programming to calculate BI-4A was using a data source whose aging schedule may not perfectly align with a 30-day bill cycle. Qwest stated it would perform additional investigation and would supplement its response to this IWO.

WCom Comment: CGE&Y fails to provide evidence that Qwest provides billing completeness. Absent this evidence, reconciliation should continue until conclusive results can be provided.

2.8 IWO Status

IWO #	Subject	Owner	Responder	Status Description
1039	Jepardies	Aaron	CGE&Y	Analyzing response.
1050	M&R	Veronica	Closed pending re-test	Waiting on re-test trouble tickets to be submitted to verify auto-closing of the ticket in MTAS.
1197	M&R	Aaron	Withdrawn	
1198	Gateway	Veronica	Closed	PAC sent 11/21/01
1199	Jepardies	Aaron	Qwest	Returned to Qwest 11/28/01 for clarification. Have a verbal answer. Document updated. Need research on 1 jeopardy.
1200	SOC	Tom	Qwest/HPC	Need clarification on 4 SOC's. Need clarification on 20 accounts created by HPC and logged in RSOR as retail for 19 and another CLEC for 1. The response to Qwest was sent Sunday Dec. 2nd Waiting a Qwest response.
1201	SOC	Tom	Closed	PAC sent 12/03/01.
1202	FOC	Aaron	CGE&Y/Qwest	Scenario #1 is the issue. FOC after incorrect reject gets excluded from CRM and is not counted for measures.
1203	FOC	Aaron	Qwest	Returned to Qwest to clarify 6 EDI FOC's. This IWO seems to be related to 2069 (non-receipt of SOC's). Waiting on Qwest.
1204	FOC	Aaron	CGE&Y	Response received from Qwest. Analyzing data.
1205	FOC	Aaron	Qwest	Waiting on the remainder of the information as stated by Qwest in the IWO response. Response received, pending analysis of the data.
1206	M&R	Aaron		PAC sent 12/04/01
1207	M&R	Aaron	CGE&Y/HPC	Completion notification received from Qwest. 14 of the 16 contacts are still at issue. Aaron is checking with the data content to see if any have been resolved.
1208	M&R	Aaron	Closed	PAC sent 11/28/01
1209	M&R	Aaron	Withdrawn	
1210	Rejects	Aaron	Closed pending clarification of the screen prints	Qwest showed sufficient evidence that reject notification was sent. This verifies the adhoc data is correct. CGE&Y does reserve a hold status on the IWO to clarify the fields timings and their interpretation on the prints.
1211	Billing	Tom	Qwest	The IWO returned to Qwest with supplement data on missing electronic CRIS bills.
1213	Billing	Tom	Closed	PAC sent 11/29/01
1214	Billing	Tom	Qwest	Waiting on Qwest to evaluate CGE&Y's response. This was to be supplemented by the 28 th of Nov. No response received to date.