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BEFORE THE ARIZONA CORPORATION COMMISSION

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ARIZONA CORPORATION COMMISSION  
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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

QWEST'S BRIEF REGARDING  
CHANGE MANAGEMENT

Qwest Corporation submits this brief regarding change management issues and its collaboration with CLECs to redesign Qwest's Change Management Process ("CMP").

**I. INTRODUCTION**

After eight months of extensive collaboration, Qwest and the CLEC community have reached agreement on virtually all aspects of Qwest's CMP that applies to Qwest's operations support systems ("OSS" or "systems").<sup>1</sup> Qwest and the CLECs have reached impasse on one issue, which is described below.

Qwest's CMP, as implemented for agreements made in the CMP redesign, clearly meets the standards set by the Federal Communications Commission ("FCC") for change management. Qwest's redesigned CMP provides CLECs as much opportunity for input, participation, and control as any other ILEC's change management process, including the

<sup>1</sup> Qwest has established a web site where it has posted the redesign meeting minutes and other materials. The web site address is [www.qwest.com/wholesale/cmp/redesign.html](http://www.qwest.com/wholesale/cmp/redesign.html).

ability to prioritize Qwest-initiated systems change requests. The scope of Qwest's CMP is as broad as any other ILEC – Qwest's CMP includes all aspects of the business relationship between CLECs and Qwest.

Qwest has fully implemented the redesigned process. Because Qwest implemented agreements arising from in the redesign meetings as they were reached, the majority of the process has been in place for some time. The sole impasse issue relates to prioritization of regulatory changes. Despite the fact that this issue has not been resolved, Qwest has implemented a new process allowing CLECs to prioritize Qwest-initiated changes. Thus, CLECs are already prioritizing Qwest-initiated change requests.

As demonstrated below, Qwest's CMP satisfies each of the factors considered by the FCC in evaluating Checklist Item 2 compliance. Thus, Qwest meets the requirements of Section 271 because it provides nondiscriminatory access to OSS and provides competitors with a meaningful opportunity to compete.<sup>2</sup> Qwest's change management procedures will be incorporated into its SGAT (Section 12.2.6 and Exhibit G).

## **II. QWEST'S REDESIGNED CMP IS AS COMPREHENSIVE AS ANY OTHER ILEC'S PROCESS.**

Qwest and the CLEC community have spent more than 24 full days of face-to-face redesign meetings over the past eight months discussing every aspect of Qwest's CMP. The parties agreed to address systems issues first, and then address product/process issues. The

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<sup>2</sup> *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Arkansas and Missouri*, CC Docket No. 01-194, Memorandum Opinion and Order, FCC 01-338 (rel. Nov. 16, 2001) ("Arkansas/Missouri 271 Order"), Appendix D, at ¶ 40.

parties have now reached agreement on virtually all systems CMP issues except one issue relating to whether changes or enhancements required to meet performance measurements should be included in the Regulatory Change category.

The parties have agreed to the provisions that track their the agreed CMP in a document entitled "Interim Draft Master Redlined CLEC-Qwest CMP Re-design Framework" ("Redesign Framework"), which is posted on Qwest's CMP web site<sup>3</sup> and a copy of which is attached as Exhibit A. While the parties have reached agreement on the provisions of the Redesign Framework that govern the management of changes to Qwest's OSS, it also contains some provisions relating to other areas as to which the parties have not agreed. For ease of reference, the provisions that represent the parties' agreements regarding systems processes are highlighted in yellow. After the parties reach agreement on the product/process provisions, the highlighted provisions may require minor changes to ensure that the terminology used throughout the document is consistent and that agreements reached fit together into a cohesive and integrated whole. The parties understand that the CMP is a living process that will be subject to ongoing improvements.

The redesign participants agreed that Qwest would implement these agreements as soon as practicable. Qwest has implemented all of the systems processes, which are highlighted in the Redesign Framework and are currently in effect. These systems CMP provisions are discussed below.

#### **A. The Redesigned Systems CMP Process**

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<sup>3</sup> The Redesign Framework can be found on Qwest's CMP web site at the following URL: [www.qwest.com/wholesale/cmp/whatiscmp.html](http://www.qwest.com/wholesale/cmp/whatiscmp.html). In addition, a redlined version of this document that tracks all of the various changes made throughout the redesign process can be found on the CMP

Qwest's redesigned CMP provides CLECs as much opportunity for input, participation, and control as the change management processes implemented by Verizon, SBC, and BellSouth. Indeed, Qwest's CMP not only incorporates all of the main features offered by other ILECs, but it goes even further in some respects.

**Scope (Section 1).** The Introduction and Scope section of Qwest's CMP includes product and process issues in addition to OSS interfaces:

This document defines the processes for change management of OSS interfaces, products and processes (including manual) as described below. CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services provided by CLECs to their end users.<sup>4</sup>

In contrast, SBC's process only applies to changes to its interfaces. No other ILEC explicitly subjects product and process issues to its change management process.<sup>5</sup>

The FCC has not required any ILEC to have a change management process for product/process changes in order to receive Section 271 relief. The FCC has not discussed or even mentioned change management processes for product/process changes in any of its 271 orders.

Even though it is not required for Section 271, Qwest has implemented just such a process. Moreover, Qwest is using the same collaborative process it used to redesign the systems provisions to revise the product/process provisions of its CMP. Indeed, the parties

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Redesign web site under the heading "Redesign Documentation" at the following URL:  
[www.qwest.com/wholesale/cmp/redesign.html](http://www.qwest.com/wholesale/cmp/redesign.html).

<sup>4</sup> Redesign Framework, Section 1.0.

have agreed to the process by which CLECs submit change requests for product/process issues.<sup>6</sup>

In sum, Qwest's CMP is more comprehensive than any other ILEC's change management process.

**Types of Change (Section 2).** Qwest's CMP provides for four different types of changes: Regulatory Changes (Section 2.1), Industry Guideline Changes (Section 2.2), Qwest Originated Changes (Section 2.3), and CLEC Originated Changes (Section 2.4). These four categories provide for all of the same types of changes as the other ILECs. However, where other ILECs have created separate categories for certain subsets of changes (for example, Verizon has a separate category called Type 1 (Maintenance) Changes), Qwest's CMP simply allows any of these subsets of changes to be originated by a CLEC or Qwest.

Qwest has implemented the process for CLECs to prioritize Qwest-originated CRs, as well as CLEC-originated CRs. While the parties continue to work out issues related to regulatory CRs, the process Qwest has implemented treats regulatory CRs consistent with the way such CRs are treated by other BOCs. In fact, Qwest's CMP provides CLECs more input into treatment of regulatory CRs than the change management processes of other BOCs.

Qwest has agreed that CLECs may submit Regulatory and Industry Guideline change requests and that the same processes will apply regardless of the originator. The parties have also agreed that a change will only be treated as a Regulatory Change if the parties agree that a change is required to bring Qwest into compliance with a mandate. The parties are still

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<sup>5</sup> SBC has implemented a CLEC User Forum to address certain non-OSS issues. However, the CLEC User Forum is completely separate from SBC's change management process, which applies only to systems.

working through certain details relating to the Regulatory Changes category and expect to reach final agreement at the redesign session to be on February 19, 2002.

**Change Request Process (Section 3).** The OSS interface change request ("CR") initiation process provides that Qwest and CLECs both submit change requests to request changes to OSS interfaces. Both Qwest-initiated and CLEC-initiated OSS interface CRs follow the agreed process. The process provides that Qwest will hold a clarification meeting to ensure that the intent of the CR is clear. All OSS interface CRs will be discussed and modified, if necessary, at the monthly CMP meetings.

**Changes to Existing OSS Interfaces (Section 5).** The agreed implementation timeline for changes to an existing application-to-application OSS interface provides, among other things, for Qwest to provide to CLECs draft technical specifications containing the information CLECs need to code the interface at least 73 calendar days prior to implementing a release, and affords the CLECs an opportunity to provide written comments and/or questions relating to that documentation. Qwest will respond to the CLEC comments and/or questions and hold a meeting to allow CLECs' subject matter experts to ask questions of Qwest's technical team regarding specific requirements. Qwest will provide final release requirements at least forty-five (45) calendar days in advance of the implementation date. Qwest will also provide a thirty (30) day test window for any CLEC that desires to jointly test with Qwest prior to the implementation date. In addition, Qwest will provide a rolling twelve month summary of its OSS interface development schedule.

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<sup>6</sup> See Redesign Framework, Section 3.2.

Finally, Qwest employs versioning for its IMA interface, meaning that it maintains a prior version of a software release for some time after implementing a new version, so that CLECs need not switch to the newer version immediately.<sup>7</sup>

**Introduction and Retirement of OSS Interfaces (Sections 4 and 6).** These sections set forth processes for the introduction of a new OSS interface and retirement of an OSS interface. Each of these processes sets forth an agreed timeline for advance notification to CLECs and the opportunity for CLECs to provide input regarding new OSS interfaces and retirement of OSS interfaces.

**Administrative Matters, Meetings, Web Site (Sections 7 and 8).** Qwest holds monthly CMP meetings. In response to CLEC requests, these meetings consist of an entire day devoted to systems issues and an entire day devoted to product/process issues. The Redesign Framework reflects the agreements reached by Qwest and the CLECs regarding the content, format, and process for Qwest's distribution to CLECs of the materials to be reviewed at these meetings. Qwest maintains a web site containing all of the materials related to CMP, including the change management process itself. The web site also includes a wealth of other information about the change management process. For example, the web site (1) contains a listing of the change requests, their status, and a complete history of the action taken on each request, including minutes of meetings between the CLEC originator and Qwest; (2) sets forth the schedule for systems and product/process change management meetings; and (3) provides a link to OSS documentation and a list of releases notifications relating to that documentation.

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<sup>7</sup> See *Massachusetts 271 Order*, ¶ 107 (the FCC has "found versioning very useful to a BOC's demonstration that its change management process affords competing carriers a meaningful opportunity to compete because it ensures that system changes and enhancements do not adversely

The web site features enhanced search capabilities to assist CLECs in finding and using information on the site. Qwest and the CLECs collaboratively developed, and Qwest has implemented, a standard naming convention for the web site and formal notifications.

**Prioritization of Systems CRs.** Like other ILECs' change management processes, Qwest's CMP allows CLECs to prioritize both Qwest Originated and CLEC Originated change requests. This agreement has been implemented and CLECs have already prioritized Qwest Originated change requests along with CLEC Originated change requests for the upcoming 10.0 IMA-EDI release.

However, Qwest has gone even further by agreeing to allow CLECs to prioritize Regulatory Changes and Industry Guideline Changes to the extent possible. So long as Qwest is permitted to meet mandated implementation dates for Regulatory Changes and recommended implementation dates for Industry Guideline Changes, Qwest has agreed to allow CLECs to prioritize those changes as well. No other ILEC provides CLECs with this opportunity. Instead, other ILECs slot Regulatory and Industry Guideline Changes into a release ahead of other types of changes, leaving only the remainder of the release capacity to accommodate prioritized changes.

The parties have reached impasse regarding one issue relating to prioritization. That issue, more fully discussed in Section II.C. below, relates to whether changes required to meet performance measurements should be treated as Regulatory Changes.

**Application-to-Application Interface Testing (Section 10).** Qwest's CMP provides for interface testing for application-to-application interfaces. Qwest will provide a separate CLEC test environment for testing of transaction-based application-to-application interfaces

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affect a carrier's ability to access the BOC's OSS")(quoting *SWBT Texas Order*, 15 FCC Rcd at

and will provide test files for batch/file interfaces, such as billing interfaces. CLECs may perform initial implementation testing and migration testing. Initial implementation testing allows a CLEC to test new transactions for which it has not been through testing prior to production. Migration testing affords a CLEC the opportunity to test the technical specifications of the latest release from the previous version before moving from one version to the next version.

**Production Support (Section 11).** This section describes the procedures Qwest will use to maintain software after it is deployed into the production environment. If a CLEC experiences a software problem with Qwest's system, it can report the issue to Qwest's IT Wholesale Systems Help Desk, which serves as the CLECs' first point of contact for such issues. Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest. The process provides for reported troubles to be assigned a severity level and processed in accordance with the appropriate procedures based on that severity level. The procedures for the various severity levels include regular notifications to CLECs regarding the status of the issue.

**Escalation and Dispute Resolution (Sections 13 and 14).** In order to address CLEC concerns that multi-level escalations are too time-consuming, Qwest agreed to a single level escalation process where Qwest provides a single binding position on the issue. Qwest must respond to escalations within seven days if it relates to a change request; otherwise, Qwest must respond within 14 days. The dispute resolution process allows the parties to agree to resolve the dispute through alternative dispute resolution or to submit the issue to an appropriate regulatory agency.

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18408, ¶ 115).

**B. COIL Issues Resolved in CMP Redesign Meetings.**

The redesign team has addressed the following issues on the Colorado Issue Log for Workshop No. 6 (1<sup>st</sup> Session), Section 12, General Terms and Conditions, CICMP, BFR, June 19-22, 2001.

Clarity and accessibility of Qwest CICMP documents (Issue CM-1). Qwest has enhanced the design of the CMP web site to increase ease of navigation and locating specific documents.

Definition and adequacy of Qwest's escalation and dispute resolution process (Issue CM-2). The parties have discussed and agreed upon an escalation and dispute resolution process for the CMP. Those processes are set forth in Sections 13 and 14 of the Redesign Framework.

Five categories of changes in SBC documents (Issue CM-3). As discussed above, Qwest's CMP includes all of the categories of system changes included in SBC's documents. However, SBC includes additional subsets of categories as separate change types. All of these subsets of categories are encompassed in Qwest's CLEC Originated and Qwest Originated change types. Qwest has already implemented these four categories of changes.

Performance measurements for change management (Issue CM-4). To date, the parties to the Arizona TAG have agreed upon one new performance measurement, PO-16, which measures timeliness of release notifications.

Repair process subject to change management (Issue CM-5). The CMP scope specifically includes repair processes. *See* Redesign Framework, Section 1.

Frequency of scheduled CICMP meetings (Issue CM-6). The parties have agreed that CMP will be conducted on a regularly scheduled basis, at least on a monthly basis. At the CLECs' request based on the volume of issues to be addressed at these monthly forums, Qwest agreed to change the monthly forum format to include two separate full day meetings, with one full day dedicated to system CMP issues and one full day dedicated to product and process CMP issues, to allow for more substantive discussion.

Qwest-generated CRs (Issue CM-7). Qwest submits Qwest Originated CRs for changes to OSS interfaces.

Proprietary CR (Issue CM-8). This issue was raised because the prior process referred to proprietary CRs. It is no longer an issue because the redesigned CMP does not provide for proprietary CRs.

EDI draft worksheet availability (Issue CM-9). Qwest's CMP sets forth an implementation timeline for changes to an existing application-to-application OSS interface, which includes a requirement for Qwest to provide to CLECs draft technical specifications containing the information CLECs need to code the interface at least 73 calendar days prior to implementing a release, affords the CLECs an opportunity to provide written comments and/or questions relating to that documentation, and requires Qwest to provide final release requirements at least forty-five (45) calendar days prior to the implementation date. Qwest will also provide a thirty (30) day test window for any CLEC that desires to jointly test with Qwest prior to the implementation date.

Whether CLECs have had input into the development of the CMP (Issue CM-10). CLECs that are Core Team members are actively participating in the redesign meetings. Currently, the Core Team consists of Qwest and nine (9) CLEC entities that consistently and

actively negotiate changes to the CMP. The CLEC entities are: Allegiance Telecom, AT&T, Avista, Covad Communications, Eschelon Telecom, Integra, SBC Telecom, Sprint and WorldCom. Other CLEC participants occasionally join and participate in these meetings.

WCom not allowed to vote on EDI CRs (Issue CM-12). CLECs are not limited to prioritizing only CRs for the interfaces they use. If it chooses to, WorldCom or any other CLEC can prioritize EDI CRs and GUI CRs.

Scope of CMP (Issue CM-13 and 16). The parties agreed to the CMP scope, which is set forth Section 1 of the Redesign Framework.

Whether Contents of Exhibit G should be included in SGAT (Issue CM-14). Qwest has conceded this issue, and the governing document for CMP has been included as Exhibit G to the SGAT.

Whether Contents of Exhibit H should be included in SGAT (Issue CM-15). Qwest has conceded this issue, and the governing document for CMP has been included as Exhibit G to the SGAT. Section 12.2.6 of the SGAT refers to just Exhibit G, because Exhibit H (the escalation process) is now included within Exhibit G.

Processes for notification of CLECs and adequacy of process (Issue CM-17). This issue relates to product/process issues, rather than systems issues. The parties have reached preliminary agreement regarding various notification processes, but have not reached final agreement on all notification processes. The parties have also reached agreement on the basic categories of notifications and a naming convention for Qwest's CLEC notifications.

Documents described and as yet unidentified or unknown, which include the change request prioritization process and other links (Issue CM-18). The parties have reached

agreement on the prioritization process, with the exception of one impasse issue, which is described below.

**C. The Parties Reached Impasse regarding Changes Required to Meet Performance Measurements.**

The parties have reached impasse regarding a single issue: whether OBF language that treats changes to meet performance measurements as regulatory changes should be included in the Qwest CMP definition of Regulatory Changes.

The current OBF language defining Regulatory Changes includes the following:

These [changes] may include new functionality, enhancements to existing interface functionality, and/or enhancements required to meet performance measurements.

This provision is consistent with the current industry practice: all other ILECs treat changes required to meet performance measurements as Regulatory Changes in their change management processes.

Qwest believes this language should be added to its definition of Regulatory Changes. In addition to making Qwest's CMP consistent with industry practice, including the OBF language is consistent with the fact that Qwest's failure to meet its performance measurements can subject it to monetary penalties. It would be contradictory and unfair to deny Qwest the ability to treat performance measurement changes as Regulatory Changes on the one hand, yet require Qwest to pay penalties for failing to meet performance measurements on the other. Denying Qwest the ability to treat performance measurement changes as Regulatory Changes would result in subjecting any changes that Qwest needs to make to meet its performance measurements to the prioritization process. If CLECs do not prioritize such changes high enough to be implemented in a release, Qwest efforts to meet the measurements would be thwarted. This is not an unlikely scenario. During redesign meetings, some CLECs clearly

articulated their view that they are not necessarily interested in improvements in performance that is subject to performance penalties. If they have no need for improvement in a particular performance measurement that is tied to penalties, they will prioritize improvements to those measurements low so that any changes they have requested stand a better chance of being included in a release.

Qwest's definition of Regulatory Changes should include changes required to meet performance measurement because it is consistent with the OBF's recommendation and industry practice. Treating such changes any other way would be inequitable. It is important to note that the outcome of this issue does not alter the fact Qwest's CMP clearly meets the FCC's standards for change management -- either way, Qwest's CMP is sufficient for Section 271 purposes.

### **III. QWEST'S CMP SATISFIES THE CHECKLIST ITEM 2 REQUIREMENTS.**

In evaluating BOC change management plans under Checklist Item 2 of Section 271, the FCC has relied on the following factors: (1) that information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) that competing carriers had substantial input in the design and continued operation of the change management process; (3) that the change management plan defines a procedure for the timely resolution of change management disputes; (4) the availability of a stable testing environment that mirrors production; and (5) the efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway.<sup>8</sup>

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<sup>8</sup> *Arkansas/Missouri 271 Order*, Appendix D, at ¶ 42, citing *Bell Atlantic New York Order*, 15 FCC Rcd at 4002-004 (footnotes omitted).

The FCC has also examined whether a BOC has demonstrated a "pattern of compliance" with its own change management plan and whether it has provided adequate technical assistance to CLECs in using the BOC's OSS.<sup>9</sup> Qwest's stand-alone test environment and the documentation and technical assistance it provides to CLECs for the purpose of building electronic gateways are being evaluated as part of the OSS test and are not addressed here.

As demonstrated below, Qwest's current change management process satisfies each of these factors.

**A. Information relating to the Change Management Process is Clearly Organized and Readily Accessible to CLECs.**

The governing process for change management is contained in a single document that was the subject of extensive discussion, comment, and revision through collaboration between Qwest and the CLECs. The extensive CLEC participation in this process will resolve any and all issues regarding the clarity and accessibility of the change management materials.

Qwest maintains a web site that sets forth the current change management process, including the method for proposing and processing CLEC-originated and Qwest-originated

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<sup>9</sup> *Arkansas/Missouri 271 Order*, Appendix D, at 40; see also *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc., for Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket No. 01-9, Memorandum and Opinion Order, FCC 01-130 (rel. Apr. 16, 2001) ("*Massachusetts 271 Order*"), ¶ 103, citing *Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas*, CC Docket No. 00-65, Memorandum and Opinion Order, FCC 00-238 (rel. June 30, 2000) ("*SWBT Texas Order*"), 15 FCC Rcd at 18404, ¶ 108.

OSS interface change requests and CLEC-originated product and process change requests.<sup>10</sup>

The change request process provides that all change requests are presented to the CLEC community for discussion and modification at monthly meetings of CLEC and Qwest representatives.<sup>11</sup>

The website also includes a wealth of other information about the change management process, including change requests and their status, a history of the action taken on each request, the schedule for systems and product/process change management meetings; and links to OSS documentation and a list of releases notifications relating to that documentation.

**B. CLECs have Substantial Input in the Design and Continued Operation of the Change Management Process.**

CLECs currently have -- and have already had -- substantial opportunities for meaningful input into Qwest's change management process. Qwest and the CLECs jointly participate in Qwest's CMP for managing changes related to Qwest's products, processes, and systems that support the five categories of OSS functions (pre-ordering, ordering, provisioning, maintenance and repair, and billing). Since September 1999, CMP meetings have taken place at least once each month. Beginning in October 2001, in response to the CLECs' request, Qwest expanded the monthly CMP meeting to devote a full day to OSS interface issues and a full day to product and process issues. In addition, Qwest and the

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<sup>10</sup> The Qwest change management website can be found at the following URL: <http://www.qwest.com/wholesale/cmp/index.html>.

<sup>11</sup> CLEC Originated and Qwest Originated CRs are posted to the website. The change management website includes a link to a form that allows CLECs/Qwest to submit change requests to Qwest electronically. See Product/Process and Systems links listed under Change Requests at the following URL: <http://www.qwest.com/wholesale/cmp/index.html>. Qwest updates and maintains a database that tracks the progress of each specified change, reports changes systematically using change request numbers, and uses these same numbers in communications with CLECs to identify specific changes.

CLECs have met regularly to discuss CMP redesign. The schedules, agendas, and minutes of these meetings are posted on the Qwest CMP website.

Significantly, the parties to the redesign process have already agreed that even after negotiations are completed, there will be provisions under the CMP to manage changes to the CMP.

In sum, Qwest's current change management process provides for substantial CLEC input into design and operation of the process.

C. **The Change Management Process Defines a Procedure for the Timely Resolution of Change Management Disputes.**

Qwest's change management process contains escalation and dispute resolution procedures, which were developed collaboratively with and agreed upon by the CLECs.<sup>12</sup> At the CLECs' request, the escalation process has been streamlined, and now offers CLECs a single point of contact for a given issue. The Qwest single point of contact is responsible for providing a final binding position regarding the escalated issue.<sup>13</sup>

If an impasse develops, a CLEC or Qwest may bypass the escalation process and immediately invoke the dispute resolution process.<sup>14</sup> If the parties agree, the dispute can be resolved through an alternative dispute resolution process; alternatively, a CLEC or Qwest may submit the issue to an appropriate regulatory agency.

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<sup>12</sup> Redesign Framework, Sections 13 and 14.

<sup>13</sup> Redesign Framework, Section 13.

<sup>14</sup> Redesign Framework, Section 15.

**D. Qwest has Demonstrated a Pattern of Compliance with its Change Management Procedures.**

Qwest has demonstrated a pattern of compliance with its change management procedures. In processing change requests, Qwest has met its obligations with regard to the following: conducting meetings to clarify CLEC change requests; tracking and documenting the status of change requests; providing responses to CLEC change requests; discussing responses during the monthly CMP meetings; modifying responses based on CLEC input when appropriate; and providing CLECs with web-based access to change requests and related documentation. Qwest also has met its obligations to hold regular CMP meetings; to provide meeting materials in advance the meetings; and to record meeting discussion, action items, and issues. Further, Qwest has developed and maintains a CLEC and Qwest CMP Point of Contact list. In addition to demonstrating a pattern of compliance with its change management procedures, Qwest also established a pattern of quickly implementing the agreements reached in the redesign process. A table showing the various CMP redesign agreements and the date on which Qwest implemented them is attached as Exhibit B.

**IV. CONCLUSION**

In conclusion, Qwest's change management process fully satisfies the requirements of Section 271 because it provides nondiscriminatory access to OSS and provides competitors with a meaningful opportunity to compete. Qwest appreciates the time and effort the CLECs have devoted to participating in and providing substantial input to the redesign of Qwest's CMP.

Dated this 8th day of February, 2002.

Respectfully submitted,

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# EXHIBIT

A

**MASTER RED-LINED CLEC-QWEST CMP RE-DESIGN FRAMEWORK  
 INTERIM DRAFT - Revised 10-16-01, 10-3-01, 9-20-01, 11-1-01, 11-8-01, 11-16-01,  
 11-29-01, 12-10-01,12-19-01, 01-03-02, 02-07-02  
 CHANGE MANAGEMENT PROCESS (CMP)  
 FOR LOCAL SERVICES**

The highlighted portions of this document describe Qwest's current processes. These provisions may be modified through the redesign process.

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CHANGE MANAGEMENT PROCESS (CMP)**

The highlighted portions of this document describe Qwest's current processes. These provisions may be modified through the redesign process.

## **1.0 INTRODUCTION AND SCOPE**

This document defines the processes for change management of OSS interfaces, products and processes (including manual) as described below. CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services provided by CLECs to their end users.

The CMP is managed by CLEC and Qwest representatives each having distinct roles and responsibilities. The CLECs and Qwest will hold regular meetings to exchange information about the status of existing changes, the need for new changes, what changes Qwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.

Qwest will track changes to OSS interfaces, products and processes. The CMP includes the identification of changes and encompasses, as applicable. Qwest will process any such changes in accordance with the CMP described in this document.

The CMP is dynamic in nature and, as such, is managed through the regularly scheduled meetings. The parties agree to act in Good Faith in exercising their rights and performing their obligations pursuant to this CMP. This document may be revised, through the procedures described in Section (X).

<sup>1</sup> Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users

<sup>2</sup> Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

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## **2.0 TYPES OF CHANGE**

A Change Request should fall into one of the following classifications:

### **2.1 Regulatory Change**

A Regulatory Change is mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. Either the CLEC or Qwest may initiate the change request.

### **2.2 Industry Guideline Change**

An Industry Guideline Change implements Industry Guidelines using a national implementation timeline, if any. Either Qwest or the CLEC may initiate the change request. These guidelines are industry defined by:

- Alliance for Telecommunications Industry Solutions (ATIS) Sponsored
- Ordering and Billing Forum (OBF)
- Local Service Ordering and Provisioning Committee (LSOP)
- Telecommunications Industry Forum (TCIF)
- Electronic Commerce Inter-exchange Committee (ECIC)
- Electronic Data Interface Committee (EDI)
- American National Standards Institute (ANSI)

### **2.3 Qwest Originated Change**

A Qwest Originated change is originated by Qwest does not fall within the changes listed above and is within the scope of CMP.

### **2.4 CLEC Originated Change**

A CLEC Originated change is originated by the CLEC does not fall within the changes listed above and is within the scope of CMP.

<sup>1</sup> Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users

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### **3.0 CHANGE REQUEST INITIATION PROCESS**

#### **3.1 CLEC-Qwest OSS Interface Change Request Initiation Process**

The change request initiator will complete a Change Request Form as defined by the instructions on Qwest's CMP web site. The Change Request Form is also located on Qwest's CMP web site.

A CLEC or Qwest seeking to change an existing OSS interface, to establish a new OSS interface, or to retire an existing OSS interface must submit a change request (CR).

#### **Regulatory or Industry Guideline Change Request**

The party submitting a Regulatory or Industry Guideline CR must also include sufficient information to justify the CR being treated as a Regulatory or Industry Guideline CR in the CR description section of the CR form. Such information must include specific references to regulatory or court orders, legislation, or industry guidelines as well as dates, docket or case number, page numbers and the mandatory or recommended implementation date, if any.

Qwest or any CLEC may submit Regulatory and Industry Guideline CRs.

Not later than 8 business days prior to the Systems CMP Monthly meeting, any party objecting to the classification of such CR as Regulatory or Industry Guideline must submit a statement documenting reasons why the objecting party does not agree that the CR should be classified as Regulatory or Industry Guideline change. (Regulatory and Industry Guideline CR may not be Walk ons.)

If any party has objected to the classification of a CR as Regulatory or Industry Guideline, that CR will be discussed at the first monthly Change Management Meeting. At that meeting, the parties will attempt to reach agreement regarding the classification of the CR. If the parties at that meeting are unable to agree regarding the classification of the CR, the CR will be treated as a non-Regulatory, non-Industry Guideline CR and prioritized with the CLEC-initiated and Qwest-initiated CRs, unless and until the CR is declared to be Regulatory or Industry Guideline through dispute resolution.

The burden to initiate the escalation or dispute resolution processes lies with the party that believes the CR should be treated as a Regulatory or Industry Guideline CR. Qwest or any CLEC that believes its CR should be treated as a Regulatory or Industry Guideline CR despite objection to such categorization may invoke the escalation or dispute resolution process.

A CR originator e-mails a completed CR form to the Qwest Systems CMP Manager within two (2) business days after Qwest receives a complete CR:

- Qwest's CMP Manager assigns a CR number and logs the CR into the CMP database.
- The Qwest CMP Manager forwards the CR to the CMP Group Manager.
- The Qwest CMP Manager sends acknowledgement of receipt to the originator and updates the CR database.

<sup>1</sup> Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users

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Within two (2) business days after acknowledgement:

- The Qwest CMP Manager posts the complete CR to the CMP web site.
- The CMP Group Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate director responsible for the CR.
- The CRPM obtains from the director the names of the assigned subject matter expert(s) (SME).
- The CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
  - description of CR
  - originator
  - assigned CRPM
  - assigned CR number
  - designated Qwest SMEs and associated director(s)

Within eight (8) business days of receipt of a complete CR, the CRPM will coordinate and hold a clarification meeting with the originator and Qwest's SMEs. If the originator is not available within the above specified time frame, then the clarification meeting will be held at a mutually agreed upon time. Qwest may not provide a response to a CR until a clarification meeting has been held.

At the clarification meeting, Qwest and the originator will review the submitted CR, validate the intent of the originator's CR, clarify all aspects, identify all questions to be answered, and determine deliverables to be produced. After the clarification meeting has been held, the CRPM will document and issue meeting minutes within five (5) business days. Qwest's SME will internally identify options and potential solutions to the CR.

CRs received three (3) weeks prior to the next scheduled CMP meeting will be presented at that CMP meeting. At least one (1) week prior to that scheduled CMP meeting, the CRPM will have the response posted to the web, added to CMP database, and will notify all CLECs via email. CRs that are not submitted by the above specified cut-off date may be presented at that CMP meeting as a walk-on item with current status. Qwest may not provide responses to these walk-on requests until the next month's CMP meeting. The originator will present its CR and provide any business reasons for the CR. Items or issues identified during the previously held clarification meeting will be relayed. Participating CLECs will then be given the opportunity to comment on the CR and subsequent clarifications. Clarifications and/or modifications related to the CR will be incorporated. Qwest's SME will present options and potential solutions to the CR if applicable. Consensus will be obtained from the participating CLECs as to the appropriate direction/solution for Qwest's SME to take in responding to the CR if applicable.

Qwest will review the CRs received prior to the cut off date and evaluate whether Qwest can implement them. Qwest's responses will be one of the following:

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- "Accepted" (Qwest will implement the CLEC request) with position stated. If the CR is accepted, Qwest will provide the following in its response:
  - Determination and presentation of options of how the CR can be implemented
  - Identification of the preliminary level of effort (S, M, L, XL) required to implement the CR.
    - Small – requires changes to only one subsystem of a single system
    - Medium – requires changes to 2 or more subsystems of a single system
    - Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
    - Extra Large – requires extensive redesign of at least one system.
- "Denied" (Qwest will not implement the CLEC request) with basis for the denial, including reference to substantiating material.

If CLECs do not accept Qwest's response, they may elect to escalate or dispute the CR in accordance with the agreed upon CMP escalation or dispute resolution procedures. If the originating CLEC does not agree with the determination to escalate or pursue the dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR upon providing written notice to the Qwest CMP Manager. If the CLECs do not accept Qwest's response and do not intend to escalate or dispute at the present time, they may request Qwest to status the CR as deferred. The CR will be statused deferred and CLECs may activate or close the CR at a later date.

At the monthly CMP meeting, the CR originator will provide an overview of its respective CR(s) and Qwest will present either a status or its response.

Qwest or CLEC originated CRs for changes to an existing OSS interface will then be prioritized by the CLECs and Qwest resulting in the initial release candidate list. CLEC or Qwest originated CRs for introduction of a new interface or retirement of an existing interface are not subject to prioritization and will follow the introduction or retirement processes outlined in Sections 4.0 and 6.0, respectively.

Based on the initial release candidate list, Qwest will begin its development cycle which includes the following milestones:

- **Business and systems requirements:** Qwest engineers define the business and functional specifications during this phase. The specifications are completed on a per candidate basis in priority order.
- **Design:** Qwest engineers define the architectural and code changes required to complete the work associated with each candidate. The design work is completed on a per candidate basis in priority order.
- **Code & Test:** Qwest engineers will perform the coding and testing required to complete the work associated with each candidate. The code and test work is completed on a per candidate basis in priority order.

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Using the initial release candidate list, Qwest will begin business and system requirements. During the business and systems requirement efforts, CRs may be modified or new CRs may be generated (by CLECs or Qwest), with a request that the new or modified CRs be considered for addition to the release candidate list (late added CRs). If the CMP body grants the request to consider the late added CRs for addition to the release candidate list, Qwest will size the CR's requirements work effort. If the requirements work effort, for the late added CRs, can be completed by the end of system requirements, the initial release candidate list and the new CRs will be prioritized by CLECs in accordance with the agreed upon Prioritization Process (see Section 9.0). If the requirements work effort, for the late added CRs, cannot be completed by the end of system requirements, the CR will not be eligible for the release and will be returned to the pool of CRs that are available for prioritization in the next OSS interface release.

At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release.

If, in the course of the code and test effort, Qwest determines that it cannot complete the work required to include a candidate in the planned release, Qwest will discuss the CLECs, in the next CMP meeting, either the removal of that candidate from the list or a delay in the release date to incorporate that candidate. If the candidate is removed from the list, Qwest will also advise the CLECs as to whether or not the candidate could become a candidate for the next point release, with appropriate disclosure as part of the current major release of the OSS interface. Alternatively, the candidate will be returned to the pool of CRs that are available for prioritization in the next OSS interface release.

When Qwest has completed development of the OSS interface change, Qwest will release the OSS interface functionality into production for use by the CLECs.

Upon implementation of the OSS interface release, the CRs will be presented for closure at the next CMP monthly meeting.

### **3.2 CLEC PRODUCT/PROCESS CHANGE REQUEST INITIATION PROCESS**

If a CLEC wants Qwest to change a Product/Process the CLEC e-mails a completed Change Request (CR) Form to the Qwest Product/Process CMP Manager. Within 2 business days Qwest's Product/Process CMP Manager reviews CR for completeness, and requests additional information from the CR originator, if necessary, within two (2) business days after Qwest receives a complete CR:

- The Qwest CMP manager assigns a CR Number and logs the CR into the CMP Database.
- The Qwest CMP Manager forwards the CR to the CMP Group Manager,
- The Qwest CMP manager sends acknowledgment of receipt to the CR submitter and updates the CMP Database.

<sup>1</sup> Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users

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Within two (2) business days after acknowledgement,

- The Qwest CMP Manager posts the complete CR to the CMP Web site
- The CMP Group Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate Director responsible for the CR.
- The CRPM obtains from the Director the names of the assigned Subject Matter Expert(s) (SME).
- the CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
  - Description of CR
  - originating CLEC
  - assigned CRPM
  - assigned CR number
  - designated Qwest SMEs and associated director(s)

Within eight (8) business days after receipt of a complete CR, the CRPM Coordinates and holds a Clarification Meeting with the Originating CLEC and Qwest's SMEs. If the originating CLEC is not available within the above specified time frame, then the clarification meeting will be held at a mutually agreed upon time. Qwest will not provide a response to a CR until a clarification meeting has been held.

At the Clarification Meeting, Qwest and the Originating CLEC review the submitted CR, validate the intent of the Originating CLEC's CR, clarify all aspects, identify all questions to be answered, and determine deliverables to be produced. After the clarification meeting has been held, The CRPM will document and issue meeting minutes within five (5) business days. Qwest's SME will internally identify options and potential solutions to the CR

CRs received three (3) weeks prior to the next scheduled CMP meeting will be presented at that CMP Meeting. CRs that are not submitted by the above specified cut-off date may be presented at that CMP meeting as a walk-on item with current status. The Originating CLEC will present its CR and provide any business reasons for the CR. Items or issues identified during the previously held Clarification Meeting will be relayed. Then, participating CLECs will be given the opportunity to comment on the CR and subsequent clarifications. Clarifications and/or modifications related to the CR will be incorporated. Qwest's SME will present options and potential solutions to the CR. consensus will be obtained from the participating CLECs as to the appropriate direction/solution for Qwest's SME to take in responding to the CR.

Subsequently, Qwest will develop a draft response based on the discussion from the Monthly CMP Meeting. Qwest's Responses will be:

- "Accepted" (Qwest will implement the CLEC request) with position stated, or
- "Denied" (Qwest will not implement the CLEC request) with basis for the denial, including reference to substantiating material.

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11-29-01, 12-10-01,12-19-01, 01-03-02, 02-07-02**

At least one (1) week prior to the next scheduled CMP meeting, The CRPM will have the response posted to the Web, added to CMP Database, and will notify all CLECs via email

All Qwest Responses will be presented at the next scheduled CMP meeting by Qwest, who will conduct a walk through of the response. Participating CLECs will be provided the opportunity to discuss, clarify and comment on Qwest's Response

Based on the comments received from the Monthly Meeting, Qwest' may revise its response and issue a modified response at the next monthly CMP meeting. Within ten (10) business days after the CMP meeting, Qwest will notify the CLECs of Qwest's intent to modify its response.

If the CLECs do not accept Qwest's response, any CLEC can elect to escalate the CR in accordance with the agreed upon CMP Escalation or dispute resolution Procedures. If the originating CLEC does not agree with the determination to escalate or pursue the dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR upon providing written notice to the Qwest CMP manager.

If the CLECs do not accept Qwest's response and do not intend to escalate or dispute at the present time, they may request Qwest to status the CR as deferred. The CR will be stasured Deferred and CLECs may activate or close the CR at a later date.

The CLECs' acceptance of Qwest's response may result in:

- The response answered the CR and no further action is required;
- The response provided an implementation plan for a product or process to be developed;
- Qwest Denied the CLEC CR and no further action is required by CLEC.

If the CLECs have accepted Qwest's response, Qwest will provide notice of planned implementation in accordance with time frames defined in the CMP. If necessary, Qwest may request that CLECs provide input during the development stage. Qwest will then deploy the Qwest recommended implementation plan.

After Qwest's revised/new product or process is placed into production, CLECs will have no longer than 60 calendar days to evaluate the effectiveness of Qwest's revised/new product, or process, provide feedback, and indicate whether further action is required. Continual process improvement will be maintained.

Finally, the CR will be closed when CLECs determine that no further action is required for that CR.

#### **4.0 INTRODUCTION OF A NEW OSS INTERFACE**

The process for introducing a new interface will be part of the CMP. Introduction of a new OSS interface may include an application-to-application or a Graphical User Interface (GUI).

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It is recognized that the planning cycle for a new interface, of any type, may be greater than the time originally allotted and that discussions between CLECs and Qwest may be held prior to the announcement of the new interface.

With a new interface, CLECs and Qwest may define the scope of functionality introduced as part of the OSS Interface.

#### **4.1 Introduction of a New Application-to-Application Interface**

At least nine (9) months in advance of the target implementation date of a new application-to-application interface, Qwest will issue a Release Announcement, post the Preliminary Interface Implementation Plan on Qwest's web site, and may host a design and development meeting.

##### **4.1.1 Release Announcement**

Where practicable, the Release Announcement and Preliminary Interface Implementation Plan will include:

- Proposed functionality of the interface including whether the interface will replace an existing interface
- Proposed implementation time line (e.g., milestone dates, CLEC/Qwest comment cycle)
- Proposed meeting date to review the Preliminary Interface Implementation Plan
- Exceptions to industry guidelines/standards, if applicable
- Planned Implementation Date

##### **4.1.2 CLEC Comments/Qwest Response Cycle and Preliminary Implementation Plan Review Meeting**

CLECs have fourteen (14) calendar days from the initial release announcement to provide written comments/questions on the documentation. Qwest will respond with written answers to all CLEC issues within twenty-one (21) calendar days of the Initial Release Announcement. Qwest will review these issues and its implementation schedule at the Preliminary Implementation Plan Review Meeting approximately twenty-eight (28) calendar days after the Initial Release Announcement.

##### **4.1.3 Initial Interface Technical Specification**

Qwest will provide draft technical specifications at least one hundred twenty (120) calendar days prior to implementing the release. In addition, Qwest will confirm the schedule for the walk-through of technical specifications, CLEC comments, and Qwest response cycle.

##### **4.1.4 Initial Notification Content**

This notification will contain:

- Purpose
- Logistical information (including a conference line) for walk-through
- Reference to draft technical specifications, or web site
- Additional pertinent material
- CLEC Comment/Qwest Response cycle

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11-29-01, 12-10-01,12-19-01, 01-03-02, 02-07-02**

- Draft Connectivity and Firewall Rules
- Draft Test Plan

#### **4.1.5 Walk Through of Draft Interface Technical Specifications**

Qwest will sponsor a walk through, including the appropriate internal subject matter experts (SMEs), beginning one-hundred and ten (110) calendar days prior to implementation. A walk through will afford CLEC SMEs the opportunity to ask questions and discuss specific requirements with Qwest's technical team. CLECs are encouraged to invite their technical experts, systems architects, and designers, to attend the walk through.

#### **4.1.6 Conduct Walk-through**

Qwest will lead the review of technical specifications. Qwest technical experts will answer the CLEC SMEs' questions. Qwest will capture action items such as requests for further clarification. Qwest will follow-up on all action items.

#### **4.1.7 CLEC Comments on Draft Interface Technical Specifications**

If the CLEC identifies issues or requires clarification, the CLEC must send written comments/concerns to the Systems CMP Manager no later than one-hundred and four (104) calendar days prior to implementation.

#### **4.1.8 Qwest Response to Comments**

Qwest will review and respond with written answers to all CLEC issues, comments/concerns and action items captured at the walk through, no later than one hundred (100) calendar days prior to implementation. The answers will be shared with all CLECs, unless the CLECs question(s) are marked proprietary. Any changes that may occur as a result of the responses will be distributed to all CLECs in the final notification letter. The notification will include the description of any change(s) made as a result of CLEC comments. The change(s) will be reflected in the final technical specifications.

#### **4.1.9 Final Interface Technical Specifications**

Generally, no less than one hundred (100) calendar days prior to the implementation of the new interface, Qwest will issue the Final Release Requirements to CLECs via web site posting and a CLEC notification.

Final Release Requirements will include:

- Final Notification Letter, including:
- Summary of changes from Qwest response to CLEC comments on Draft Technical Specifications
- If applicable, Indication of type of change (e.g., documentation change, business rule change, clarification change)
- Purpose
- Reference to final technical specifications, or web site
- Additional pertinent material

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- Final Connectivity and Firewall Rules
- Final Test Plan (including Joint Testing Period)
- Release date

Qwest's planned implementation date will not be sooner than one hundred (100) calendar days from the date of the final release requirements. The implementation time line for the release will not begin until final specifications are provided. Production Support type changes within the thirty (30) calendar day test window can occur without advance notification but will be posted within 24 hours of the change.

#### **4.2 Introduction of a New GUI**

Qwest will issue a Release Notification forty-five (45) calendar days in advance of the Release Production Date. This will include:

- Proposed functionality of the interface including whether the new interface will replace an existing interface.
- Implementation time line (e.g., milestone dates, CLEC/Qwest comment cycle, Interface overview date)
- Implementation date
- Logistics for GUI Interface Overview

At least twenty-eight (28) calendar days in advance of the target implementation date of a new GUI interface, Qwest will issue a Release Announcement. At a minimum, the Release Announcement will include:

- Draft User Guide
- How and When Training will be administered

##### **4.2.1 Interface Overview**

The Interface Overview meeting should be held no later than twenty-seven (27) calendar days prior to the Release Production Date. At the meeting, Qwest will present an overview of the new interface.

##### **4.2.2 CLEC Comments and Qwest Response**

At least twenty-five (25) calendar days prior to the Release Production Date CLECs must forward their written comments and concerns to Qwest. Qwest will consider CLEC comments and may address them with the release of the Final Notification.

##### **4.2.3 Final Notification**

Qwest will issue a final notice no less than twenty-one (21) calendar days prior to the Release Production date. The final notice will include:

- A summary of changes from the initial notice, including type of changes (e.g., documentation change, clarification, business rule change).
- Final User Guide
- Final Training information

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- Final Implementation date

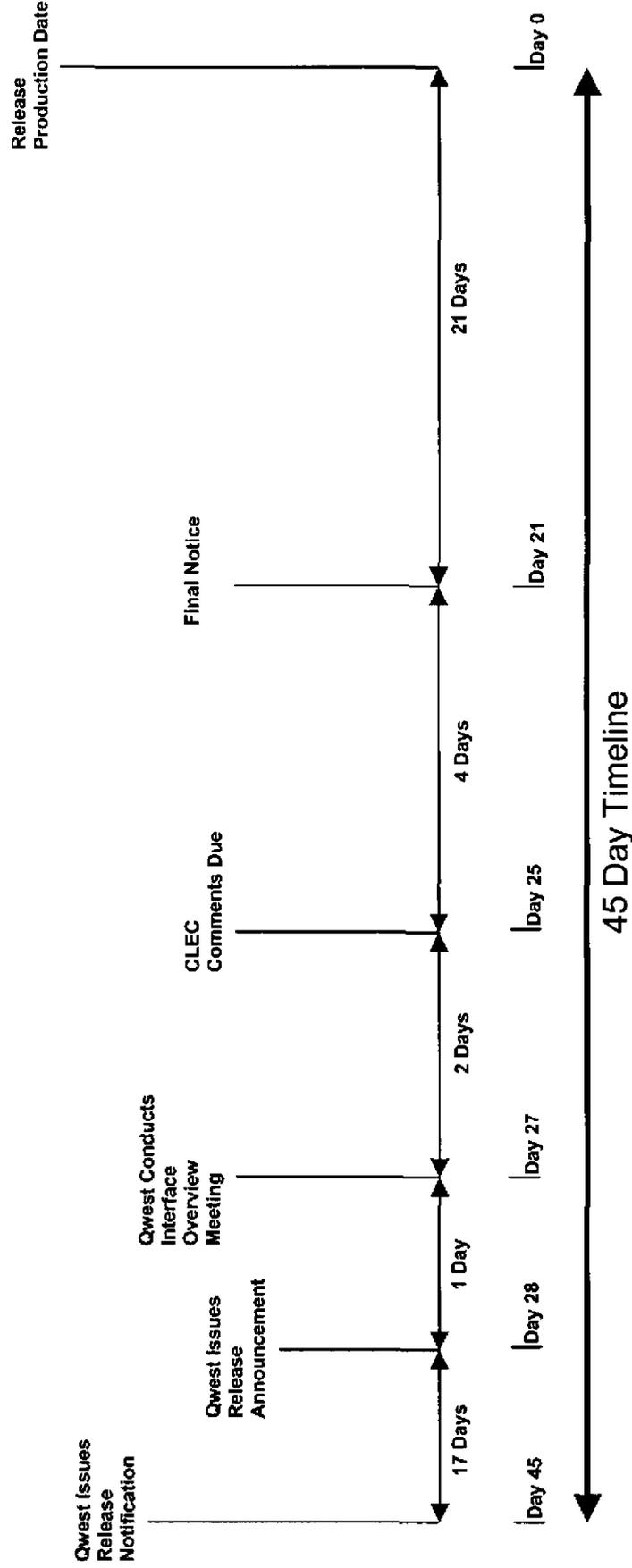
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## Qwest-CLEC Change Management Process Introduction of A New Graphical User Interface (GUI) Timeline



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## **5.0 CHANGE TO EXISTING OSS INTERFACES**

At the first CMP systems monthly meeting of each quarter, Qwest will also provide a rolling twelve (12) month view of its OSS interface development schedule.

Qwest standard operating practice is to implement 3 major releases and 3 point releases (for IMA only) within a calendar year. Unless mandated as a Regulatory Change, Qwest will implement no more than four (4) releases per IMA OSS Interface requiring coding changes to the CLEC interfaces within a calendar year. The Major release changes should occur no less than three (3) months apart.

### **Application-to-Application OSS Interface**

Qwest will support the previous major Interconnect Mediated Access (IMA) EDI release for six (6) months after the subsequent major IMA EDI release has been implemented.

Past versions of IMA EDI will only be modified as a result of production support changes. All other changes become candidates for future IMA EDI releases.

Qwest makes one version of the Electronic Bonding-Trouble Administration (EBTA) and billing interfaces available at any given time, and will not support any previous versions.

### **Graphical User Interface (GUI)**

Qwest makes one version of a GUI available at any given time and will not support any previous versions.

IMA GUI changes for a pre-order or ordering will be implemented at the same time as an IMA EDI release.

## **5.1 Application-to-Application**

This section describes the timelines that Qwest, and any CLEC choosing to implement on the Qwest Release Production Date (date the Qwest release is available for use, will adhere to in changing existing interfaces. <sup>1</sup>For any CLEC not choosing to implement on the Qwest Release Production Date, Qwest and the CLEC will negotiate a mutually agreed to CLEC implementation time line, including testing.

### **5.1.1 Draft Interface Technical Specifications**

Prior to Qwest implementing a change to an existing interface, Qwest will notify CLECs of the draft Technical Specifications.

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<sup>1</sup> For a CLEC converting from a prior release, the CLEC implementation date can be no earlier than the weekend after the Qwest Release Production Date, if production LSR conversion is required.

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Qwest will provide draft technical specifications at least seventy-three (73) calendar days prior to implementing the release unless the exception process (see Section xx) has been invoked. Technical specifications are documents that provide information the CLECs need to code the interface. CLECs have eighteen (18) calendar days from the initial publication of draft technical specifications to provide written comments/questions on the documentation.

### **5.1.2 Content of Draft Interface Technical Specifications**

The Notification letter will contain:

- Written summary of change(s)
- Target time frame for implementation
- Draft documentation, or instructions on how to access documentation on the Web site.

### **5.1.3 Walk Through of Draft Interface Technical Specifications**

Qwest will sponsor a walk through, including the appropriate internal subject matter experts (SMEs), beginning sixty-eight (68) calendar days prior to implementation and ending no less than fifty-eight (58) calendar days prior to implementation. A walk through will afford CLEC SMEs the opportunity to ask questions and discuss specific requirements with Qwest's technical team. CLECs are encouraged to invite their technical experts, systems architects, and designers, to attend the walk through.

#### **5.1.3.1 Walk through Notification Content**

This notification will contain:

- Purpose
- Logistical information (including a conference line)
- Reference to draft technical specifications, or web site
- Additional pertinent material

#### **5.1.3.2 Conduct the Walk-through**

Qwest will lead the review of technical specifications. Qwest technical experts will answer the CLEC SMEs' questions. Qwest will capture action items such as requests for further clarification. Qwest will follow-up on all action items and notify CLECs of responses 45 calendar days prior to implementation.

#### **5.1.4 CLEC's Comments on Draft Interface Technical Specifications**

If the CLEC identifies issues or requires clarification, the CLEC must send written comments to the Systems CMP Manager no less than fifty-five (55) calendar days prior to implementation.

#### **5.1.5 Qwest Response to Comments**

Qwest will review and respond with written answers to all CLEC issues, comments/concerns no less than forty-five (45) calendar days prior to implementation. The answers will be shared with all CLECs, unless the CLECs question(s) are marked proprietary. Any changes that may occur as a result of the responses will be distributed to all CLECs in the same notification letter. The notification will include the description of any change(s) made as a result of CLEC comments. The change(s) will be reflected in the final technical specifications.

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### **5.1.6 Final Interface Technical Specifications**

The notification letter resulting from the CLEC's comments from the Initial Release Notification will constitute the Final Technical Specifications.

### **5.1.7 Content of Final Notification Letter**

The Final Release will include the following:

- Reference to Final Technical Specifications, or web site
- Qwest response to CLEC comments
- Summary of changes from the prior release, including any changes made as a result of CLEC comments on Draft Technical Specifications
- Indication of type of change (e.g., documentation change, business rule change, clarification change)
- Final Joint Test Plan including transactions which have changed
- Joint Testing Period
- Release date

Qwest's planned implementation date will be at least forty-five (45) calendar days from the date of the final release requirements, unless the exception process has been invoked. The implementation time line for the release will not begin until final specifications are provided. Production Support type of changes that occur within the thirty (30) calendar day test window can occur without advance notification but will be posted within 24 hours of the change.

### **5.1.8 Joint Testing Period**

Qwest will provide a thirty (30) day test window for any CLEC who desires to jointly test with Qwest prior to the Release Production Date.

## **5.2 Graphical User Interface (GUI)**

### **5.2.1 Draft GUI Release Notice**

Prior to implementation of a change to an existing interface, Qwest will notify CLECs of the draft release notes and the planned implementation date.

Notification will occur at least twenty-eight (28) calendar days prior to implementing the release unless an exception process has been invoked. This notification will include draft user guide information if necessary.

CLECs must provide comments/questions on the documentation no less than twenty-five (25) calendar days prior to implementation.

Final notice for the release will be published at least twenty-one (21) calendar days prior to production release date.

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### **5.2.2 Content of Draft Interface Release Notice**

The notification will contain:

- Written summary of change(s)
- Target time frame for implementation
- Any cross-reference to draft documentation such as the user guide or revised user guide pages.

### **5.2.3 CLEC Comments on Draft Interface Release Notice**

Any CLEC comments must be submitted in writing to the Systems CMP Manager.

### **5.2.4 Qwest Response to Comments**

Qwest will consider CLEC comments and may address them in the final GUI release notice within four (4) calendar days.

### **5.2.5 Content of Final Interface release Notice**

CLEC comments to the draft notice may be incorporated into the final notice, which shall include:

- Final notification letter
- Summary of changes from draft interface release notice
- Final user guide (or revised pages)
- Release date

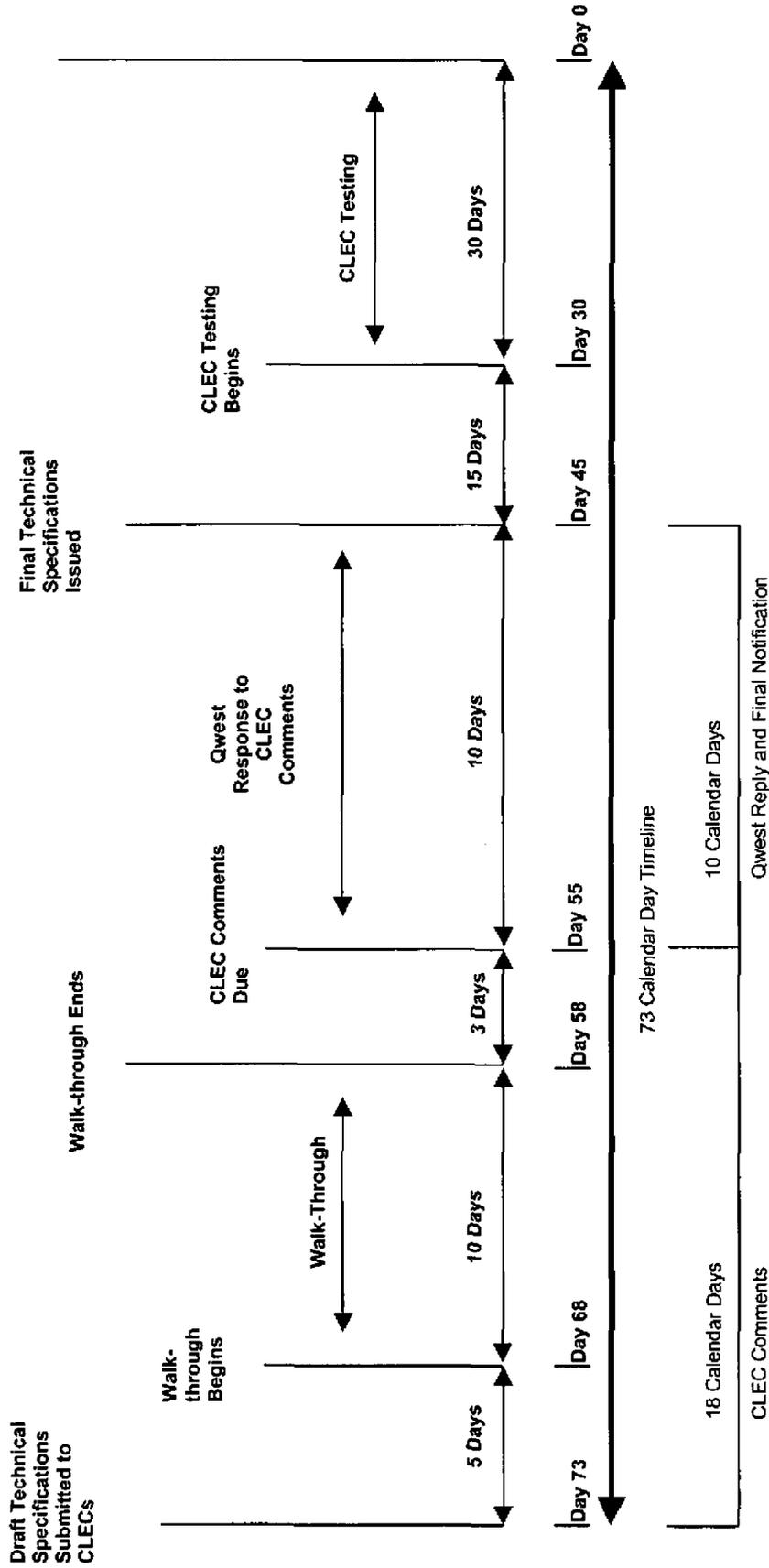
Qwest's planned implementation date will be no later than twenty-one (21) calendar days from the date of the final release notice. Qwest will post this information on the CMP web site. Production support type changes that occur without advance notification will be posted within 24 hours of the change. The implementation time line for the release will not begin until all related documentation is provided.

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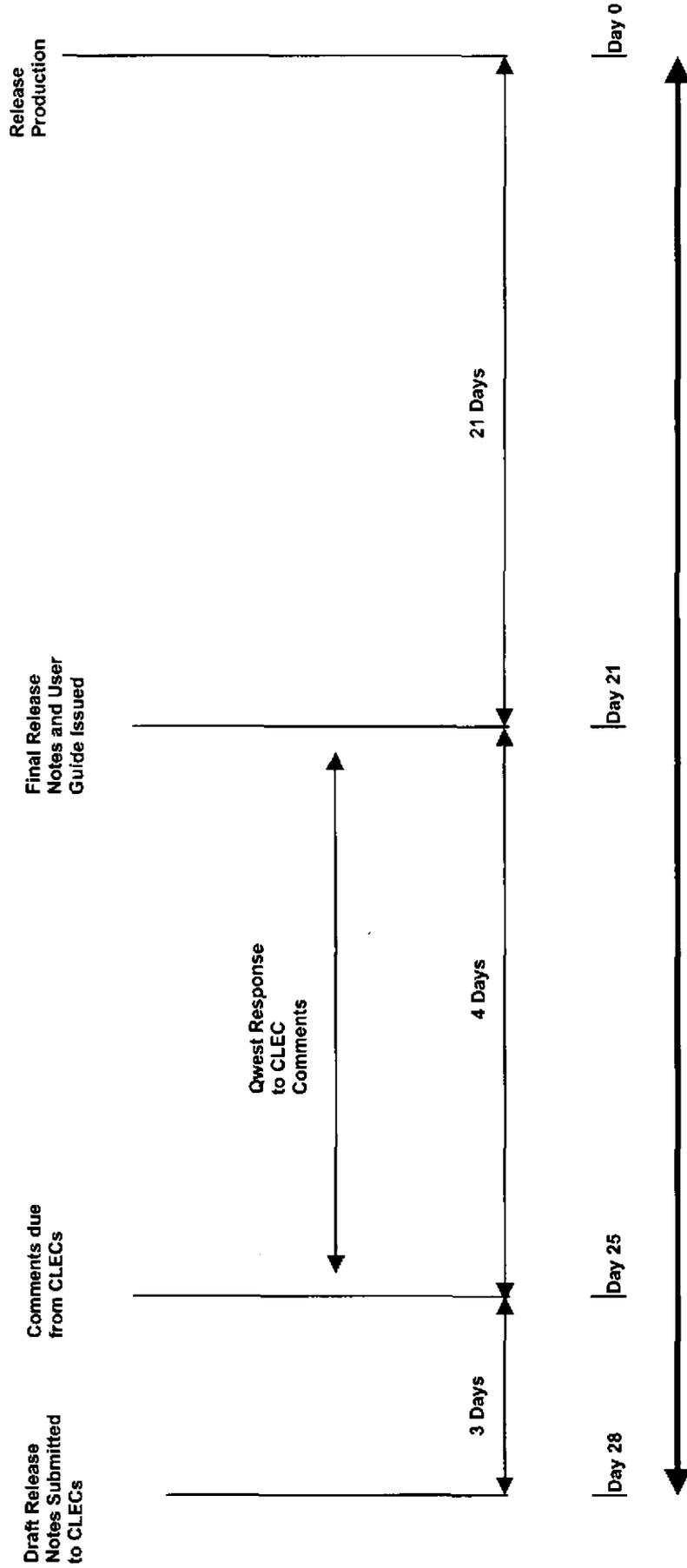
# Qwest-CLEC Change Management Process Changes to An Existing Application-to-Application OSS Interface



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## Qwest-CLEC Change Management Process Changes to An Existing Graphic User Interface (GUI)



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## **6.0 RETIREMENT OF EXISTING OSS INTERFACES**

The retirement of an existing OSS Interface occurs when Qwest ceases to accept transactions using a specific OSS Interface. This may include the removal of a Graphical User Interface (GUI) or a protocol transmission of information (Application-to-Application) interface.

### **6.1 Application-to-Application OSS Interface**

#### **6.1.1 Initial Retirement Plans**

At least nine (9) months before the retirement date of Application-to-Application interfaces, Qwest will share the retirement plans via web site posting and CLEC notification. The scheduled new interface is to be in a CLEC certified production release prior to the retirement of the older interface.

Alternatively, Qwest may choose to retire an interface if there is no CLEC usage of that interface for the most recent three (3) consecutive months. Qwest will provide thirty (30) calendar day notification of the retirement via web posting and CLEC notification.

#### **6.1.2 Initial Retirement Notice to CLECs:**

Initial Retirement Notices will include:

- The rationale for retiring the OSS Interface
- Available alternative interface options for existing functionality
- The proposed detailed retirement time line (e.g., milestone dates, CLEC-Qwest comment and response cycle)
- Targeted retirement date

#### **6.1.3 CLEC Comments to Initial Retirement Notice**

CLEC comments to the Initial Retirement Notice are due to Qwest no later than fifteen (15) calendar days following the Initial Retirement Notice.

#### **6.1.3 Comparable Functionality**

Unless otherwise agreed to by Qwest and a CLEC user, when Qwest announces the retirement of an interface for which a comparable interface does or will exist, a CLEC user will not be permitted to commence building to the retiring interface. CLEC users of the retiring interface will be grandfathered until the retirement of the interface. Qwest will ensure comparable functionality no less than six months prior to retirement of an Application-to-Application interface.

#### **6.1.4 Final Retirement Notice**

The Final Retirement Notice will be provided to CLECs no later than two-hundred and twenty-eight (228) calendar days prior to the retirement of the application-to-application interface. The Final Retirement Notice will contain:

- The rationale for retiring the OSS Interface (e.g., no usage or replacement)
- If applicable, where the replacement functionality will reside in a new interface and when the new interface has been certified by a CLEC

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- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

## **6.2 Graphical User Interface (GUI)**

### **6.2.1 Initial Retirement Plans**

At least two (2) months in advance of the target retirement date of a GUI, Qwest will share the retirement plans via web site posting and CLEC notification. The scheduled new interface is to be in a CLEC certified production release prior to the retirement of the older interface.

Alternatively, Qwest may choose to retire an interface if there is no CLEC usage of that interface for the most recent three (3) consecutive months. Qwest will provide thirty (30) calendar day notification of the retirement via web posting and CLEC notification.

### **6.2.2 Initial Retirement Notice to CLECs:**

Initial Retirement Notices will include:

- The rationale for retiring the OSS Interface
- Available alternative interface options for existing functionality
- The proposed detailed retirement time line (e.g., milestone dates, CLEC-Qwest comment and response cycle)
- Targeted retirement date

### **6.2.3 CLEC Comments to Initial Retirement Notice**

CLEC comments to the Initial Retirement Notice are due to Qwest no later than fifteen (15) calendar days following the Initial Retirement Notice.

### **6.2.4 Comparable Functionality**

Qwest will ensure comparable functionality no less than thirty-one (31) days before retirement of a GUI.

### **6.2.5 Final Retirement Notice**

The Final Retirement Notice will be provided to CLECs no later than twenty-one (21) calendar days following the initial retirement notice for GUI retirements. The Final Retirement Notice will contain:

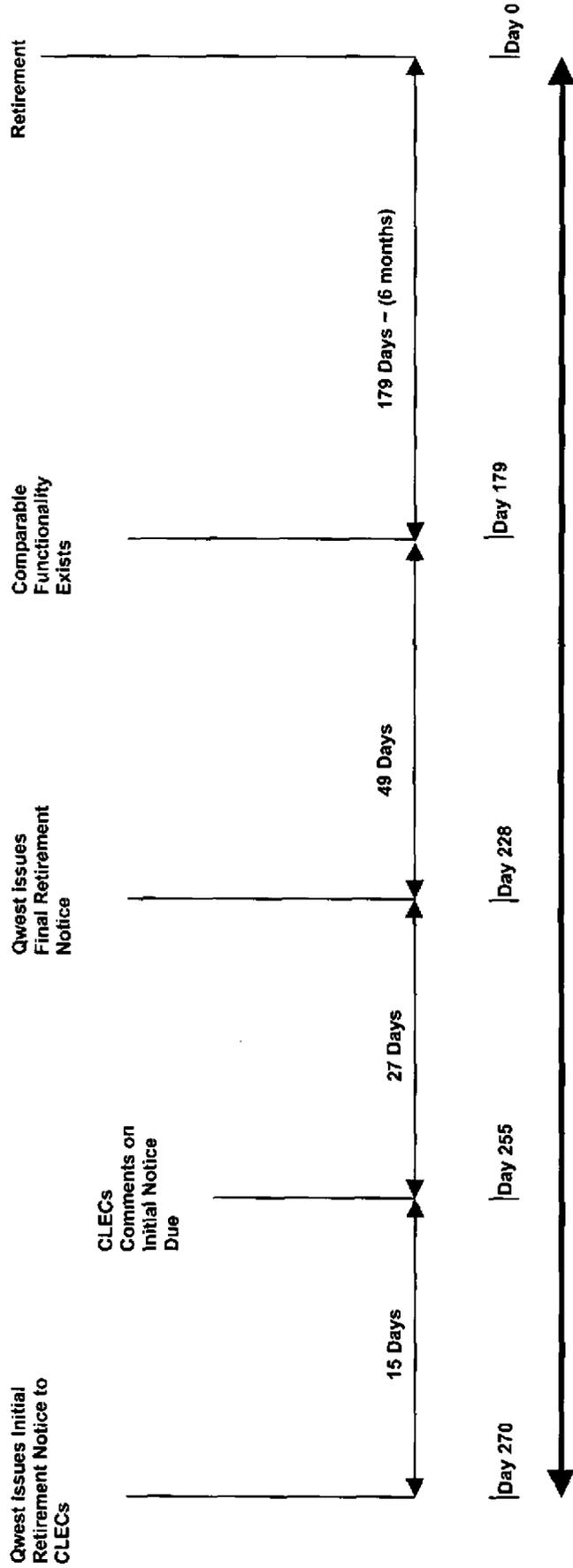
- The rationale for retiring the OSS Interface (e.g., no usage or replacement)
- If applicable, where the replacement functionality will reside in a new interface and when the new interface has been certified by a CLEC
- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

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## Qwest-CLEC Change Management Process Retirement of An Existing Application-to-Application OSS Interface



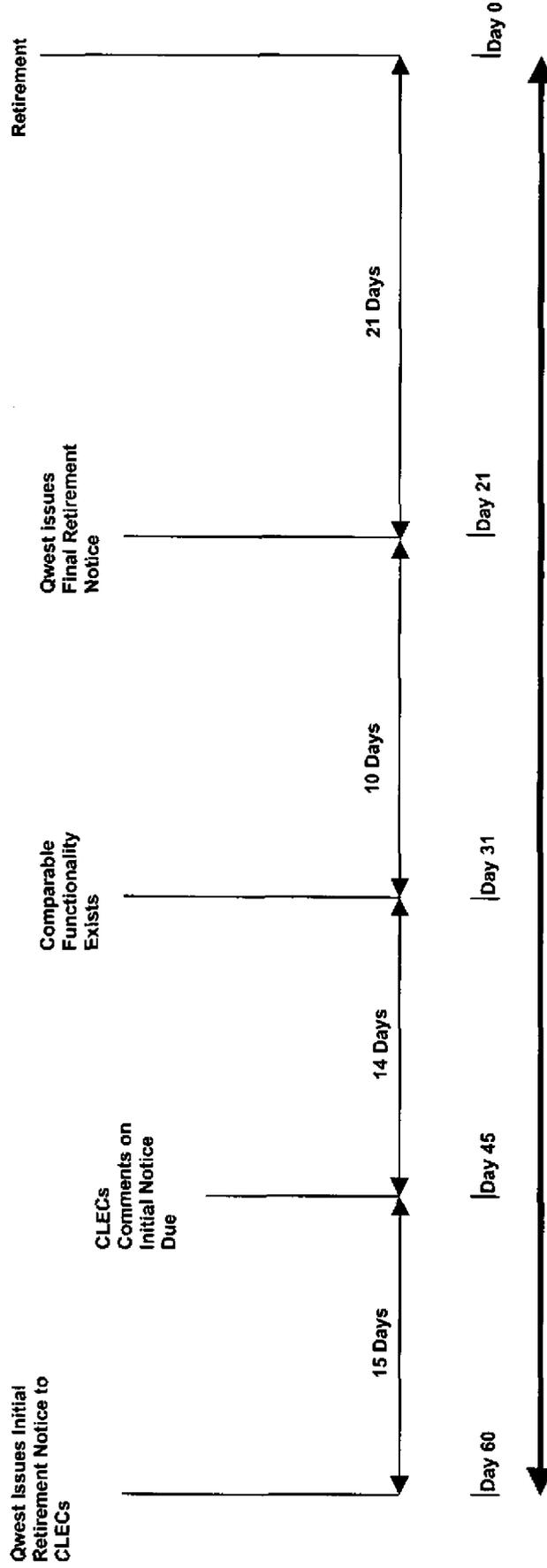
**9 Months (Approximately)**

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## Qwest-CLEC Change Management Process Retirement of An Existing Graphic User Interface Timeline



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## **7.0 MANAGING THE CHANGE MANAGEMENT PROCESS**

### **7.1 Change Management POC**

Qwest and each CLEC will designate primary and secondary change management POC(s) who will serve as the official designees for matters regarding this CMP. The primary POC is the official voting member, and a secondary (alternate) POC can vote in the absence of the primary POC for each CLEC.

CLECs and Qwest will exchange POC information including items such as:

- Name
- Title
- Company
- Telephone number
- E-mail address
- Fax number
- Cell phone/Pager number

### **7.2 Change Management POC List**

Primary and secondary CLEC POCs should be included in the Qwest maintained distribution list. It is the CLECs responsibility to notify Qwest of any POC changes. The list will be made available to all participating CLECs with the permission of the POCs.

### **7.3 Preferred Method of Communication**

The preferred method of communication is e-mail with supporting information posted to the web site.

### **7.4 Governing Body**

*The change management organizational structure must support the CMP. Each position within the organization has defined roles and responsibilities as outlined below.*

*CMP Team: Representatives are from the CLECs (or their authorized agents) and Qwest. This team meets monthly to review, prioritize, and make recommendations for change management requests. The change management requests are used as input to internal change management processes.*

*CMP Steering Committee: The CMP Steering Committee consists of representatives from the CLECs and Qwest who will be responsible for managing compliance to the CMP document. The responsibilities of the CMP Steering Committee are:*

- *On-going commitment*
- *Participation in change management meetings/conference calls*
- *Reviewing changes/suggestions to the CMP document for submittal to OBF*
- *Process improvements*
- *Managing meeting schedule/logistics*

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*A standing agenda item at the regular change management meetings will provide an opportunity for Qwest and CLECs to assess the effectiveness of the CMP. Both the CLECs and Qwest will use this opportunity to provide feedback of instances of non-compliance and commit to taking appropriate action(s).*

*Provider POC: Qwest POC is responsible for managing the CMP. Qwest POC will be responsible for maintaining the integrity of the change requests, preparing for and facilitating review meetings, presenting change requests to Qwest's internal CMP, and ensuring that all notifications are communicated to the appropriate parties.*

*CLEC POC: The CLEC POC will serve as the official designee for all matters regarding CMP, including:*

- Submission of CLEC change request forms*
- Notification of critical matters, such as Type 1 errors*

*Release Management Team: A team of CLEC and provider representatives who manage the implementation of scheduled releases.*

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## **8.0 MEETINGS**

Change Management meetings will be conducted on a regularly scheduled basis, at least on a monthly basis. Meeting participants can choose to attend meetings in person or participate by conference call.

Meetings are held to review, prioritize, manage the implementation of process and system changes and address change management requests. Qwest will review the status of all applicable change requests. The meeting may also include discussions of Qwest's development view.

CLEC's request for additional agenda items and associated materials should be submitted to Qwest at least five (5) business days by noon (MST) in advance of the meeting. Qwest is responsible for distributing the agenda and associated meeting materials at least three (3) business days by noon (MST) in advance of the meeting. Qwest will be responsible for preparing, maintaining, and distributing meeting minutes. Attendees with any walk-on items should bring materials of the walk-on items to the meeting.

All attendees, whether in person or by phone, must identify themselves and the company they represent.

Additional meetings may be held at the request of Qwest or any qualified CLEC (as defined in this document). Meeting notification must contain an agenda plus any supporting meeting materials. These meetings should be announced at least five (5) business days prior to their occurrence. Exceptions may be made for emergency situations.

### **8.1 Meeting Materials [Distribution Package] for Change Management Meeting**

Meeting materials should include the following information:

- Meeting Logistics
- Minutes from previous meeting
- Agenda
- Change Requests and responses
  - New/Active
  - Updated
  - Log
- Issues, Action Items Log and associated statuses
- Release Summary<sup>1</sup> 12 Month Development View
- Monthly System Outage Report
- Any other material to be discussed

Qwest will provide Meeting Materials (Distribution Package) electronically by noon 3 business days prior to the Monthly CMP Meeting. In addition, Qwest will provide hard copies of the Distribution Package at the Monthly CMP Meeting.

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## **8.2 Meeting Minutes for Change Management Meeting**

Qwest will take minutes. Qwest will summarize discussions in meeting minutes and include any revised documents such as Issues, Action items and statuses.

Minutes should be distributed to meeting participants for comments or revisions no later than five (5) business days by noon (MST) after the meeting. CLEC comments should be provided within two (2) business days by noon (MST). Revised minutes, if CLEC comments are received, should be distributed within nine (9) business days by noon (MST) after the meeting.

## **8.3 Qwest Wholesale CMP Web Site**

To facilitate access to CMP documentation, Qwest will maintain CMP information on its web site. The web site should be easy to use and updated in a timely manner. The Web site should be a well organized central repository for CLEC notifications and CMP documentation. Active documentation including meeting materials (Distribution Package), should be maintained on the website. Change Requests and release notifications should be identified in accordance with the agreed upon naming convention, to facilitate ease of identification. Qwest will maintain closed and old versions of documents on the web site's Archive page for 18 months before storing off line. Information that has been removed from the web site can be obtained by contacting the appropriate Qwest CMP Manager. At a minimum, the CMP web site will include:

- Current version of Qwest CMP document describing CMP's purpose and scope of setting forth the CMP objectives, procedures, and timelines, including release life cycles.
- Calendar of release dates
- OSS hours of availability
- Links to related web sites, such as IMA EDI, IMA GUI, CEMR, and Notices
- Current CMP escalation process
- CMP prioritization process description and guidelines
- Change Request form and instructions to complete form
- Submitted and open Change Requests and the status of each
- Responses to Change Requests and written responses to CLEC inquiries
- Meeting (formal and informal) information for CMP monthly meetings and interim meetings or conference calls, including descriptions of meetings and participants, agendas, sign-up forms, and schedules
- A log of CLEC and Qwest change requests and associated statuses
- Meeting materials (distribution package)
- Meeting minutes
- Release announcements and other CLEC notifications and associated requirements
- Directory to CLEC notifications for the month
- Business rules, SATE test case scenarios technical specifications, and user guides will be provided via links on the CMP web site.
- Contact information for the CMP POC list, including CLEC, Qwest and other participants (with participant consent to publish contact information on web page).

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## **9.0 PRIORITIZATION**

### **9.1 Prioritization Review**

The prioritization review provides the forum for reviewing and prioritizing Type 4 and Type 5 change requests. Qwest will facilitate the meeting. Both CLECs and Qwest should have appropriate subject matter experts in attendance. Meetings will be held monthly, or more frequently if needed, and are open to all CLECs. The prioritization review objectives are to:

- Introduce newly initiated CLEC and provider change requests.
- Allow CLECs to prioritize new change requests and re-rate existing change requests by providing specific input as to the relative importance that CLECs, as a group, assign to each such change request.
- Provide status on outstanding CLEC and provider change requests.
- Qwest will distribute all materials fourteen (14) calendar days prior to the prioritization review. The materials will include:
  - Agenda
  - Prioritized spreadsheet of Type 4 and Type 5 change requests
  - Spreadsheet of change requests pending initial rating and re-rating (see Appendix B)
  - New change requests as submitted by initiating CLEC or provider

### **9.2 Prioritization Process**

During the review, the initiators will present their new change requests and any requests for re-rate. This will be followed by a question and answer session. After all presentations are complete, the voting of change requests will begin.

Re-rate requests will only be accepted from CLECs who participated in the initial voting. Once a re-rate is requested, all CLECs participating at the subsequent meeting can submit a rating.

CLECs may request and rate a modification to a new change request at the prioritization review, if agreed to by the originating CLEC(s). The originating CLEC must update the change request with the agreed upon modification.

### **9.3 Voting**

Voting should be conducted according to the following guidelines:

- A CLEC must either be using the interface impacted by the change request or have a Letter of Intent to use the interface on file with Qwest to participate in the vote.
- Each CLEC is allowed one vote per change request and should have one representative responsible to provide a rating. Each CLEC can only assign a rating to a change request at the prioritization review. A rating will not be accepted outside of the prioritization review.
- CLECs may only provide a rating at the meeting where the new change request is introduced. CLECs that were not present at that meeting may not submit ratings at subsequent meetings, unless there is a request to re-rate.

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- *A CLEC may delegate its vote to an authorized agent acting on its behalf by providing a Letter of Authority.*
- *Each participating CLEC ranks each change request by providing a rank from 1 (low) to 5 (high). Votes will be averaged to determine order of ranking and results (see Appendix C) will be provided prior to the close of the prioritization review.*
- *CLECs can defer/pass on voting. A rating of defer or pass will not be averaged in the overall rating.*

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## **10.0 APPLICATION-TO-APPLICATION INTERFACE TESTING**

If CLEC is using an application-to-application interface, CLEC must work with Qwest to certify the business scenarios that CLEC will be using in order to ensure successful transaction processing in production. If multiple CLECs are using a service bureau provider, the service bureau provider need only be certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be certified. Qwest and CLEC shall mutually agree to the business scenarios for which CLEC requires certification. Certification will be granted for the specified release of the application-to-application interface. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel if technically feasible.

New releases of the application-to-application interface may require re-certification of some or all business scenarios. A determination as to the need for re-certification will be made by the Qwest coordinator in conjunction with the release manager of each release. Notice of the need for re-certification will be provided to CLEC as the new release is implemented. The suite of re-certification test scenarios will be provided to CLEC with the initial and final Technical Specifications. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel, if technically feasible. If multiple CLECs are using a service bureau provider, the service bureau provider need only be re-certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be re-certified.

Qwest provides a separate Customer Test Environment (CTE) for the testing of transaction based application-to-application interfaces for pre-order, order, and maintenance/repair. The CTE will be developed for each major release and updated for each point release that has changes that were disclosed but not implemented as part of the major release. Qwest will provide test files for batch/file interfaces (e.g. billing). The CTE for Pre-order and Order currently includes:

- Stand Alone Test Environment (SATE)
- Interoperability Testing
- Controlled Production Testing

The CTE for Maintenance and Repair currently includes:

- CMIP Interface Test Environment (MEDIACC)

Qwest provides initial implementation testing, and migration testing (from one version to the next) for all types of OSS Interface change requests. Controlled Production Testing is also provided for Pre-Order and Order. Such testing provides the opportunity to test the code associated with those OSS Interface exchange requests. The CTE will also provide the opportunity for regression testing of OSS Interface functionality.

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### **10.1 Testing Process**

Qwest will send an industry notification, including testing schedules (see Section 5.0 – Changes to Existing OSS Interfaces), to CLECs so they may determine their intent to participate in the test. CLECs wishing to test with Qwest must participate in at least one joint planning session and determine:

- Connectivity (required)
- Firewall and Protocol Testing (required)
- Controlled Production (required)
- Production Turn-up (required)
- Test Schedule (required)

A joint CLEC-Qwest test plan may also include some or all of the following based on type of testing requested:

- Requirements Review
- Test Data Development
- Progression Testing Phase

Qwest will communicate any agreed upon changes to the test schedule. CLECs are responsible for establishing and maintaining connectivity to the CTE.

Provided a CLEC uses the same software components and similar connectivity configuration as it uses in production, the CLEC should, in general, experience response times similar to production. However, this environment is not intended for volume testing. The CTE contains the appropriate applications for pre-ordering and Local Service Request (LSR) ordering up to but not including the service order processor. Qwest intends to include the service order processor as part of the SATE component of the CTE by the end of 2002. Production code problems identified in the test environment will be resolved by using the Production Support process as outlined in Section 11.0.

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## **11.0 Production Support**

### **11.1 Notification of Planned Outages**

Planned Outages are reserved times for scheduled maintenance to Operations Support Systems (OSS). Qwest sends associated Notifications to all CLECs. Planned Outage Notifications must include:

- Identification of the subject OSS.
- Description of the scheduled OSS maintenance activity.
- Impact to the CLECs (e.g. geographic area, products affected, system implications, and business implications).
- Scheduled date and scheduled start and stop times.
- Work around, if applicable.
- Qwest contact for more information on the scheduled OSS maintenance activity.

Planned Outage Notifications will be sent to CLECs and appropriate Qwest personnel within 2 days of the scheduling of the OSS maintenance activity.

### **11.2 Newly Deployed OSS Interface Release**

Following the release production date of an OSS Interface change, Qwest will use production procedures for maintenance of software as outlined below. Problems encountered by the CLEC should be reported to the IT Wholesale Systems Help Desk (IT Help Desk). Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest, as set forth in Section 11.3. Problems reported will be known as IT Trouble Tickets. A week after the deployment of an IMA Release into production, Qwest will host a conference call with the CLECs to review any identified problems and answer any questions pertaining to the newly deployed software. Qwest will follow CMP process for documenting the meeting (includes issues/action items and status/solution). Issues will be addressed with specific CLECs and results/status will be reviewed at the next Monthly OSS CMP Meeting.

### **11.3 Request for a Production Support Change**

The IT Help Desk supports Competitive Local Exchange Carriers who have questions regarding connectivity, outputs, and system outages. The IT Help Desk serves as the first point of contact for reporting trouble. If the IT Help Desk is unable to assist the CLEC, it will refer information to the proper subject matter expert, also known as Tier 2 or Tier 3 support, who may call the CLEC directly. Often, however, an IT Help Desk representative will contact the CLEC to provide information or to confirm resolution of the trouble ticket.

Qwest will assign each CLEC-generated and Qwest-generated IT Trouble ticket a Severity Level 1 to 4, as defined in Section 11.5. Severity 1 and Severity 2 IT trouble tickets will be implemented immediately by means of an emergency release of process, software or documentation (known as a patch). If Qwest and CLEC deem implementation is not timely, and

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a work around exists or can be developed, Qwest will implement the work around in the interim. Severity 3 and Severity 4 IT trouble tickets may be implemented when appropriate taking into consideration upcoming patches, major releases and point releases and any synergies that exist with work being done in the upcoming patches, major releases and point releases.

The first time a trouble is reported by Qwest or CLEC, the Qwest IT Help Desk will assign a IT Trouble Ticket tracking number, which will be communicated to the CLEC at the time the CLEC reports the trouble. The affected CLEC(s) and Qwest will attempt to reach consensus on resolution of the problem and closing the IT Trouble Ticket. If no consensus is reached, any party may use the Technical Escalation Process described in Section (X). When the IT Trouble Ticket has been closed, Qwest will notify CLECs with one of the following disposition codes:

- No Trouble Found – to be used when Qwest investigation indicates that no trouble exists in Qwest systems.
- Trouble to be Resolved in Patch – to be used when the IT Trouble Ticket will be resolved in a patch. Qwest will provide a date for implementation of the patch. This is typically applied to Severity 1 and Severity 2 troubles, although Severity 3 and Severity 4 troubles may be resolved in a patch where synergies exist.
- CLEC Should Submit CMP CR – to be used when Qwest’s investigation indicates that the System is working pursuant to the Technical Specifications (unless the Technical Specifications are incorrect), and that the IT Trouble Ticket is requesting a systems change that should be submitted as a CMP CR.
- Date TBD – to be used when the IT Trouble Ticket is not scheduled to be resolved in a patch or change, but Qwest may resolve in a patch, release, or otherwise, if possible where synergies exist. This disposition is applied to Severity 3 and Severity 4 troubles.

Qwest will track "Date TBD" trouble tickets and report status and resolution of these trouble tickets and associated systems work on its CMP website. The status of these trouble tickets will be regularly discussed in CMP meetings.

For "Date TBD" trouble tickets, either Qwest or a CLEC may initiate the Change Request to correct the problem. (See Section 3.0 for CR Initiation.) If the initiating party knows that the CR relates to a trouble ticket, it will identify the trouble ticket number on the CR.

Instances where Qwest or CLECs misinterpret Technical Specifications and/or business rules must be addressed on a case-by-case basis. All parties will take all reasonable steps to ensure that any disagreements regarding the interpretation of a new or modified OSS Interface are identified and resolved during the change management review of the change request.

#### **11.4 Reporting Trouble to IT**

Qwest will open a trouble ticket at the time the trouble is first reported by CLEC or detected by Qwest. The IT Help Desk representative will communicate the ticket number to the CLEC at the time the CLEC reports the trouble.

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If a ticket has been opened, and subsequent to the ticket creation, CLECs call in on the same problem, and the IT Help Desk recognizes that it is the same problem, a new ticket is not created. The IT Help Desk documents each subsequent call in the primary ticket.

If one or more CLECs call in on the same problem, but it is not recognized as the same problem, one or more tickets may be created. When the problem is recognized as the same, one of the tickets becomes the primary ticket, and the other tickets are linked to the primary ticket. When the problem is closed, the primary and all related tickets will be closed.

### **11.5 Severity Levels**

Severity level is a means of assessing and documenting the impact of the loss of functionality to CLEC(s) and impact to the CLEC's business. The severity level gives restoration or repair priority to problems causing the greatest impact to CLEC(s) or its business.

Guidelines for determining severity levels are listed below. Severity level may be determined by one or more of the listed bullet items under each Severity Level (the list is not exhaustive). Examples of some trouble ticket situations follow. Please keep in mind these are guidelines, and each situation is unique. The IT Help Desk representative, based on discussion with the CLEC, will make the determination of the severity level and will communicate the severity level to the CLEC at the time the CLEC reports the trouble. If the CLEC disagrees with the severity level assigned by the IT Help Desk personnel, the CLEC may escalate using the Technical Escalation Process. (See Section X)

#### **Severity 1: Critical Impact**

- Critical.
- High visibility.
- A large number of orders or CLECs are affected.
- A single CLEC cannot submit its business transactions.
- Affects online commitment.
- Production or cycle stopped – priority batch commitment missed.
- Major impact on revenue.
- Major component not available for use.
- Many and/or major files lost.
- Major loss of functionality.
- Problem can not be bypassed.
- No viable or productive work around available.

#### **Examples:**

- Major network backbone outage without redundancy.
- Environmental problems causing multiple system failures.
- Large number of service or other work order commitments missed.
- A software defect in an edit which prevents any orders from being submitted.

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**Severity 2: Serious Impact**

- Serious.
- Moderate visibility.
- Moderate to large number of CLECs, or orders affected.
- Potentially affects online commitment.
- Serious slow response times.
- Serious loss of functionality.
- Potentially affects production – potential miss of priority batch commitment.
- Moderate impact on revenue.
- Limited use of product or component.
- Component continues to fail. Intermittently down for short periods, but repetitive.
- Few or small files lost.
- Problems may have a possible bypass; the bypass must be acceptable to CLECs.
- Major access down, but a partial backup exists.

**Examples:**

- A single company, large number of orders impacted
- Frequent intermittent logoffs.
- Service and/or other work order commitments delayed or missed.

**Severity 3: Moderate Impact**

- Low to medium visibility.
- Low CLEC, or low order impact.
- Low impact on revenue.
- Limited use of product or component.
- Single CLEC device affected.
- Minimal loss of functionality.
- Problem may be bypassed; redundancy in place. Bypass must be acceptable to CLECs.
- Automated workaround in place and known. Workaround must be acceptable to CLECs.

**Example:**

- Hardware errors, no impact yet.

**Severity 4: Minimal Impact**

- Low or no visibility.
- No direct impact on CLEC.
- Few functions impaired.
- Problem can be bypassed. Bypass must be acceptable to CLECs.
- System resource low; no impact yet.
- Preventative maintenance request.

**Examples:**

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- Misleading, unclear system messages causing confusion for users.
- Device or software regularly has to be reset, but continues to work.

#### **11.6 Status Notification for IT Trouble Tickets**

There are two types of status notifications for IT Trouble Tickets:

- Ticket Notifications: for tickets that relate to only one reporting CLEC
- Event Notifications: for tickets that relate to more than one CLEC
- Event Notifications are sent by Qwest to all CLECs who subscribe to the IT Help Desk as described in Section (X). Event Notifications will include ticket status (e.g. open, no change, resolved) and as much of the following information as is known to Qwest at the time the notice is sent:
  - Description of the problem
  - Impact to the CLECs (e.g. geographic area, products affected, business implications)
  - Estimated resolution date and time if known
  - Resolution if known
  - Severity level
  - Trouble ticket number(s), date and time
  - Work around if defined
  - Qwest contact for more information on the problem
  - System affected
  - Escalation information as available

Both types of notifications will be sent to the CLECs and appropriate Qwest personnel within the time frame set forth in the table below and will include all related system trouble ticket number(s).

#### **11.6 Notification Intervals**

Notification Intervals are based on the severity level of the ticket. "Notification Interval for any Change in Status" means that a notification will be sent out within the time specified from the time a change in status occurs. "Notification Interval for No Change in Status" means that a notification will be sent out on a recurring basis within the time specified from the last notification when no change in status has occurred, until resolution. "Notification Interval upon Resolution" means that a notification will be sent out within the time specified from the resolution of the problem.

Notification will be provided during the IT Help Desk normal hours of operation. Qwest will continue to work severity 1 problems outside of Help Desk hours of operation which are Monday-Friday 6:00 a.m. - 8:00 p.m. Mountain time and Saturday 7:00 a.m. - 3:00 p.m. Mountain time, and will communicate with the CLEC(s) as needed. A severity 2 problem may be worked outside the IT Help Desk normal hours of operation on a case-by-case basis.

The chart below indicates the response intervals a CLEC can expect to receive after reporting a trouble ticket to the IT Help Desk.

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<b>Severity Level of Ticket</b>	<b>Notification interval for initial ticket</b>	<b>Notification Interval for any Change in Status</b>	<b>Notification Interval for No Change in Status</b>	<b>Notification Interval upon Resolution</b>
Severity Level 1	Immediate acceptance	Within 1 hour	1 hour	Within 1 hour
Severity Level 2	Immediate acceptance	Within 1 hour	1 hour	Within 1 hour
Severity Level 3	Immediate acceptance	Within 4 hours	48 hours	Within 4 hours
Severity Level 4	Immediate acceptance	Within 8 hours	48 hours	Within 8 hours

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## **12.0 TRAINING**

*All changes to existing interfaces, as well as the introduction of new interfaces, will be incorporated into CLEC training.*

*Qwest may conduct CLEC workshops. CLEC workshops are organized and facilitated by Qwest and can serve any one of the following purposes:*

- Educate CLECs on a particular process or business function*
- Collect feedback from CLECs on a particular process or business function*
- Provide a forum for Qwest or CLECs to lobby for the implementation of a particular process or business function*

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## **13.0 ESCALATION PROCESS**

### **13.1 Guidelines**

- The escalation process will include items that are defined as within the CMP scope.
- The decision to escalate is left to the discretion of the CLEC, based on the severity of the missed or unaccepted response/resolution.
- Escalations may also involve issues related to CMP itself, including the administration of the CMP.
- The expectation is that escalation should occur only after change management procedures have occurred per the CMP.

### **13.2 Cycle**

- Item must be formally escalated as an e-mail sent to the Qwest CMP escalation e-mail address, [http://www.qwest.com/wholesale/cmp/escalations\\_dispute.html](http://www.qwest.com/wholesale/cmp/escalations_dispute.html). Subject line of the escalation e-mail must include:
  - CLEC Company name
  - "ESCALATION"
  - Change Request (CR) number and status, if applicable
- Content of e-mail must enclose appropriate supporting documentation, if applicable, and to the extent that the supporting documentation does not include the following information, the following must be provided:
  - Description of item being escalated
  - History of item
  - Reason for Escalation
  - Business need and impact
  - Desired CLEC resolution
  - CLEC contact information including Name, Title, Phone Number, and e-mail address
  - CLEC may request that impacted activities be stopped, continued or an interim solution be established.
- Qwest will acknowledge receipt of the complete escalation e-mail with an acknowledgement of the e-mail no later than the close of business of the following business day. If the escalation email does not contain the following specified information Qwest will notify the CLEC by the close of business on the following business day, identifying and requesting information that was not originally included. When the escalation email is complete, the acknowledgement email will include:
  - Date and time of escalation receipt
  - Date and time of acknowledgement email
  - Name, phone number and email address of the Qwest Director, or above, assigned to the escalation.
- Qwest will post escalated issue and any associated responses on the CMP web site within 1 business day of receipt of the complete escalation or response. Qwest will give notification that an escalation has been requested via the Industry Mail Out process

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- Any other CLEC wishing to participate in the escalation must submit an e-mail notification to the escalation URL within one (1) business day of the mail out. The subject line of the e-mail must include the title of the escalated issue followed by "ESCALATION PARTICIPATION"
- Qwest will respond with a binding position e-mail including supporting rationale as soon as practicable, but no later than:
  - For escalated CRs, seven (7) calendar days of sending the acknowledgment e-mail.
  - For all other escalations, fourteen (14) calendar days of sending the acknowledgment e-mail.
- The escalating CLEC will respond to Qwest within seven (7) calendar days with a binding position e-mail.
- When the escalation is closed, the resolution will be subject to the CMP.

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#### **14.0 DISPUTE RESOLUTION PROCESS**

CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP. In the event that an impasse issue develops, a party may pursue the dispute resolution processes set forth below. Item must be formally noticed as an e-mail sent to the Qwest CMP Dispute Resolution e-mail address, [http://www.qwest.com/wholesale/cmp/escalations\\_dispute.html](http://www.qwest.com/wholesale/cmp/escalations_dispute.html). Subject line of the e-mail must include:

- CLEC Company name
- "Dispute Resolution"
- Change Request (CR) number and status, if applicable
- Content of e-mail must enclose appropriate supporting documentation, if applicable, and to the extent that the supporting documentation does not include the following information, the following must be provided:
  - Description of item
  - History of item
  - Reason for Escalation
  - Business need and impact
  - Desired CLEC resolution
  - CLEC contact information including Name, Title, Phone Number, and e-mail address
  - Qwest will acknowledge receipt of the complete Dispute Resolution e-mail within one (1) business day
- Qwest or any CLEC may suggest that the issue be resolved through an Alternative Dispute Resolution (ADR) process, such as arbitration or mediation using the American Arbitration Association (AAA) or other rules. If the parties agree to use an ADR process and agree upon the process and rules to be used, including whether the results of the ADR process are binding, the dispute will be resolved through the agreed-upon ADR process.
- Without the necessity for a prior ADR Process, Qwest or any CLEC may submit the issue, following the commission's established procedures, with the appropriate regulatory agency requesting resolution of the dispute. This provision is not intended to change the scope of any regulatory agency's authority with regard to Qwest or the CLECs.

This process does not limit any party's right to seek remedies in a regulatory or legal arena at any time.

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**DEFINITION OF TERMS**

<i>Term</i>	<i>Definition</i>
<b>CLEC</b>	<i>Party originating a request (LSR)</i>
<b>INTERFACE</b>	<p><i>A mechanism to communicate between CLEC/provider or trading partners (e.g., paper, GUI, gateway)</i></p> <ul style="list-style-type: none"> <li>• <i>A new interface is Qwest's introduction of paper, GUI, gateway, etc., to all CLECs for the first time.</i></li> <li>• <i>A change to an interface may include:</i> <ul style="list-style-type: none"> <li>• <i>Paper to GUI</i></li> <li>• <i>Changes of EDI to CORBA</i></li> </ul> </li> </ul>
<b>ISSUE</b>	<i>The specific OBF LSOG Issue (e.g., Local Services Ordering Guidelines (LSOG) document, Issue 5, August 2000)</i>
<b>PROVIDER</b>	<i>Party receiving request (LSR)</i>
<b>RELEASE</b>	<i>Implementation of version (Type 3 change) using a particular interface. A release may include enhancements or customization (Type 1,2,4 or 5 change) to an LSOG version by a provider as well as CLEC/provider business requirements.</i>
<b>VERSION</b>	<i>The supported OBF LSOG Issue (e.g., Local Services Ordering Guidelines (LSOG) document, Issue 5, August 2000) (Type 3 change)</i>

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**APPENDIX A: CHANGE REQUEST FORM AND CHECKLIST**

**I. Appendix A-1: Change Request Form**

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(1) Internal Reference # \_\_\_\_\_ (2) Date Change Request Submitted \_\_\_/\_\_\_/\_\_\_

- (3)  **TYPE 1 (EMERGENCY)** (4)  **TYPE 2 (REGULATORY)** (5)  **TYPE 3 (INDUSTRY)**  
 Severity 1 (stops production)  
 Severity 2 (impacts production)  
 Severity 3 (major w/work around)

(6)  **TYPE 4 (PROVIDER)** (7)  **TYPE 5 (CLEC)**

(4) CLEC \_\_\_\_\_

(5) Originator \_\_\_\_\_ (6) Phone \_\_\_\_\_

(7) Originator's Email Address \_\_\_\_\_ (8) Fax \_\_\_\_\_

(9) Alternate Contact \_\_\_\_\_ (10) Alt Phone # \_\_\_\_\_

(11) Title of Change \_\_\_\_\_

(12) **Category**  Add New Functionality  Change Existing

(13) **Interfaces Impacted**

- Pre-Ordering
- Ordering
- Maintenance
- Manual
- Billing
- Business Rules
- Other

(14) *Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.)*

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(15) *Known dependencies*

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*(16) List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)*

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***This Section to be completed by Provider ONLY.***

(17) Change Request Log # \_\_\_\_\_ (18) Clarification  Yes  No

(19) Clarification Request Sent \_\_\_/\_\_\_/\_\_\_ (20) Clarification Response Due \_\_\_/\_\_\_/\_\_\_

(21) Status \_\_\_\_\_

(22) Change Request Review Date \_\_\_/\_\_\_/\_\_\_ (23) Target Implementation Date \_\_\_/\_\_\_/\_\_\_

(24) Last Modified By \_\_\_\_\_ (25) Date Modified \_\_\_/\_\_\_/\_\_\_

**(26) Change Request Activity**

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**(27) Rejected Change Request**

- Cost/benefits
- Resource commitments
- Industry or regulatory direction
- Provider direction
- Other

(28) Cancellation Acknowledgment CLEC \_\_\_\_\_ Provider \_\_\_\_\_ Date \_\_\_/\_\_\_/\_\_\_

(29) Request Escalation  Yes  No

**(30) Escalation Considerations**

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(31) Agreed Release Date \_\_\_/\_\_\_/\_\_\_

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## 9.0 Appendix A-2: Change Request Form Checklist

All fields will be validated before Change Request is returned for clarification.

<b>Field</b>	<b>Checklist</b>	<b>Description</b>	<b>Instructions</b>	<b>Action Required</b>
1	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into Qwest's change control process.	No action	
2	Mandatory	Date Change Request sent to Provider.	Return to Sender	Date entry required
3	Mandatory	Indicate type of Change Request: CLEC or Provider initiated Industry Standard or Regulatory.	Return to Sender	Company designation required
4	Mandatory	Enter company name for the Change Request.	Return to Sender	Company name required
5	Mandatory	Enter originating company's Change Control Initiator's name.	Return to Sender	Initiator's name required
6	Mandatory	Enter originating company's Change Control Initiator's phone number.	Return to Sender	Initiator's phone number required
7	Mandatory	Enter originating company's Change Control Initiator's Email address.	Return to Sender	Initiator's Email address required
8	Mandatory	Enter originating company's Change Control Initiator's fax number.	Return to Sender	Initiator's fax number required
9	Mandatory	Enter originating company's alternate contact name.	Return to Sender	Alternate contact name required
10	Mandatory	Enter originating company's alternate contact phone number.	Return to Sender	Alternate contact number required
11	Mandatory	For the purpose of referencing the Change Request, assign a short, but descriptive name.	Return to Sender	Title required – maximum length 40 characters.
12	Mandatory	Identify request category for the Change Request.	Return to Sender	Category required
13	Mandatory	Identify originating company assessment of impact	Return to Sender	Entry required
14	Mandatory	Describe the proposed Change Request, indicating the purpose and benefit of request. If additional space is needed, use additional sheet.	Return to Sender	Description of Change Request required
15	Mandatory	Indicate any known dependencies relative to the Change Request. If none are known, enter "None known".	Return to Sender	Entry required

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<b>Field</b>	<b>Checklist</b>	<b>Description</b>	<b>Instructions</b>	<b>Action Required</b>
16	Mandatory	Indicate whether additional information accompanies/supports the proposed Change Request. If yes, list all documents attached or reference where they can be found, including internet address and standards reference, if applicable.	Return to Sender	Supporting documentation must accompany request
17	Mandatory Provider	A Change Request Log Number generated by the "Change Request Logging system" upon receipt of the Change Request. The number should be sent back to the initiator on the acknowledgment receipt. This # will be used to track the Change Request.	Return to Sender	Log number – system generated
18	Conditional Provider	Indicates whether clarification is needed on the Change Request.	Return to Sender	
19	Conditional Provider	Date clarification request sent to Initiator.		
20	Conditional Provider	Date clarification due back from Initiator.	Return to Sender	
21	Mandatory Provider	Indicate status of proposed Change Request (i.e., clarification, validation, pending, etc)		
22	Mandatory Provider	Assign date when Change Request will appear on agenda.	Return to Sender	
23	Mandatory Provider	A soft date for implementation. Updated based on Candidate Release Package info.		
24	Mandatory Provider	Field that communicates who last updated the request.		
25	Mandatory Provider	Field that communicates when the last update occurred.		
26	Mandatory Provider	Change Request results captured from the Change Review meeting.		
27	Conditional Provider	Cancelled Change Request reasoning.	Return to Sender	
28	Conditional Provider	Concurrence with Change Request originating company. Show date of concurrence.	Return to Sender	
29	Conditional Provider	Change Request Escalation indication.		
30	Conditional Provider	Detailed description of the escalation considerations.		
31	Mandatory Provider	Indicate agreed release date from Project Release Plan.		
32	Mandatory Provider	Results of Internal Defect Validation		

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<b>Field</b>	<b>Checklist</b>	<b>Description</b>	<b>Instructions</b>	<b>Action Required</b>
16	Mandatory	Indicate whether additional information accompanies/supports the proposed Change Request. If yes, list all documents attached or reference where they can be found, including internet address and standards reference, if applicable.	Return to Sender	Supporting documentation must accompany request
17	Mandatory Provider	A Change Request Log Number generated by the "Change Request Logging system" upon receipt of the Change Request. The number should be sent back to the initiator on the acknowledgment receipt. This # will be used to track the Change Request.	Return to Sender	Log number – system generated
18	Conditional Provider	Indicates whether clarification is needed on the Change Request.	Return to Sender	
19	Conditional Provider	Date clarification request sent to Initiator.		
20	Conditional Provider	Date clarification due back from Initiator.	Return to Sender	
21	Mandatory Provider	Indicate status of proposed Change Request (i.e., clarification, validation, pending, etc)		
22	Mandatory Provider	Assign date when Change Request will appear on agenda.	Return to Sender	
23	Mandatory Provider	A soft date for implementation. Updated based on Candidate Release Package info.		
24	Mandatory Provider	Field that communicates who last updated the request.		
25	Mandatory Provider	Field that communicates when the last update occurred.		
26	Mandatory Provider	Change Request results captured from the Change Review meeting.		
27	Conditional Provider	Cancelled Change Request reasoning.	Return to Sender	
28	Conditional Provider	Concurrence with Change Request originating company. Show date of concurrence.	Return to Sender	
29	Conditional Provider	Change Request Escalation indication.		
30	Conditional Provider	Detailed description of the escalation considerations.		
31	Mandatory Provider	Indicate agreed release date from Project Release Plan.		
32	Mandatory Provider	Results of Internal Defect Validation		

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**APPENDIX B: CHANGE REQUEST PRIORITIZATION FORM**

<b>Item #</b>	<b>Change Request #</b>	<b>Description of Change Request</b>	<b>CLEC Rankings</b>	<b>Comments</b>
		<b>Title:</b>  <b>Description:</b>  <b>Process:</b> <b>System:</b> <b>Primary Area:</b> <b>LSOG Version:</b>  <b>Initiator/Date:</b>	Overall =  Cust #1 = Cust #2 = Cust #3 = Cust #4 = Cust #5 = Cust #6 =	
		<b>Title:</b>  <b>Description:</b>  <b>Process:</b> <b>System:</b> <b>Primary Area:</b> <b>LSOG Version:</b>  <b>Initiator/Date:</b>	Overall =  Cust #1 = Cust #2 = Cust #3 = Cust #4 = Cust #5 = Cust #6 =	
		<b>Title:</b>  <b>Description:</b>  <b>Process:</b> <b>System:</b> <b>Primary Area:</b> <b>LSOG Version:</b>  <b>Initiator/Date:</b>	Overall =  Cust #1 = Cust #2 = Cust #3 = Cust #4 = Cust #5 = Cust #6 =	

<sup>1</sup> Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users

<sup>2</sup> Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

**Note-Throughout this document italicized text represents OBF language not yet discussed by the CLEC-Qwest Re-Design Team.**

**APPENDIX C: CMP PRIORITIZATION PROCESS EXAMPLE**

**Example:** *Change Request E2 is prioritized highest. Since E3 and E5 are tied, they will be re-ranked and prioritized according to the re-ranking.*

<i>Pre-order</i>	<i>CLEC #1</i>	<i>CLEC #2</i>	<i>CLEC #3</i>	<i>TOTAL</i>	<i>Average</i>
<i>E1</i>	5	5	5	15	5
<i>E2</i>	1	2	1	4	1
<i>E3</i>	3	1	5	9	3
<i>E4</i>	5	3	4	12	4
<i>E5</i>	2	5	2	9	3
<i>E6</i>	4	4	3	11	4

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# **EXHIBIT**

# **B**

**Change Management Process (CMP) Improvements – 11-26-01**  
Revised 12-13-01

<b>Improvement</b>	<b>Implementation Date(s)</b>
Standard Naming Convention	August 2001
Web Site Improvements - Design - Search Capabilities	October 2001
CMP Process Improvements - CR Clarification Meetings - Meeting Distribution Package - Meeting Minutes - CR Tracking and Reporting Database - CR Project Management	August – November 2001
Escalation and Dispute Resolution Process Redesign Improvements - Process - Web Site	November 2001
Interim Exception Process	September 2001
OSS Interface 12 Month Development View	November 2001
CLEC/Qwest Initiated OSS Interface CR Process Redesign Improvements - Process - Form	October – November 2001
CLEC Initiated Product and Process CR Process Redesign Improvements - Process - Form	October – November 2001
PCAT Red-Line	Started November 2001
Tech-Pub Red-Line	Started October 2001
Point of Contact List	October 2001
Established CMP Full Day Meetings	October 2001
Prioritization of Qwest Originated OSS Interface CRs Redesign Improvements	August – November 2001 Language scheduled to be completed in Redesign in Jan 2002
Introduction of New OSS Interface	Ready when applicable
Web Tool to Support CLEC Comments on CRs	November 2001
Retirement of OSS Interface	Ready when applicable
Changes to an Existing OSS Application to Application Interface - Draft Technical Specifications Walkthrough - CLEC Comment Cycle - Final Technical Specifications - CLEC Testing	Effective with IMA 10.0 Release
Changes to an Existing GUI - Draft User Guide - CLEC Comment Cycle - Final User Guide	Effective with IMA 10.0 Release
OSS IMA EDI Versioning	In Effect
Interface Testing Environment - SATE	In Place Language scheduled to be completed in Redesign in Jan 2002