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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** **AT&T'S BRIEF ON LIBERTY DATA RECONCILIATION REPORT**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T") hereby file their brief on Liberty Consulting Group's ("Liberty") data reconciliation of Qwest Corporation's ("Qwest") performance measure data.

I. INTRODUCTION

On December 3, 2001, after a request from Qwest to complete its reconciliation report for Arizona before the other Qwest states, Liberty released its Report on Qwest Performance Measure Data Reconciliation for Arizona ("Arizona Report"). The pressure on Liberty to complete its Arizona Report before the reports for the other Qwest states in its region were completed was not in the public interest. In fact, subsequent events demonstrate that the rush to do the data reconciliation in Arizona unfairly prevented Liberty from discovering problems with Qwest data that were recently identified in Liberty's reconciliation for Colorado.

II. ARGUMENTS

A. Any Conclusions On the Accuracy and Reliability of Qwest's Performance Results Should Wait Until Liberty Consulting Has Completed Its More Extensive Evaluation of Performance Results for the Minnesota, Nebraska, Oregon, Utah, and Washington Data.

Since the December 13, 2001, workshop in Arizona on the Liberty Arizona data reconciliation report, Liberty has released its findings on the reconciliation of Qwest performance data for the state of Colorado.[1] Liberty's report in Colorado reached conclusions different than those it reached in the Arizona Report. Liberty found "[s]everal process errors [which] significantly affected Qwest's reported performance results."[2] Liberty also stated that it had a concern about the "number of apparent human errors that occurred in the processing of AT&T LIS trunk orders."[3] Finally, Liberty found in its analysis of the Covad data that human errors by Qwest personnel were apparently the cause of data inappropriately being included in Qwest's reported results.[4] In summary, Liberty's analysis of the Colorado data discovered many problems with Qwest's data that it did not discover in the Arizona analysis.

In the Colorado Report, Liberty attributed its conclusions that were critical of Qwest to three factors. These factors were:

1. Covad provided support information for the performance measures that were to be reconciled;
2. the scope of the AT&T reconciliation was smaller and so Liberty was able to investigate a higher percentage of orders in more depth than had been accomplished for the Arizona data; and

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[1] Second Report on Qwest Performance Measure Data Reconciliation – Colorado, dated January 3, 2001 ("Colorado Report"). For ease of reference, a copy of that report is attached hereto as Exhibit A. The ROC Observations and Qwest responses to those Observations are attached hereto as Exhibit B.
[2] Colorado Report at 4.
[3] *Id.*
[4] *Id.*

3. Liberty did not need to spend effort on issues that had been investigated in Arizona and in learning how data were stored and processed.[5]

In the Colorado Report, Liberty stated, "Qwest has indicated that there should not be differences among the states in its region as to how data are collected and processed for reporting performance measures."[6] In other words, the findings that Liberty makes in Colorado, and will make in Washington and Nebraska, should also apply to Arizona. Because of the discoveries that Liberty made in the Colorado audit, "Liberty views the results of its data reconciliation work to be cumulative and that overall conclusions should be made after its work for the states of Washington and Nebraska is complete."[7] To ensure that the Arizona Corporation Commission ("ACC") has the complete picture of Qwest's treatment of its raw data, the ACC should wait until after Liberty has published its last reconciliation report before reaching any final conclusions.

B. Liberty's Analysis of the Colorado OP-3 Commitments Met Data for LIS Trunks Calls Into Question Liberty's Arizona OP-3 Commitments Met LIS Trunk Conclusions.

In the Arizona data reconciliation effort, Liberty's analysis showed that Qwest applied a customer miss code to 72.7% of AT&T's LIS trunk orders in the period from January 2001 through May 2001.[8] What this means is that on 72.7% of the orders, Qwest missed the committed-to due date and blames the miss on the CLEC. Qwest excluded from the Performance Indicator Definition ("PID") calculations orders with Qwest-

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[5] *Id.*
[6] *Id.*
[7] *Id.* It should be noted that Liberty is also conducting data reconciliation work for results from the states of Minnesota, Oregon and Utah..
[8] Liberty Ex. 5-3.

assigned customer miss codes. For reasons that were described in AT&T's written comments on Liberty's Arizona Report, AT&T believes that, in some cases, Qwest improperly excluded orders to which Qwest applied customer miss codes.[9] Notwithstanding AT&T's arguments on whether certain orders with Qwest-assigned customer miss codes should be excluded, in the Arizona analysis and the Arizona Report, Liberty made no meaningful findings on whether Qwest properly assigned the customer miss code for LIS trunk orders in the first place. On 6% of the Arizona LIS trunk orders, Liberty concluded that Qwest coded an order as being missed for customer reasons, and AT&T coded the same orders as being missed for Qwest reasons. For that 6%, Liberty found the results were inconclusive. For the other 66.7% of the Arizona LIS Trunk orders, Liberty made no explicit finding on the appropriateness of Qwest's application of the customer miss code.

In the more in-depth analysis of the Colorado OP-3 LIS trunk data, Liberty found significant problems with how Qwest was assigning jeopardy codes and customer-miss exclusions. The Colorado Report states, "Liberty discovered instances where the Missed Function Code (MFC) applied by Qwest to an order in WFAC was inappropriate, e.g., when Qwest applied a C01 jeopardy *in cases when the jeopardy should have been to Qwest.*"[10] The net effect of Qwest's inappropriate coding of miss codes to CLEC causes is that Qwest has systematically reported results for LIS trunk that makes its performance look better than it truly is. Liberty attributed the source of the misapplication of jeopardy and Miss Function Codes to human error on the part of Qwest. In the Colorado Report, Liberty concluded that, "21 percent [of the differences between Qwest and AT&T

[9] AT&T Ex. 5-4 at 9-11, 13-15 & 17-18.
[10] Colorado Report at 5 (emphasis added).

results] were likely caused by Qwest's errors in assigning jeopardy codes and customer-miss exclusions."[11]

AT&T has always suspected that Qwest has been inappropriately and systematically blaming CLECs for missed commitments that truly were caused by Qwest. For measurement, and eventually Performance Assurance Plan ("PAP") purposes, Qwest's coding of an order that missed a commitment as a customer miss or customer jeopardy is a "get out of jail free" card. Liberty's findings independently confirm AT&T's suspicions.

Liberty's discovery in Colorado of an excessive number of orders where Qwest miscoded the jeopardy and miss code to the CLEC would apply equally to the Arizona results. Consequently, the ACC should view Qwest's OP-3 results for LIS trunks in Arizona as unreliable and not to be trusted. Until Liberty finishes its complete audit and Qwest has had the opportunity to take the appropriate corrective actions in response to the Liberty findings, the ACC should not rely upon any Qwest data for LIS trunk provisioning measurements (OP-3 Installation Commitments Met, OP-4 Installation Interval, and OP-6 Delayed Days). The facts are that Qwest classified 72.7% of the AT&T LIS trunk orders in a five month period as a customer-caused jeopardy or miss and that Liberty found Qwest has been inappropriately classifying orders as customer-caused jeopardies or misses. The only conclusion that can be reached with these facts is that Qwest's provisioning related performance data for LIS trunks should be ignored because the data are unreliable.

[11] *Id.* at 8.

C. Liberty's Analysis of the Colorado OP-4 Installation Interval Data for LIS Trunks Calls Into Question Liberty's Arizona OP-4 Installation Interval LIS Trunk Conclusions.

Liberty's analysis of Colorado OP-4 data for LIS Trunks shared many of the same findings as the OP-3 results. Qwest's errors in assigning jeopardy codes and customer-miss exclusions resulted in Qwest inappropriately excluding a significant number of orders from the OP-4 results.

In addition to findings in Colorado that Qwest was inappropriately excluding orders from OP-4 results consideration, Liberty found that Qwest was making significant errors in how it calculated intervals for the orders that it did include in the OP-4 results. Liberty found that "[o]ne third of the numerator discrepancies were caused by errors in Qwest's application date."[12] Liberty also concluded, "[t]hus, Qwest cannot always support the application times it used in developing the performance results for OP-4."[13] The application date and time is the point at which Qwest "starts the clock" for the purpose of determining how long it takes Qwest to install a service. If Qwest cannot support the point at which it "started the clock" for the OP-4 measurement, then the entirety of the OP-4 results for LIS trunks should be considered unreliable and should not be trusted.

Liberty also found that Qwest was inappropriately excluding from the calculation of the OP-4 measurement results any service order not completed within eight months.[14] Neither the Arizona nor the ROC OP-4 PID permits Qwest to exclude orders that are completed after eight months. While this situation did not occur with the AT&T orders in Arizona that were subject of the Liberty data reconciliation, it does appear that Qwest

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[12] *Id.*
[13] *Id.*
[14] *Id.* at 7.

has been systematically excluding these lengthy completion interval orders, and it is likely that this inappropriate exclusion has been applied for other CLECs or for AT&T orders in other months. This represents yet another reason why the OP-4 LIS trunk results should be considered unreliable and not to be trusted.

Finally, in the Colorado Report, Liberty found Qwest human error as the cause of invalid completion dates for orders that were excluded by Qwest. Qwest excluded 6.3% of the AT&T orders from the calculation of the OP-4 and OP-3 results because of invalid completion dates. While the Arizona PID does permit Qwest to exclude from the provisioning measurements orders with invalid completion dates, that exclusion was agreed to based upon an assertion from Qwest that the amount of such exclusions would be *de minimis*. Excluding 6.3% of the LIS trunk orders because of sloppy Qwest record keeping is hardly a *de minimis* level.

D. Liberty's Analysis of the Colorado Data for Covad Orders Demonstrates That if Liberty Had Completed its Analysis of Covad's Arizona Results, it Would Have Likely Uncovered Significant Qwest Data Accuracy Issues.

In a December 12, 2001, email from Bob Stright, Liberty indicated that, while it received information from Covad on November 29, 2001, "that would be helpful on a sample of orders," it did not consider that information in the Arizona Report and analysis. Liberty's findings in Colorado using Covad data would suggest that, had Liberty considered Covad's Arizona information, it would have found that Qwest had similarly significant problems with its Arizona data. Liberty's Colorado Report found that for OP-

4 line sharing orders, "Qwest was incorrect in 26 percent of the records."[15] Liberty also found for PO-5 results that "Qwest was incorrect in 38% of the records."[16]

For the OP-4 unbundled loop results in Colorado, Liberty found Qwest correctly reporting performance only 67% of the time. For OP-4 line sharing results in Colorado, Liberty found that Qwest correctly reported performance 61% of the time. For the PO-5 results, Liberty found that Qwest correctly reported results in Colorado only 50% of the time. These findings indicate that had Liberty completed its analysis of Covad's Arizona results, it is likely that the same type of problems would have been discovered. The only conclusion that can be reached with these facts is that Qwest's provisioning-related performance data for unbundled loops and line sharing are unreliable and should be ignored.

E. <u>Liberty's Analysis of Nebraska Trouble Ticket Information Demonstrated That Qwest is Improperly Recording Trouble Ticket Information.</u>

In its analysis of Nebraska trouble ticket information, "Liberty found that Qwest had improperly recorded the MTTR for a significant percentage of trouble tickets."[17] Liberty found this error rate to be "significant." Based upon that finding, Liberty concluded that, "[t]he reported results for MR-6 for April and June 2001 are incorrect." The specific problem that caused the excessive mean time to restore ("MTTR") intervals was an incorrect recording of the close time of the trouble ticket. While Liberty's finding was limited to the MR-6 results, an inaccurate recording of the trouble ticket close time will also affect the results for the MR-3 Out of Service Cleared within 24 hours, MR-4

[15] *Id.* at 11.
[16] *Id.* at 8.
[17] ROC Observation 1028, a copy of which is attached hereto as Exhibit C.

All Troubles Cleared within 24 hours, MR-5 All Troubles Cleared within 48 and MR-9 Repair Appointments Met PIDs.

F. Liberty Used the Wrong Standard for Performing the Audit.

Liberty stated that the goal of the audit, "was to determine whether, in consideration of the requirements of the PID, Qwest's methods, practices, or processes contained material error."[18] AT&T generally agrees with that goal. Fundamentally, the audit was to determine if Qwest's data collection processes are accurately, reliably and consistently collecting performance data that are used in the calculation of the PIDs and whether those processes are collecting and excluding performance data in a PID-compliant manner. For the data reconciliation efforts, there are two ways in which the issue of Qwest's input data accuracy could be resolved. The first way is for the CLEC to present evidence that demonstrates the Qwest data are inaccurate. The second way is for Qwest to present evidence to demonstrate that its data are accurate.

Liberty's analysis appeared to place much more of the burden on the CLEC to prove Qwest's data inaccurate. Liberty appeared to focus too little on whether Qwest had proven that its data were accurate. For example, for one AT&T LIS trunk order, Liberty's conclusion was:

> Qwest provided no information as to why they excluded this record. AT&T's ASR shows no activity that would suggest whether or not a jep. was warranted. AT&T did not provide any information that demonstrates Qwest's treatment of the order was incorrect.[19]

For the above order, Qwest excluded the order from the OP-3 calculations. Qwest provided no support as to why it excluded the order. While Liberty claimed that AT&T's

[18] Liberty Ex. 5-1 at 3.
[19] Liberty Ex. 5-3, AZ_OP-3_LIS_ATT, January 2001 Records, line no. 7.

records were not informative as to whether or not a jeopardy was warranted, in fact, AT&T provided information that shows AT&T completed its required work 1 day before the due date.[20] The information provided by AT&T for this order would support a conclusion that it was not possible for a jeopardy to have been appropriately assigned to AT&T. Notwithstanding the additional information provided by AT&T, Liberty effectively concluded that, for this order, even with a failure by Qwest to provide any information to support the exclusion, Qwest is right.

III. CONCLUSION

Liberty's findings in its analysis of the Colorado and Nebraska reconciliation efforts demonstrate clearly that any findings on the accuracy of Qwest's input data should be considered only after the data has been reconciled for *all* of the targeted states. Liberty's Colorado and Nebraska findings also demonstrate that data reconciliation remains very much a work in progress.

Although Liberty's findings generally appear favorable to Qwest in the Arizona Report, Liberty came to very different conclusions in Colorado and Nebraska when reviewing the same performance measurements and the same services. There is also the possibility that other new findings and conclusions may be reached after Liberty has completed the analysis of Minnesota, Nebraska, Oregon, Utah and Washington. Until Liberty has completed its reconciliation, there is no basis upon which this Commission may draw any conclusions about the accuracy and reliability of Qwest's data – a concept that Liberty itself has recognized.

[20] AT&T Ex. 5-4, AZ 12-3 – Review of Liberty LIS Analysis, at 2.

Liberty's Colorado and Nebraska findings have called into question the accuracy and reliability of Qwest input data. To the extent Qwest responds to the negative findings Liberty has made (and may make in the future), its responses should indicate what efforts it has taken to correct the problem and rehabilitate any data that were affected by the problem. If Qwest chooses not to rehabilitate all of the suspect data, the portion that remains suspect must be eliminated from any consideration by the ACC.

For data collection and calculation problems that Qwest does fix, Liberty should be required to verify that the fix has produced the intended effect. It would not be sufficient for Qwest's to assert that it has fixed the problem. Independent assessment of the correction of the problem is absolutely essential.

Respectfully submitted this 18th day of January 2002.

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Exhibit A

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Second Report on Qwest Performance Measure Data Reconciliation – Colorado

I. Introduction

The Liberty Consulting Group (Liberty) conducted an audit of Qwest's performance measures for the ROC, and issued the final report from that audit on September 25, 2001. As an extension to the audit, and through its Change Request process, the ROC requested that Liberty conduct a "data validation to resolve any debates concerning the accuracy of performance data emanating from particular ROC PIDs." (ROC Change Request #20.) Certain CLECs have expressed concerns about the accuracy of Qwest's reported performance results as they relate to service that they have been receiving. The ROC decided to conduct this data reconciliation work in order to test those concerns. Liberty's performance measures audit applied to all of the ROC states with the exception of Arizona. Nevertheless, Liberty was requested to include Arizona in the scope of its data reconciliation work. The report that used Arizona data was issued on December 3, 2001. This report provides the results of Liberty's review of data from Colorado.

Liberty conducted multiple discussions with state commission personnel, Qwest, and the CLECs, in order to secure their comments on the scope and objectives for this test. Liberty has determined that the objective for the data reconciliation process solicited by the ROC should be to answer the following question:

> **Does any of the information provided by the participating CLECs demonstrate inaccuracy in Qwest's reporting of performance results under the measures defined in the PID?**

The question presented is an important, but narrow one. It allowed the exclusion of activities that would have substantially expanded the scope of this test. For example, Liberty was not required to determine whether CLECs could reproduce Qwest's performance results with their own information, or what changes would be required to allow such recreation. There were also situations in which Liberty found that Qwest and a CLEC interpreted requirements differently or had different understandings of how interactions with Qwest or the information resulting from them should be treated. In those cases, Liberty did not seek to determine who was right and who was wrong, or who reflected the better practice. Instead, Liberty's goal was to determine whether, in consideration of the requirements of the PID, Qwest's methods practices, or processes contained material error. Therefore, in the case of data discrepancies, Liberty required an affirmative showing of Qwest error or omission before issuing an exception or observation. However, in order to make clear the details of its examination, Liberty has reported the cases where it found the information provided by the parties to be inconclusive. In the course of its data reconciliation work, if Liberty found something wrong with the way Qwest reported performance results, regardless of the information provided by the CLEC, Liberty reported that problem.

In its comments on CR #20, AT&T described what it thought should be the process for what has been referred to as "data reconciliation," as follows:

1. The CLEC identifies what it believes are discrepancies between performance results it has produced and the performance results that Qwest has produced. The CLEC should identify the particular performance measurement in question and the evidence that lead the CLEC to conclude that a discrepancy exists.

2. The auditor takes the CLECs information and confirms the existence of the discrepancy.

3. After confirming the discrepancy, the auditor determines and identifies the source of the discrepancy.

4. If the source of the discrepancy is the CLEC, the auditor will share its findings at a high level with the TAG. The specific details of the discrepancy shall be shared by the auditor privately with the specific CLEC.

5. If the source of a discrepancy is Qwest and that discrepancy points to some problem with Qwest's raw data, the auditor shall create an Exception/Observation per the Exception and Observation process used in the ROC OSS test. In the Exception/Observation, the auditor will make recommendations as to whether the identified deficiency is likely to affect multiple services and/or multiple CLECs. The auditor will also identify what it believes is the period of time that Qwest may have been producing questionable performance results.

6. After the Exception/Observation has been created, it should follow the normal process for closure as would any other Exception or Observation.

In general, the process described by AT&T reflected how the data reconciliation effort proceeded.

Three CLECs, Covad, WorldCom, and AT&T, chose to participate in data reconciliation. The participating CLECs had identified numerous discrepancies. In connection with this report, Liberty has separately supplied specific information about the CLECs' sources of discrepancies, as well as proprietary information concerning specific records and volumes. Liberty sought to prepare this report to inform the interested participants about the test and its results, without revealing confidential information. For example, the report generally refers to percentages of total orders instead of the actual number of orders. The specific performance measures and products that the participating CLECs wanted included in the data reconciliation, being widely known, were therefore not considered proprietary.

As a result of its data reconciliation work for the state of Colorado, Liberty has or will be issuing several Observation Reports, each of which is discussed below.

Qwest, the CLECs, and Liberty spent significant time and effort resolving the specific scope of the performance measures to be included in data reconciliation. It took considerable added effort to digest and process the information provided by CLECs and match it with data provided by Qwest. Liberty began this data reconciliation test with a significantly greater familiarity with the structure and nature of the Qwest data, with which Liberty worked extensively during earlier audit activities. Gaining a similar kind of familiarity with CLEC data structure and content formed a more significant than expected part of this test. During the course of its data reconciliation test work, Liberty was able to match a significant portion of the apparently contradictory data presented by CLECs and Qwest. This success in data matching was important, but the discrepancies remained very large even after it was completed.

II. Overall Summary of Findings

This report presents more detailed, non-confidential results in later sections that are organized by CLEC. This section provides Liberty's overall conclusions, which have been formed on the basis of the reconciliation of Colorado data.

Several process errors significantly affected Qwest's reported performance results. These problems are documented in Observation reports 1026, 1027, 1029, and 1030. Qwest reported retail line-sharing orders as wholesale orders, orders were repeated in consecutive months because of different completion codes, orders were not reported because the CLEC designation was "unknown," and records were excluded because of no state code. Qwest has indicated that it has either corrected or is investigating these matters.

While the problems discussed in the four Observation reports listed above caused reported results to not reflect actual performance, they are the type of problem that can rather easily be fixed, and at least in some cases, performance results can be re-calculated. Of more concern to Liberty because it may not be so easily corrected is the number of apparent human errors that occurred in the processing of AT&T LIS trunk orders. This matter has been reported in Observation 1031. In addition, human errors were apparently the cause of some Covad UBL orders not being excluded from OP-4 in cases where the requested interval was longer than the standard (Observation 1032), and application dates and times were incorrectly determined by Qwest personnel on AT&T LIS trunk orders (Observation 1033).

As a result of its data reconciliation work for Arizona data, Liberty found that Qwest made some errors that affected performance results. However, those errors were generally either (a) of the kind and at levels to be expected at the front end of the performance measurement process, where people must manually enter vast amounts of information, or (b) appeared to be honest errors in judgment. The amount of these errors in relation to the total amount of information required for the performance measures did not exceed what Liberty considers to be expected levels, even under a carefully operated set of measurement activities. The Arizona work also noted a programming problem associated with measure OP-15 (Exception 1046) and a failure to report a group of Firm Order Confirmations in June 2001.

For the Colorado data, there were three primary factors that drove to different conclusions. First, Covad provided support information for the performance measures that were to be reconciled. Second, the scope of the AT&T reconciliation was smaller and so Liberty was able to investigate a higher percentage of orders in more depth than had been accomplished for the Arizona data. Finally, Liberty did not need to spend effort on issues that had been investigated in Arizona and in learning about how data were stored and processed. Qwest has indicated that there should not be differences among the states in its region as to how data are collected and processed for reporting performance measures. Therefore, Liberty views the results of its data reconciliation work to be cumulative and that overall conclusions should be made after its work for the states of Washington and Nebraska is complete.

III. Results of Data Reconciliation – AT&T

A. Issues

The scope of the data reconciliation work for AT&T and Colorado was:

- The denominator of PO-5D for Local Interconnection Service (LIS) trunks.
- The numerator and denominator of OP-3, OP-4, OP-6, and OP-15 for LIS trunks.

The reconciliation period was from January 2001 through June 2001. Qwest stated, however, that it did not report CLEC-specific state results for LIS trunks for OP-15 for January or February; therefore, Liberty could not reconcile data for those months. In addition, Qwest was unable to provide the data necessary to reconcile OP-15 for LIS trunks for May; therefore, data for that month could not be reconciled.

Human Error

Liberty noticed several types of human error that caused inaccuracies in Qwest's performance measure reporting. Liberty discovered instances where the Missed Function Code *(MFC)* applied by Qwest to an order in WFAC was inappropriate, *e.g.*, when Qwest applied a C01 jeopardy in cases when the jeopardy should have been to Qwest. The MFC is entered by Qwest personnel who are supposed to choose the code that represents the reason for a miss. It is used by other Qwest personnel as one factor in determining the Service Order Miss Code *(SOMC)* in RSOR. If the SOMC is to the customer, then the order was excluded from OP-3, OP-4, and OP-6 during the period being reconciled by Liberty. Numerous orders were, in fact, inappropriately excluded from these measures because of this type of human error. This issue is the subject of Liberty's Observation report 1031.

In addition, Liberty noted instances where Qwest's completion date was 01/01/01, which meant that the completion date was blank or invalid and the order was legitimately excluded from the measure. In other cases, the application date to entry date interval was greater than 31 days, and the order was legitimately excluded from the measure. However, the underlying cause of invalid completion dates and excessive intervals is also human error on the part of Qwest personnel.

Application Date/Time

Liberty noticed instances in which Qwest personnel determined AT&T's order application date/time incorrectly. This application date/time is used in OP-4 calculations. The PID requires that LIS trunk applications received after 3 p.m. MT are to be counted as received the next day. In some instances, Qwest failed to follow this rule. In other cases, it appears that Qwest used the wrong application date because of uncertainty as to whether the application was "complete and accurate" as is required by the definition section in the PID. This issue is the subject of Liberty's Observation report 1033.

In a 12/28/01 e-mail from Qwest, Liberty learned that Qwest apparently does not always have a record of the application times for LIS trunks. It is the responsibility of the Qwest Wholesale Service Coordinator *(WSC)* to determine the correct application date by looking at the application time and following the process for writing service orders. This process includes recording the application date as the next day when the application time is after 3 p.m. MT on a LIS trunk order. This is consistent with the definition section at the end of the PID. The only times that are logged by Qwest, however, appear to be the time when the WSC enters the application date into the EXACT system and the time the most recent application/supplement was received from AT&T. These times need not be the same time as the application time. Thus, Qwest cannot always support the application times it used in developing the performance results for OP-4.

Service Order Completion Date

For LIS trunks, Liberty found that Qwest and AT&T have different operational definitions of when an order is considered to be completed. In most instances, AT&T views the order as completed earlier than Qwest does. AT&T believes the order is completed when a first test is done, but Qwest does not consider it completed until an additional test is completed as well. For many orders a due date is established, *i.e.*, the date by which both parties expect to complete the order. When a test is successfully completed on that due date, AT&T considers the order completed. AT&T therefore includes the order in the relevant performance measures as completed on the date of that test. However, Qwest believes another test is necessary, *i.e.*, a test for which AT&T is often not ready on the due date. Accordingly, Qwest classifies the order completion as having been missed for customer reasons, and therefore excludes it from many measure results. This disagreement about the meaning of order completion accounts some of the discrepancies between the parties. For example, it accounts for seven of the discrepancies between the parties for LIS trunks for OP-4 for the months of January to June in Colorado.

Both AT&T and Qwest have reasonable justifications for their definitions of order completion. Their difference is an operational one, which cannot be resolved in either party's favor by referring to the language of the PID. Liberty did not consider this test as including a Liberty determination of which company applied the better or most correct operational interpretation. Rather, Liberty sought to determine whether Qwest's approach was out of conformity with the PID. Liberty concluded that Qwest's definition and use of a service order completion date could not be judged to be out of conformance with the PID.

Data Processing Error

Liberty's analysis of LIS trunks disclosed that many orders being reported in OP-15 did not appear to be Qwest "misses," even according to Qwest's own data. The cause of the problem was a data transfer error. The Detailed Data Set that Qwest uses for the OP-15 measure incorporates data from the Integrated Data Repository *(IDR)* Pending data source. One extremely important piece of this data is the miss code, which determines whether the order will be included in OP-15, and whether it will be included in OP-15A or OP-15B. LIS trunks constitute a designed service; therefore, they have three-digit miss codes. Misses for customer reasons begin with the letter "C." For example, C01 is the miss code for the category of "Customer Not Ready." During the data transfer step, the third digit of the miss code was often (although not always) being truncated. The Wholesale Regulatory Reporting program looks up the code in a miss code table in order to determine how the order should be handled. If it fails to find the code, it establishes Qwest as the default cause of the miss. Therefore, all of the LIS trunk orders showing two digit miss codes were being reported as Qwest misses, even though not all of them were. Qwest has stated that it knew about the problem, and has already fixed it, but the performance reports for the months being reconciled, and the data provided by Qwest that generated them, contained this error. Liberty issued an Exception Report 1046 addressing this issue. The problem occurred in four of the LIS trunk service orders.

This problem could exist (for the period being reconciled) for designed services other than LIS Trunks. Accordingly, an investigation would be appropriate to determine exactly the full range of products affected, and the months involved.

Use of Reference Date

Several performance measures use the number of orders completed in the reporting period as the denominator. Qwest's service order database does not contain a real-time picture of service order activity. Liberty's review during the performance measures audit showed that records are updated close to the time of the activity involved, such as completion; however, there is usually a lag of a couple of days. If the performance measures used only the report month, Qwest could miss a substantial amount of activity. Qwest solved this potential problem by calculating measures for records in which the database reference date is the reporting month. This method helps ensure that all records are reported, but may cause orders that are completed in one month to be reported in a later calendar month. Liberty does not consider this problem to be a material one, because:

- Every order is eventually accounted for
- The process is well-defined and applied consistently
- The overall impact (including an order in a future month's performance report) is minimal.

However, a CLEC would not know the reference date; it would only know the actual date of completion. The reference date matter accounted for about 15 percent of the LIS Trunk discrepancies for OP-3 for the months of January to June 2001. This reference date issue affects all products.

Lengthy Completion Intervals

In response to data request 30-2, Qwest told Liberty that it is unable to include in its performance reporting any service orders that are not completed within eight months. This problem accounted for six percent of the discrepancies in both OP-3 and OP-4 for LIS trunks for the months of January to June in Colorado.

B. Reconciliation Results

For the measure OP-3, Qwest and AT&T agreed on 47 percent of the orders. For the orders that the companies disagreed on, Liberty found that:

- 21 percent were likely caused by Qwest's errors in assigning jeopardy codes and customer-miss exclusions. In addition, another 9 percent of the orders contained a 01/01/01 completion date, which meant that Qwest's program properly excluded the orders but that there was likely human error in failing to enter a correct completion date. (Observation 1031.)
- 6 percent were not counted by Qwest because the order took more than eight months to complete.
- For 61 percent, Qwest's treatment was correct, or Qwest followed its procedures for not counting orders with a customer miss. In a quarter of these cases, the discrepancy was caused by Qwest using the reference date to report order completion. In 40 percent of these cases, the discrepancy was caused by disagreement as to when a LIS trunk order completes.
- 12 percent of the discrepancies contained conflicting information that Liberty was unable to resolve.

For measure OP-4, the base results are the same as those presented above for OP-3. In addition, however, the companies disagreed on most of the interval numerator values in cases where they agreed that the order should be included. For many of the numerator discrepancies, Liberty was not given information that resolved the conflict. In some cases, Liberty determined that Qwest correctly determined the numerator for OP-4 and AT&T did not. One-third of the numerator discrepancies were caused by errors in Qwest's application date. (Observation 1033.)

For measure OP-6, Liberty found that there was no actual disagreement in 37 percent of the orders, Qwest was incorrect on 27 percent of the orders for the same reasons given in the OP-3 analysis, Qwest was correct in 18 percent of the discrepancies, and 18 percent remained in conflict.

For the few orders that could be analyzed for measure OP-15, Liberty found that there was no actual disagreement in 24 percent of the records, Qwest was incorrect on 29 percent of the records, Qwest was correct on 29 percent of the records, and 18 percent remained in conflict. All but one of the Qwest errors related to the data processing problem that was the subject of Exception 1046. The other case was one in which Qwest's documentation did not support its position that an order was pending for Qwest reasons.

For PO-5, Qwest and AT&T agreed on 86 percent of the orders. Qwest was in error on 25 percent of the discrepancies, Qwest was correct on 25 percent, and 50 percent of the discrepancies could not be resolved with the available information.

IV. Results of Data Reconciliation – WorldCom

Liberty's scope of work associated with WorldCom (WCom) and Colorado included OP-3, Installation Commitments Met, and OP-4, Installation Interval, for LIS trunks and 2-wire unbundled analog loops. The time period under consideration was January through May 2001. The data provided by WCom did not contain sufficient information to calculate the OP-4 numerator, which is the actual installation interval. The UBL denominator for OP-4 excludes orders with customer-requested due dates that are greater than the standard interval. WCom could only determine these excluded orders on a limited basis. Therefore, Liberty sought to determine whether WCom's information on the total order counts showed any problems with the numbers reported by Qwest for OP-3 and OP-4.

For LIS trunks, Liberty found that Qwest and WCom agreed on the treatment of 7 percent of the orders. After receiving additional information from WCom, the companies agreed on another 9 percent of the orders. In 24 percent of the orders, Qwest excluded the record because of a customer miss. WCom information either confirmed the customer miss or did not provide any information to make Liberty think that Qwest was incorrect in making such an assignment. However, Liberty did not have the information that would have been required to find the same type of human error problems noted above in the AT&T section of this report. Often jobs have more than one service order with one being the actual installation and another being an administrative record. Qwest excluded such records that have no inward activity and WCom often included that order. This situation accounted for 24 percent on the total records. Sometimes Qwest will report an order that was completed in one month in the next month's results because of the database reference date. (Refer to the discussion in the AT&T section above.) This accounted for 7 percent of the total records. Finally, there were orders could not be reconciled because WCom lacked either a PON or a Qwest service order number, and Qwest was unable to trace the other information that WCom provided to an actual order. Initially, this accounted for 29 percent of the orders. Later, Qwest was able to find that several of these orders had been completed at various dates in the year 2000, not in the 2001 months that were under examination. This brought the total down to 21 percent, and, while still a significant percentage, should not be a major concern given the quality of the CLEC-provided information.

For unbundled loops, the companies initially agreed on 31 percent of the orders. After additional information was obtained from WorldCom, the orders for which the parties agreed increased to 62 percent. Qwest excluded the remaining orders for customer-caused miss reasons or had dates outside the period of the reconciliation. The information available from WCom did not dispute Qwest's information.

On December 19, 2001, Liberty sent detailed and proprietary worksheets to WCom and Qwest on the analysis of OP-3/4.

V. Results of Data Reconciliation – Covad

A. Issues

The agreed upon scope of the data reconciliation for Covad was a 25 percent sample of OP-4 (installation interval) for line-sharing and unbundled loops and of PO-5 (Firm Order Confirmations on time). Liberty chose the sample and received Covad's agreement of the method of drawing the sample. The time period for the review was the months of May, June, and July 2001.

Liberty found several problems with Qwest's performance reporting for Covad. First, Qwest reported some retail orders as wholesale. For line sharing, Qwest may generate two orders, one for the CLEC data side and another to account for Qwest's voice service. At least some of the orders of the second type were incorrectly reported as wholesale orders associated with the CLEC. Liberty documented this problem in Observation 1026. In response to the Observation, Qwest said that it had implemented a code change that looks orders that contain billing USOCs for line sharing and reviews all line-level USOCs to identify those with retail activity and excludes them from the results. Qwest said that this change would prevent future reporting of the retail orders as line sharing activity and effectively reduce volumes previously shown. For July 2001, Liberty found that this problem affected 5 percent of the sampled number of discrepant records that Liberty reviewed. Qwest indicated that the revised code would be executed on historical data starting from January 2001 and be reported with performance results that include December 2001.

Liberty also found that Qwest reported some of the same items in two consecutive months. This problem was documented in Observation 1027 and for Covad affected both UBL and line-sharing orders. While Liberty has not received Qwest's formal response to the Observation, Qwest has indicated that this problem was known and has been corrected. Qwest indicated that the problem had to do with different completion status codes given to some orders and that the effect was minimal. However, for the UBL records, this problem accounted for 22 percent of the sampled number of discrepant records that Liberty reviewed.

Liberty found that some line-sharing orders were not reported by Qwest because the CLEC was designated as unknown. This problem was documented in Observation 1029. Qwest's records confirmed the application and completion dates on these orders with the data provided by Covad. However, Qwest could not report the orders because the CLEC designation was not assigned correctly. This problem affected 70 percent of the orders that Liberty reviewed and that were in the category of included by Covad but not by Qwest in the reporting of July line-sharing results for OP-4.

Covad's information provided to Liberty for data reconciliation included many orders that Qwest did not report for PO-5. Investigation of these orders revealed that Qwest's program had excluded them because of an invalid or missing state code. There was nothing apparently wrong with Covad's orders. This problem accounted for about two-thirds of the items that Liberty reviewed and that were the category of included by Covad but not by Qwest in the reporting of July PO-5 results. This matter was documented in Observation 1030.

Qwest included some unbundled loop orders that should have been excluded because the requested provisioning interval was greater than the then current standard installation interval. This problem, which appears to be one involving human error, was documented in Observation 1032.

B. Results

Liberty prepared spreadsheets showing the results of its analysis of the Covad service orders for May, June, and July 2001. These documents contain information that is proprietary to Covad; therefore, Liberty made a limited distribution of them.

For OP-4 and unbundled loops, the companies agreed on only 16 percent of the orders. For another 8 percent of the orders, the companies agreed on inclusion in the denominator of the measure but disagreed on the interval for the numerator. Liberty sampled the 84 percent of the orders for which there was disagreement and found for those discrepancies that:

- Qwest was incorrect on 31 percent of the discrepancies. Most of these (22 percent) were reported incorrectly for the second time by Qwest (Observation 1027). Qwest also included orders (about 6 percent) that should have been excluded because the requested interval was longer than the standard (Observation 1032).
- For 61 percent of the discrepancies, Qwest correctly reported performance and Covad's information supported the way in which Qwest treated the orders. For example, in several cases Covad did not take into account the 4th of July holiday when counting interval days. In other cases, Liberty found nothing wrong with Qwest's reporting and Covad's information did not show otherwise. In some of the records, there turned out to be no real discrepancy other than Covad included the order in the wrong month.
- For 8 percent of the records, the information was either conflicting or Liberty was unable to determine which company was correct.

For OP-4 and line-sharing orders in June and July, the companies agreed on only about 14 percent of the orders. For another 30 percent of the orders, the companies agreed on inclusion in the denominator of the measure but disagreed on the interval for the numerator. Liberty sampled the 86 percent of the orders for June and July and for which there was disagreement and found for those discrepancies that:

- Qwest was incorrect in 26 percent of the records. Retail line-sharing orders reported incorrectly by Qwest (Observation 1026). Qwest incorrectly reported orders in two separate months (Observation 1027). Qwest excluded orders because the CLEC designation was "unknown" (Observation 1029).
- In 55 percent of the records, Qwest was correct or Covad did not provide any information to show otherwise.

- In 19 percent of the records there was conflicting information that Liberty was unable to resolve. Many of these were cases in which the parties disagreed by one day on either the application or completion dates.

For PO-5, the companies agreed on only about 10 percent of the orders. Liberty sampled the 90 percent of the orders for which there was disagreement. For June and July, Liberty found for those discrepancies that:

- Qwest was incorrect in 38 percent of the records. Most all of these were excluded by Qwest because of the problem with the state code (Observation 1030). There were some (PO-5C) fax orders that were not included in the data provided to Liberty, although Qwest claimed that these orders were accounted for.
- Qwest was correct or Covad did not provide any information to show otherwise for 44 percent of the records.
- 18 percent showed conflicting information that Liberty was unable to resolve.

Exhibit B

Exhibit B-1

DATE: January 11, 2001
To: ROC TAG

FROM: Bob Stright
The Liberty Consulting Group

RE: Qwest's Response to Observation 1026

Summary

Observation 1026 identified retail orders that were being included in performance reports as wholesale order. Qwest acknowledged that RRS was including orders that appeared to be retail in their wholesale performance results. Qwest indicated that in the process of provisioning a line-sharing order, a separate retail and wholesale order has to be issued by Qwest. The wholesale order is being correctly included in the RRS calculations. However, because there was no retail line sharing the second order was being defaulted into the wholesale category resulting in a double count. Qwest has implemented a code change to look for each "N" and "C" orders that contain billing USOCs with retail activity and will exclude retail orders from the measure. Qwest believes that this action will prevent the reporting of retail orders as Line Sharing activity. The code changes were implemented effective with the 11-01 release of the Performance Results. The initial revisions will be made to the 7-01 to 10-01 time period. Additional revisions will be made with the 12-01 release of the 1-01 to the 12- 01 report in January 2002.

Discussion

Qwest has provided RSOR files that contain the orders identified by Liberty that were affected by this observation. Liberty has reviewed these RSOR files and they indicate that the appropriate changes were made. However, Liberty has requested that Qwest provide the complete RSOR data files for the Covad-Colorado 2001 line-sharing for the months of April, May, June, and July for re-auditing to determine if the double counting problem has been cured. Liberty will report back to the ROC-TAG when this review is complete.

DATE: January 11, 2001

To: ROC TAG

FROM: Bob Stright
The Liberty Consulting Group

RE: Qwest's Response to Observation 1027

Summary

Observation 1027 identified various orders that were included and counted in more than one month. Qwest acknowledged the problem and indicated that it occurred when an order was completed in one month and past through completions again in a second month. If an order was passed through with a completed status (CP) in one month and goes through a second completion as a billing post (PP) in another month then it was double counted. Qwest has implemented new code that reviews the record for the previous seven months and if the record has been previously counted then it is omitted from the current month's calculations.

Qwest has run queries to ensure that the duplicate orders identified by Liberty in the May and July RRS results are no longer included. Liberty has reviewed the table included in this response and will perform additional analyses before closing this observation. Liberty has requested 2001 RSOR UBL Covad-Colorado data sets for the months of April, May, June, and July to determine if the code changes properly exclude the duplicate orders. Liberty will report back to the ROC-TAG when this review is complete.

Exhibit B-3

DATE:January 11, 2001

To: ROC TAG

FROM: Bob Stright
The Liberty Consulting Group

RE: Qwest's Response to Observation 1029

Summary

Observation 1029 noted the exclusion of certain CLEC line sharing orders because the CLEC was unknown. Qwest acknowledged that it was unable to report the majority of line sharing orders in the months of July and going forward for certain CLECs. Qwest indicated that its order writing process did not contain the detail associated with the field used to identify CLECs. Thus, Qwest was not able to report Line Sharing results for the majority of the orders at the CLEC specific level for this time period. Beginning with the 12-01 data and going forward a new detail field will be provided by PANS that should address this problem. Qwest indicated for the interim period from 7-01 to 11-01, a "work around" solution has been implemented. The code change will be reflected in the RRS performance report 1-01 to 12-01.

Liberty believes that Qwest's solutions (interim and permanent) will permit it to properly identify CLECs and related orders for the periods identified and will provide proper reporting. Liberty will request and review the changes to the field details that provide the required information and will report back to the ROC-TAG when that review is complete.

Exhibit B-4

MEMORANDUM

DATE: January 11, 2002

TO: ROC TAG

FROM: Bob Stright
The Liberty Consulting Group

RE: Qwest's Response to Exception 1046

Exception 1046 stated that, during the period being covered by Liberty's data reconciliation, Qwest's systems sometimes truncated the third digit of an order's missed function code while it was being transferred from the Integrated Data Repository Pending data source to the Detailed Data Set used by RRS to calculate OP-15 performance measure results. The Wholesale Regulatory Reporting program looks up the code in a miss code table to determine how the order should be handled. If it fails to find the code, it defaults the miss to Qwest. Thus, all of the LIS trunk orders showing two digit miss codes were being reported as Qwest misses, even though not all of them were.

In its response to the exception, Qwest stated that it had already identified the problem and that the code was corrected in the 8/01 release of performance results effective with the 1/01 – 7/01 data and going forward. Qwest also stated that the problem affected all results produced for OP-15A and OP-15B on all designed service products for the period of 1/01 – 7/01. Qwest attached a document listing the number of affected orders for all but one of the months from January to July 2001. These data show that between 2 percent and 68 percent of the orders excluded because they appeared to be company-caused misses had 2-digit miss codes. Of course, only those orders whose missed function codes began with the letter "C" were excluded in error. Liberty has submitted data requests to assess Qwest's correction of the problem and will report back to the ROC-TAG when the

ROC Observation & Exception Formal Response

Test Vendor ID:	OBS 1030
Qwest Internal Tracking ID:	TI 794
Observation/Exception Title:	FOC State Code Issue
Test Type/Domain:	Data Reconciliation
Date Qwest Received:	01/02/2002
Initial Response Date:	01/11/2002

Test Incident Summary:

An observation has been identified as a result of the data reconciliation work for Colorado and the PO-5 measure.

Observation:
Qwest failed to report many Firm Order Confirmations for Covad because it did not correctly recognize the state code from the orders.

Background:
Qwest does not report records in cases where it is unable to match the record with a known state code.

Issue:
Covad's information provided to Liberty for data reconciliation included many orders that Qwest did not report for PO-5. Investigation of these orders revealed that Qwest's program had excluded them because of an invalid or missing state code. There was nothing apparently wrong with Covad's orders. Liberty has not completed the data reconciliation of other months and so the extent of this problem is not known.

Impact:
PO-5 for July 2001 did not reflect actual performance associated the timeliness of Firm Order Confirmations.

Qwest Formal Response

Qwest acknowledges that a very small percentage of transactions were not recorded in CRM in July 2001 because IMA was unable to auto-log the state codes for these transactions. Because these transactions were not recorded in CRM, they were not included in Qwest's PO-5 performance reporting. Nonetheless, because the omitted transactions represented only 1% of all PO-5 transactions, and because including these omitted transactions actually improves Qwest's July 2001 PO-5 performance, Qwest believes that its July 2001 PO-5 results did reflect actual performance.

This issue was largely caused by a code break in EDI 6.0 related to Unbundled Loop processing, which in certain situations rendered EDI unable to auto-log the state code for a transaction. By running an ad-hoc report, Qwest determined that for July 2001 this issue impacted 562 PO-5 transactions, region-wide, which is less than 1% of the 90,777 total PO-5 transactions that Qwest reported in July 2001. Qwest met the applicable PO-5 FOC timeliness standard for 561 of the 562 transactions (99.8%) omitted due to this auto-log issue. Including these 562 transactions with the original reported 90,777 transactions would therefore actually improve Qwest's originally reported PO-5 performance. With the movement of customers off of EDI 6.0 in August and September, and with the eventual retirement of EDI 6.0 in December 2001, this issue has been virtually eliminated; there remain a handful of omitted transactions each month. In

September 2001, for instance, only 3 PO-5 eligible LSRs were omitted from Qwest's reported results, which totaled 80,098transactions. 5 transactions were omitted in October out of 104,416, and 11 out of 100,726 in November. While the omission of only a few transactions out of tens of thousands would likely not impact Qwest's PO-5 results one way or the other, Qwest will nonetheless implement a new process to ensure that all PO-5 eligible transactions are recorded in CRM. By the 3rd of each month Qwest will run an Ad Hoc report listing those few transactions that were not auto-logged to CRM due to missing or invalid state codes. Qwest SDCs will use this report to manually populate the state code for these transactions, to ensure that they are captured in CRM and reported in PO-5.

Attachment(s): None

OBSERVATION 1031
Qwest OSS Evaluation

Date: January 3, 2002

OBSERVATION REPORT

An observation has been identified as a result of the data reconciliation activities associated with AT&T in Colorado. This observation relates to performance reporting processes as they existed during the period of data reconciliation.

Exception:

The Service Order Miss Code *(SOMC)* in the RSOR data for some orders is incorrect, leading to errors in performance measurement reporting.

Background:

Service orders in WFAC can be given various jeopardy codes. Codes beginning with the letter "C" attribute jeopardies to the customer, while codes beginning with other letters do not. As stated in the response to Liberty data request 27-1, which is *Qwest's Jeopardy Coding Job Aid*:

> *A Jeopardy Code is posted when a critical date function in the provisioning process is determined to be in danger of not being completed on time. Only those critical dates, which will be missed, are to be populated with a jeopardy code.*
>
> *A Missed Function Code/MFC is posted when a due date is missed. All missed due dates must have a MFC posted. MFC's represent the root cause for the missed due date, it may be the same as a jeopardy posted during the provisioning process. Accurate notes during the provisioning process should tell the story enabling the CCT-I knowledge to post the appropriate MFC. If a DD is missed and if at anytime in the provisioning process a Qwest jeopardy code was posted the company is required to take the miss. If an order was missed for Qwest reasons and when attempt to recommit we find the customer is not ready a Qwest MFC must be posted on the DD.*

Qwest stated in a supplemental response to data request 30-4 that:

> *A WIMFC (Missed Function Code) is placed on the order by a CCT-Implementor tester at the time that the OSSOI is closed out. The MFC is the jeopardy code that best explains why the order was missed (the root cause jeopardy if more than one jeopardy was issued). This is after the order is worked and accepted by the customer. It is not input automatically. It does not vary by state or product.*

As noted in the RRS Technical Documentation, Chapter 12, the SOMC field contains the Missed Code (original). The SOMC is determined by personnel in the order completion group. As Qwest stated in its supplemental response to data request 30-4:

> *In the case of a missed due date, the RSOR SOMC field is also manually input by the SDC in the order completion group. The process is for them to look up the order in WFAC and determine the correct root cause for an order being missed.*

Thus, the Service Delivery Coordinator (SDC) reviews the WFAC file, including the MFC, jeopardy codes, and other data, and then determines the appropriate SOMC for the order. If the chosen SOMC contains a jeopardy to the customer (a jeopardy beginning with the letter "C"), Qwest excludes the order from OP-3, OP-4, and OP-6 as an order whose due date was missed for customer reasons.

However, in a subsequent document (its supplemental response to data request 37-4), Qwest revised its explanation of how the SOMC is determined. It stated that:

> *The process is for the SDC in the order completion group to determine the overall root cause for an order being missed. Since the reason for misses for the vast majority of orders occur after the RID date (release of the order for installation – the start of the WFAC record), the primary source of data for an entry for SOMC is the WFAC WIMFC field. However, this is an example of an order with problems prior to the RID. This led the SDC to use the overall history of the order to assign the SOMC.....*

Thus, the reason for the SOMC is usually, but not always, found in the WFAC file.

Issue:

Liberty has noted several different types of anomalies regarding the information in WFAC, the SOMC, and how they are used in performance measure reporting. One issue relates to Qwest assigning a customer jeopardy, *e.g.*, C01, to an order after the due date, but still excluding the order from OP-3, OP-4, and OP-6 because of a customer miss of that due date, *i.e.*, an unjustified exclusion. An example of this issue occurs with PON DENP0100530, orders C80615604, 05. According to Qwest, these orders had a due date of 1/16/01 (to confirm this due date, see the SODD in LIB_DR_Set_30-9.csv provided to Liberty in the response to data request 30-9). The WFAC record for these orders (also provided to Liberty in the response to 30-9 and named LIB Set30Req009ConAttA) shows a jeopardy of C01 to AT&T issued on 2/21/01. The RSOR data for these orders have SOMCs of C01. Thus, the orders were excluded from the OP-3, OP-4, and OP-6 measures, apparently because of a jeopardy that Qwest made to AT&T long after the due date. In data request 37-1, Liberty asked Qwest to explain how a C01 jeopardy long after the original due date caused Qwest to exclude the order from the measures, but Qwest's response was inadequate. That response did, however, state that Qwest "could not find" an original due date of 1/16/01, even though the RSOR data supplied to Liberty by Qwest contained that due date. In a supplemental response received on 1/3/01, Qwest neither answered the original question of why it excluded the order, nor did it explain why RSOR had an original due date that Qwest "could not find." Another example is PON DENP0005804, orders C80034531, 32 which had a due date of 11/22/00. Qwest jeopardized these orders C01 to AT&T on 11/27. The MFC was C01 and Qwest therefore excluded the order from the performance measure because of an alleged customer miss. In data request 37-3, Liberty asked Qwest to explain these issues and justify excluding these orders. Qwest's supplemental response stated that the jeopardy should have been posted on 11/16 (before the due date of 11/22) but human error caused it to be posted on 11/27. Liberty concludes that the Qwest log for this order is unreliable. (This is not the only case of Qwest posting jeopardies late; in a supplemental response to data request 37-5, Qwest agrees that it posted a customer jeopardy late for PON DENP0006673-A, order C80629401.)

A second issue relates to the Service Order Miss Code (SOMC) in the RSOR data set not being supported. This is important because an SOMC to the customer causes the order to be excluded from OP-3, OP-4, and OP-6. PON DENP0100467, orders C40141516, 17 is an example. The RSOR data for these orders (received in file LIB_DR_Set_30-7.csv in response to data request 30-7) have SOMCs of C01, even though the WFAC data (received in file LIBSet30Req.007ConAttA.doc also in response to data request 30-7) does not appear to have any MFC at all, and there does not appear to be a customer jeopardy of any kind in the WFAC file for these orders. Nonetheless, this order was excluded from OP-3, OP-4 and OP-6 by Qwest for a customer-caused miss. Liberty asked Qwest to explain this issue in data request 37-4, but Qwest's response was inadequate. In a supplement to that response, Qwest stated that the order had actually been jeopardized to Qwest, that it had never been jeopardized to AT&T, and that human error caused an incorrect SOMC of C01 rather than an SOMC of K09 (which Qwest now believes would have been proper).

The final issue relates to the MFC being inconsistent with the underlying jeopardies and Qwest's procedures. This is particularly important when an order has more than one jeopardy, *e.g.*, if it has one jeopardy to Qwest and another one to the customer. As described in the quote above (taken from Qwest's *Jeopardy Coding Job Aid)*, Qwest's procedure states that Qwest should take the miss whenever a due date is missed and a jeopardy is posted to Qwest any time during the provisioning process. However, Qwest's response to data request 32-6 essentially states that this did not happen during the period being reconciled. During that period, Qwest states that a record would be excluded from OP-3, OP-4, and OP-6 due to a customer-caused miss even if there also was a jeopardy to Qwest. In essence, Qwest is saying that, for the period in question, the MFC was supposed to identify the cause of a missed original due date, independent of any other jeopardies. An example of this issue is PON DENP0006628, order C80056544, which had a due date of 1/3/01. Qwest jeopardized this order E14 to itself on 1/3, the due date. It also jeopardized the order to AT&T on 1/4 with a code of C01. Nevertheless, the MFC on the order was C01 and Qwest excluded the order from the measures. Qwest's supplemental response to data request 30-4 stated that the MFC code should have been

E14; human error on the part of the tester resulted in a MFC of C01. In that same response, Qwest noted that the MFC is always input manually for all states and products, and that the SOMC in RSOR is also manually input, but by the SDC in the order completion group. In this example, the SDC also committed an error by failing to post the SOMC as E14; this resulted in the order being excluded improperly from the measure.

Impact:

During the period being considered for data reconciliation, some orders that should have been included in OP-3, OP-4, and OP-6 were being inappropriately excluded for customer-caused misses that did not really occur.

OBSERVATION 1032

Qwest OSS Evaluation

Date: January 3, 2002

OBSERVATION REPORT

An observation has been identified as a result of the data reconciliation work for Colorado and the OP-4 measure.

Observation:

Qwest included some unbundled loop orders that should have been excluded because the requested provisioning interval was greater than the then current standard installation interval.

Background:

The PID version 3.0, which applies to the data reconciliation, indicates that for OP-4, orders are excluded when the "customer requested due dates greater than the current standard interval."

Issue:

The installation guide interval indicated that the standard was five business days for loop orders with 1 to 8 lines. There were several Covad UBL orders, which had 8 lines or less, for which the requested interval was 6 business days or more, yet Qwest reported the order. This appears to be caused by human error in completing the order information that is then used for performance reporting.

Impact:

Reporting of OP-4 for May through July 2001 did not conform to the PID.

MEMORANDUM

DATE: January 14, 2002

TO: ROC TAG

FROM: Bob Stright
The Liberty Consulting Group

RE: Qwest's Response to Observation 1033

Observation 1033 stated that, during the period being covered by Liberty's data reconciliation, there were instances where Qwest personnel determined AT&T's order application date/time incorrectly for OP-4 LIS trunk performance measurement reporting purposes. In some instances, Qwest failed to change the application day to the next day, even though the ASR was received after 3:00 p.m. MT. In other cases, it appears that Qwest used the wrong application date because of uncertainty as to whether or not the application was "complete and accurate" as is required in the definition section of the PID.

In its response to the exception, Qwest stated that the net effect of its errors was minimal, i.e., a one day difference during the period being reconciled. Liberty believes it is pure coincidence, and irrelevant, that Qwest's errors may net out to a small number for the period. The important fact is that Qwest committed human errors in a third of the LIS trunk orders for which the parties agreed on the denominator but not the numerator. Liberty has submitted data requests to assess Qwest's retraining activities.

In addition, Liberty determined that for several Covad UBL orders in Arizona received after 7 pm were dated the same day, rather than the next day in accordance with the PID.

	UBL AZ Covad PON	Qwest Order #
May		
	1064663	N50411873
	1046895	N50406160
	1045828	N50426097
	1078413	N50438753
	1040680	N50429353
	1041602	N50409227
	1051520	N50429347
	1051871	N51160193
June		
	1103340	N51490676
	1121507	N54292590
	1129409	N54588152
	1105912	N52783852

July

1129409	N54588152
1137911	N55456904
1121507	N54292590
1171576	N57067207

Exhibit C

MEMORANDUM

DATE: 10 December 2002

TO: ROC TAG

FROM: Bob Stright
The Liberty Consulting Group

RE: Reply to Qwest's Response to Observation 1028

Summary

Qwest acknowledged the problems identified in the Observation report, however it considered the errors in mean-time-to-repair (MTTR) cited in the Observation to be isolated cases. Qwest proposed no new action, and instead stated that it would continue to conduct semi-annual compliance reviews and continue its random review/coaching program for technicians.

Liberty believes that the errors it found during the AT&T trouble ticket analysis in Arizona and Nebraska may be typical, rather than isolated, examples of errors. Liberty found significant indications of two types of errors, the cumulative effect of which may be unreliable historical MR-6 results.

Discussion

Observation 1028 reported that there was a significant error rate in the MTTRs, or repair durations, used by Qwest in calculating its MR-6 measure for AT&T in Nebraska. Liberty specifically discussed three trouble tickets in the report, which translated into an error rate of roughly 15 percent based on the total number of Nebraska tickets examined. Qwest acknowledged in its response that the mistakes were due to human error, but considered these errors to be isolated instances. Qwest added that it conducted semi-annual compliance reviews in all five of its Design Service centers, routinely finding error rates of less than 1 percent. Qwest also noted that its center managers conduct random checks of trouble tickets on a weekly and monthly basis, and provide coaching whenever discrepancies are discovered.

In the course of its review of AT&T trouble tickets for the April through June 2001 period for Arizona and Nebraska, Liberty reviewed with Qwest log information on repair duration for 42 tickets. Qwest found sizeable errors in the MTTR in four of them, an error rate of nearly 10 percent. Also as part of its analysis, Liberty reviewed instances in which AT&T tickets had been assigned multiple Qwest trouble ticket numbers. Liberty reviewed with Qwest 120 AT&T trouble tickets from these two states, specifically focusing on whether individual tickets were or were not included in the MR-6 measure. Qwest found probable human errors in at least four tickets (roughly 3 percent), whereby the code assigned to the ticket by its technicians precluded it from being included in the measure.[1]

Liberty believes that the routine reviews and training are positive steps. At this point, however, Liberty cannot ascertain whether such training and review programs have been effective, nor whether they were designed to capture the types of errors found during the audit. Further investigation is warranted to determine whether Qwest's proclaimed 1 percent error rate is accurate. Similarly, Liberty's analysis may have been based on too small a sample to provide a reliable estimate of error rate. Liberty therefore suggests two areas for further action:

1. Qwest should provide further information to Liberty on its semi-annual compliance reviews and its ad hoc review/coaching programs, including plans, scope, results and follow-up.
2. Liberty will expedite the reconciliation review of AT&T trouble tickets in Oregon, which would provide additional data on the nature and frequency of errors.

Liberty will inform the ROC-TAG when its review of the above two items is complete.

[1] Specifically, if a trouble ticket were closed to, for example, a customer premise equipment (CPE) code, it would correctly not be included in the measure. In these four cases, Qwest reviewed its logs and found that some repair work had been done on each ticket, so the trouble code assigned was in error. In each case, the trouble ticket should have been included in the measure but was not.

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T's Brief on Liberty Data Reconciliation Report** in Docket No. T-00000A-97-0238 were sent by overnight delivery on January 18, 2002 to:

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