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BEFORE THE ARIZONA CORPORATION COMMISSION

47 U.S.C. § 271(c)(2)(B)(iv)
TELECOMMUNICATIONS CONTROL

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
§ 271 OF THE
TELECOMMUNICATIONS ACT OF
1996.

DOCKET NO. T-00000B-97-0238

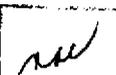
NOTICE OF SUPPLEMENTAL AUTHORITY: CHECKLIST ITEM 4

Qwest Corporation ("Qwest") submits the attached Discrete Test Report for ROC OSS Master Test Plan 12.7 dated January 31, 2002. Qwest submits the attached material in support of Qwest's compliance with checklist item 4, 47 U.S.C. § 271(c)(2)(B)(iv). Specifically, Qwest submits this supplemental authority in support of its claim that Qwest should not be required to create the functionality for CLECs to perform MLTs on a pre-order basis (AIL Loop 24) and that Qwest should not be required to provide direct access to its Loop Facilities Assignment System ("LFACS") database (AIL Loop 4). The attached document supports Qwest's assertions that it provides loop make up information to CLECs in parity with itself.

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Arizona Corporation Commission
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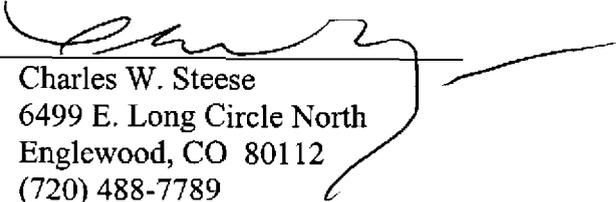
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DATED this 19th day of February, 2002

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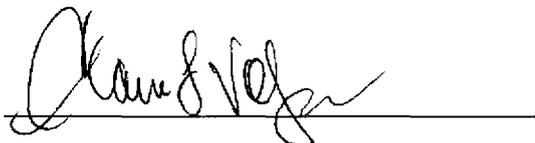
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12.7. Test Results: Loop Qualification Process Evaluation (Test 12.7)

1.0 Description

The Loop Qualification Process Evaluation was a review of the loop qualification processes and procedures developed and employed by Qwest to support both retail and wholesale customers. Operational analysis techniques were used to determine if parity exists in the design, implementation, and use of Qwest's loop qualification process. Additionally, the Loop Qualification Evaluation assessed remedial¹ options available for both the retail and wholesale processes.

2.0 Method

This section summarizes the test execution method.

2.1 Business Process Description

This section provides an overview of the Qwest retail and wholesale loop qualification processes.

2.1.1 Qwest Retail Loop Qualification Process

Qwest retail customers are able determine whether or not a loop qualifies for Digital Subscriber Line (DSL) service by using one of the following methods:

- Qwest retail Web site tool (orderdsl.qwest.com)
- Telephone inquiry
- Email or fax inquiry.

The retail Web site tool allows Qwest's end-user customers to submit a query by entering their existing telephone number (TN) to determine whether the loop dedicated to that TN qualifies for DSL service. If the customer receives a positive response, the customer can then request DSL service.

Retail customers can submit requests for DSL service via telephone, email, or fax. In these cases, a Qwest retail customer service representative performs the loop qualification by using the Q City/QSERV Loop Qualification Tool².

The Q City/QSERV tool allows the Qwest representative to submit a query using either the customer TN or street address. The customer TN is used for most requests. QSERV returns one of three possible responses:

- **YES** – indicates that the customer's loop qualifies for Qwest DSL service at given available data transmission speed(s), and that an order for DSL service can be submitted.

¹ Remedial options are those available to a CLEC for instances in which the loop that it is trying to qualify for Digital Subscriber Line (DSL) service does not. Examples include Integrated Services Digital Network (ISDN) qualification or modifications to the loop in question.

² With respect to this tool, Facility Check represents the backend database. Q City/QSERV represents the Graphical User Interface (GUI).

- *NO* – indicates that the customer’s loop does not qualify for DSL service. A brief explanation is provided in the query response (e.g., distance from Central Office [CO] is too great).
- *NOT DETERMINED* – indicates that the database does not contain sufficient information for Q City to determine whether or not the customer qualifies for service.

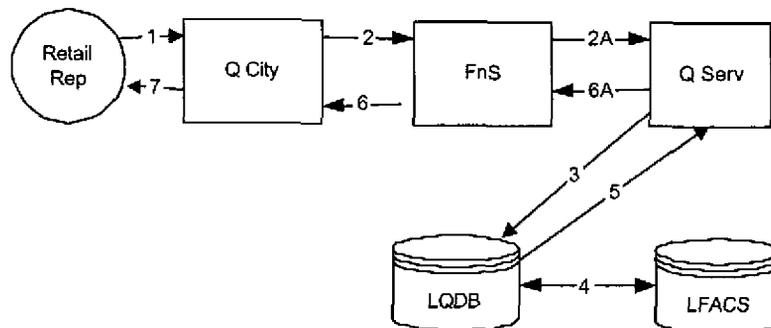
Qwest retail customers do not have remedial options available to them when the specified loop does not support DSL service. For example, Qwest does not provide conditioning services³ in order to qualify customers for DSL service if the specified loop does not support DSL service. In such instances, customers are informed that their TNs are not currently eligible for the service.

In the event that the specified loop yields a “not determined” result, the customer can request that Qwest take further action to determine whether or not the loop qualifies. In such a case, the Qwest representative can submit an inquiry to a team managed by Pinnacle Peak, an outsourcing firm that uses Qwest network databases and systems to determine whether a loop qualifies for service. This team performs network analysis to make a final determination, and informs the Qwest service representative of the result. The Qwest representative then advises the customer of the result of the investigation. The standard interval for receipt of a response by the customer is 10 business days. The customer has no further remedial options if this team determines that a loop does not qualify for service.

2.1.2 Qwest Retail Loop Qualification System Description

The diagram below illustrates the systems and flow that comprise Qwest’s retail loop qualification query process:

Figure 12.7-1: Qwest Retail Loop Qualification Query Process



³ Conditioning services include removal of bridge taps and/or load coils.

1. Representative accesses Q City Loop Qualification by telephone number (TN); Representative enters TN.
2. Q City sends telephone number to Q Serv.
- 2A. Data is transferred from Q City to Q Serv via FnS.
3. Q Serv pulls Raw Loop Data (RLD) to make loop qualification determination from Loop Qualification Data Base (LQDB).
4. LQDB checks Loop Facilities Assignment & Control System (LFACS) to verify that data is current.
5. LQDB returns RLD for TN(s).
6. Q Serv uses RLD to determine loop qualification, and sends loop qualification results to Q City.
- 6A. Data is transferred from Q Serv to Q City via FnS.
7. Q City sends loop qualification results to representative.

Process Description: The Q City interface submits the query information to Q Serv. Q Serv is a middleware application that collects raw loop data from the LQDB, and uses an algorithm to determine whether or not the loop qualifies, based on the technical specifications for Qwest DSL service.

System Performance/Database Updates: The LFACS database is Qwest's central repository for loop data. It serves as the source database for the loop data in the LQDB, which is updated with revised LFACS data on a nightly basis. The two databases are synchronized each month. As part of the loop qualification query process, the LQDB also queries a "recent changes" field in the LFACS database. If this query indicates that the LFACS information has been updated, the new LFACS information is populated into the LQDB, and is used as the basis for the loop qualification query.

2.1.3 Qwest Wholesale Loop Qualification Process

CLECs can determine whether a loop qualifies for DSL service by using one of the following methods:

- Qwest Interconnect Mediated Access (IMA)
- Qwest wholesale Web site tool
- Telephone inquiry to the Interconnect Service Center (ISC)
- Email or fax inquiry to the ISC.

IMA is the primary tool used by CLECs to perform loop qualifications. The other methods serve as backups, in the event that a CLEC experiences difficulty with the IMA tools, described below. Qwest makes several loop qualification tools available through IMA. They include:

- MegaBit/Qwest DSL Qualification Tool⁴ – used by resellers to qualify loops, based on the specific technical parameters for Qwest DSL service
- Asymmetrical Digital Subscriber Line (ADSL) Unbundled Loop Qualification Tool – used by facility-based CLECs to qualify loops, based on industry standard technical specifications for ADSL service

⁴ As of the date of this report, the MegaBit Qualification tool has been renamed the Qwest DSL Qualification tool.

- Raw Loop Data Tool – used to access specific loop makeup characteristics, including specific loop modifications, segment characteristics, distance from the CO, and presence of load coils or bridge taps.

CLECs use the appropriate IMA tool to qualify a customer loop prior to submitting an order to Qwest for DSL service. Raw loop data can be used to examine the specific loop makeup characteristics for a discrete TN or address. CLECs can also download bulk raw loop data in comma-delimited format for use in their own loop qualification applications.

The MegaBit/Qwest DSL and ADSL Unbundled Loop Qualification tools allow CLECs to submit queries by either TN or address. The IMA response for both tools indicates whether or not the specified loop qualifies for DSL service, and provides a brief description of the loop make-up characteristics.

The MegaBit/Qwest DSL tool provides the same response as the Q City tool described above: “yes,” “no,” or “not determined.” The result is based on the same data and algorithms that are used in the retail loop qualification process (see Section 2.1.4 below for further detail).

Resellers of Qwest DSL service do not have remedial options available to them in the event that the specified loop does not support DSL service. As is the case with the retail process, Qwest does not provide conditioning services in order to qualify customers for DSL service. Qwest does provide an “auto-qualification” feature through IMA. This tool allows CLECs to establish an automatic query that will periodically check a loop to determine whether its qualification status has changed. If a loop becomes eligible at a later date, the CLEC is notified via email.

Facility-based CLECs who order unbundled loop products have the option of ordering loop-conditioning services from Qwest in order to qualify customers for DSL service. Examples of such services include the removal of load coils and bridge taps from a specified loop.

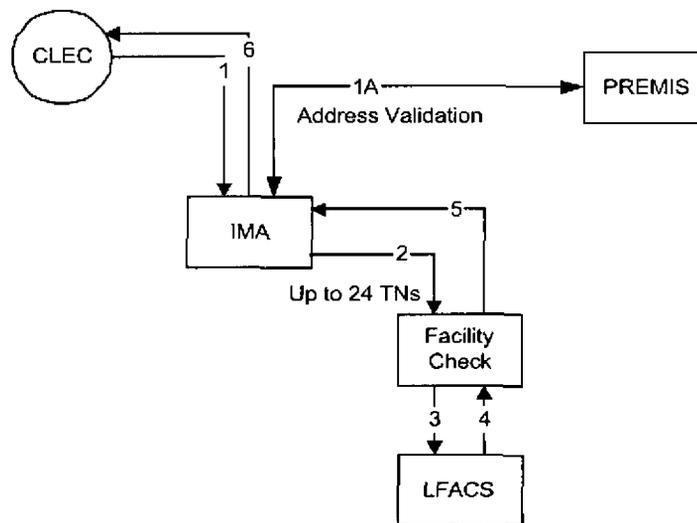
Qwest provides support to CLECs through its ISCs. Resellers receive support from the Complex Resale ISC in Minneapolis, MN. Facility-based DSL providers receive support from the Unbundled Loop ISC in Duluth, MN. These ISCs are staffed by Service Delivery Coordinators (SDCs), who are trained to process orders for DSL-related products and services. SDCs perform loop qualifications on DSL orders using the MegaBit/Qwest DSL qualification tool, which returns loop results in the same manner (“yes,” “no,” or “not determined”) as the tools used by CLECs. The MegaBit/Qwest DSL qualification tool is the same tool used by Qwest retail representatives.

Escalations are initially processed by an assigned Qwest SDC. The escalation then goes to a dedicated escalation SDC, who completes the Online VP request form, and sends it on to the Network VP. The Network VP responds to the SDC within twenty-four hours. The SDC who has ownership of the order contacts the customer with the escalation outcome.

System Performance/Database Updates: The LFACS and LQDB databases are the same databases used for retail loop qualification. The update procedures described in Section 2.1.2 also apply to this section.

The flow for the Unbundled ADSL Loop Qualification process is depicted below. The ADSL Loop Qualification Tool is used prior to submitting a Local Service Request (LSR) for an Unbundled Local Loop. This tool enables the CLEC to verify the type of facility and the loop make-up of the Unbundled Local Loop prior to order submission.

Figure 12.7-3: Unbundled ADSL Loop Qualification Process



1. CLEC accesses IMA for loop qualification by TN; CLEC enters TN.
- 1A. IMA accesses PREMIS to validate addresses or working TNs; PREMIS returns results.
2. IMA sends TN to Facility Check.
3. Facility Check queries LFACS to verify that data is current.
4. LFACS returns data to Facility Check for loop qualification determination.
5. Facility Check sends loop qualification result to IMA.
6. IMA sends loop qualification result to CLEC.

CLECs submit queries via IMA. Address-based queries determine the validated addresses or working TNs in PREMIS. TN data is submitted to Facility Check. Facility Check draws loop make-up characteristics from the LFACS database, and performs algorithms to determine whether the loop will support DSL service. Results are then returned to the CLEC via IMA.

2.2 Scenarios

Scenarios were not applicable to this test.

2.3 Test Targets & Measures

The test targets were the loop qualification processes and procedures used by Qwest to support both retail and wholesale customers. Processes, sub-processes, and evaluation measures are summarized in the following table.

Table 12.7-1: Test Target Cross-Reference

Process	Sub-Process	Evaluation Measure	Test Cross-Reference
Loop Qualification Pre-Order query process	Pre-Order Receipt and Logging	Consistency between wholesale and retail processes	12.7-1-1, 12.7-1-2, 12.7-1-4, 12.7-1-7
Assemble Pre-Order Response	Delivery of Error Messages and Queries	Consistency between wholesale and retail processes	12.7-1-1 – 12.7-1-5, 12.7-1-8
	Delivery of Response	Consistency between wholesale and retail processes	12.7-1-1 – 12.7-1-4, 12.7-1-6, 12.7-1-8
Escalation Process	User-initiated Escalation	Consistency between wholesale and retail processes	12.7-1-3, 12.7-1-8, 12.7-1-9
Process Management	General Management Practices	Consistency between wholesale and retail processes	12.7-1-3, 12.7-1-6, 12.7-1-8, 12.7-1-10
	Performance Measurement Process	Consistency between wholesale and retail processes	12.7-1-3, 12.7-1-8, 12.7-1-10
Capacity Management	Capacity Management Processes and Procedures	Consistency between wholesale and retail processes	12.7-1-10

2.4 Evaluation Methods

KPMG Consulting utilized three methods of data collection for this evaluation. The evaluation included review of Qwest documentation of processes and procedures, management practices, and pre-order processes. Interviews and observations were held with Competitive Local Exchange Carriers (CLECs) to evaluate their collective experiences. In addition, KPMG Consulting conducted interviews and on-site observations with Qwest staff responsible for loop qualification processing.

2.5 Analysis Methods

Information gathered during on-site visits and through data requests was evaluated against criteria defined by KPMG Consulting during the planning phase of the test. One component of this evaluation compared Qwest personnel, processes, and systems used to for wholesale loop qualification to those employed for retail loop qualification, in order to determine whether or not consistencies exist. Another component evaluated data gathered to determine if essential elements of Qwest's processes and systems are present, and whether or not defined process steps are followed.

3.0 Results Summary

This section identifies the discrete evaluation criteria and test results.

3.1 Results & Analysis

The results of this test are presented in the table below. Definitions of evaluation criteria, possible results, and exceptions are provided in Section II.

Table 12.7-2: Evaluation Criteria and Results

Test Cross-Reference	Evaluation Criteria	Result	Comments
12.7-1-1	The end-user information that is required prior to the submission of a loop qualification is the same for wholesale and retail orders.	Satisfied	<p>End-user information that is required prior to the submission of a loop qualification is the same for wholesale and retail orders.</p> <p>Both retail and wholesale loop qualifications can be performed using either an end-user telephone number (TN) or street address.</p> <p>KPMG Consulting confirmed these submission requirements during interviews with CLEC subject matter experts (SMEs) who are responsible for qualifying loops.</p> <p>Requirements are documented and made available to CLECs and Qwest personnel. CLEC information is available on the Qwest Web site at http://www.qwest.com/wholesale/ima/gui/document.html, and in the <i>IMA Loop Qualification and Raw Loop Data Job Aid</i>. Loop qualification information for Qwest retail customers is available at: https://orderdsl.qwest.com/order/welcome.asp.</p> <p>KPMG Consulting also observed the loop qualification process in the Qwest retail and wholesale work centers in order to confirm that these activities were accurately and consistently practiced, as defined and documented above.</p>

Test Cross-Reference	Evaluation Criteria	Result	Comments
12.7-1-2	The loop qualification query process is consistent for retail and wholesale customers.	Satisfied	<p>The loop qualification query process is consistent for retail and wholesale customers.</p> <p>Qwest retail customers can determine whether they qualify for DSL service through one of the following means:</p> <ul style="list-style-type: none"> • Telephone inquiry • Qwest Web site query • Email or fax inquiry. <p>Qwest wholesale customers use various loop qualification tools, via IMA, to obtain comparable information for their end-user customers. Wholesale customers can also obtain loop qualification information from Qwest's ISCs via the same means listed above.</p> <p>Qwest retail processes are documented on the retail Web site at https://orderdslqwest.com/order/welcome.asp. Qwest wholesale processes are documented on the wholesale Web site at http://www.qwest.com/wholesale/ima/gui/document.html. Qwest wholesale SDCs have access to additional process documentation via InfoBuddy, a Qwest internal, online job aid.</p> <p>KPMG Consulting observed and confirmed that these loop qualification process activities were accurately and consistently practiced, as defined and documented above.</p>
12.7-1-3	Process and procedures are defined for addressing errors regarding loop qualifications in the retail and wholesale environments.	Satisfied	<p>Process and procedures are defined for addressing errors regarding loop qualifications in the retail and wholesale environments. Processes and procedures are defined to address errors as outlined in Qwest's document, <i>MCC - Example of rejection after FOC is sent</i>.</p> <p>Retail and wholesale customers have the same options to resolve a situation in which a loop qualification query results in a "not determined" response. Wholesale customers also have access to loop makeup data that can be used to confirm loop qualification results.</p> <p>KPMG Consulting observations of representatives in the Qwest retail and wholesale work centers confirmed that these activities were accurately and consistently practiced, as defined and documented</p>

Test Cross-Reference	Evaluation Criteria	Result	Comments
12.7-1-4	The internal process flow used for loop qualification is consistent for retail and wholesale customers.	Satisfied	<p>above.</p> <p>Qwest's internal process flow used for loop qualification is consistent for retail and wholesale customers.</p> <p>During interviews with CLEC SMEs, KPMG Consulting confirmed that the internal process flow used for wholesale loop qualifications is consistent with defined and documented Qwest processes.</p> <p>Requirements are documented and made available to CLECs and Qwest personnel. CLEC information is available on the Qwest Web site at https://orderdsl.qwest.com/order/welcome.asp, and in Qwest's document, <i>IMA Loop Qualification and Raw Loop Data CLEC Job Aid</i>.</p> <p>During initial testing, KPMG Consulting identified apparent discrepancies with Qwest's back-end systems that provide loop qualification results. KPMG Consulting issued Exception 3038.</p> <p>After completing additional interviews and document analysis, KPMG Consulting determined that internal process flows are consistent for both retail and wholesale operations, and that back-end systems provide consistent results for both wholesale and retail queries.</p> <p>See Exception 3038 for additional information on this issue. Exception 3038 is closed.</p>
12.7-1-5	Qwest contact information is readily available for retail and wholesale customers.	Satisfied	<p>Qwest contact information is readily available for retail and wholesale customers.</p> <p>Interviews with CLEC SMEs verified that Qwest contact information is available on Qwest's Web site, and in documentation provided to CLECs by Qwest account managers. KPMG Consulting confirmed the availability of contact information with SMEs at CLECs.</p> <p>Documentation that describes the various Qwest departments and related SMEs is available to CLECs at https://www.qwest.com/wholesale/, and in the Qwest document, <i>Frequently Called Numbers – ISC – Wholesale</i>.</p> <p>KPMG Consulting verified the availability of this contact information during</p>

Test Cross-Reference	Evaluation Criteria	Result	Comments
			<p>observations at both the Qwest wholesale and retail work centers. KPMG Consulting also observed SDCs providing contact information to end-users and CLECs.</p>
12.7-1-6	<p>The customer receives confirmation of the completion of a loop qualification, or can access the status of loop qualifications.</p>	Satisfied	<p>The customer receives confirmation of the completion of a loop qualification, or can access the status of loop qualifications. CLECs and retail end-users receive completion confirmations via the same vehicle through which they query. That is, if submitted in IMA, the customer will receive confirmation via IMA.</p> <p>During observations with CLEC SMEs who are responsible for receiving confirmation of loop qualification query completion, KPMG Consulting observed receipt of such confirmations.</p> <p>KPMG Consulting also observed receipt of loop qualification confirmations in the Qwest retail and wholesale work centers, to confirm that these activities were accurately and consistently practiced.</p>
12.7-1-7	<p>Systems and processes are in place to allow wholesale and retail loop qualification queries to be performed using the customer address.</p>	Satisfied	<p>Systems and processes are in place to allow wholesale and retail loop qualification queries to be performed using the customer address.</p> <p>The database(s) used to qualify loops is the same for both the wholesale and retail organizations. PREMIS is the primary system for identifying loops at a given address.</p> <p>The databases are updated with the same frequency, and at the same intervals, for both the wholesale and retail organizations.</p> <p>KPMG Consulting observed the qualification of customer addresses in the Qwest retail and wholesale work centers, and confirmed that these activities were accurately and consistently practiced, as defined and documented above.⁵</p>

⁵ During the execution of Test 12, Evaluation of POP Functionality and Performance versus Parity and Standards and Benchmarks, Hewlett-Packard Consulting (HPC) identified an issue with Raw Loop Data Query pre-order functionality; see HPC's Exception 2063 for additional information. The specific discrepancy identified in E2063 is not addressed in the Test 12.7 Test Report because the issue in question has no comparable Retail equivalent. The issue in question is scheduled to be resolved after the IMA version 9.0 implementation, which is planned for February 2002.

Test Cross-Reference	Evaluation Criteria	Result	Comments
12.7-1-8	Loop qualification response types that are provided are consistent between retail and wholesale customers.	Satisfied	<p>Loop qualification response types that are provided are consistent between retail and wholesale customers.</p> <p>Loop qualification queries, by both retail and wholesale customers, result in one of the following response types:</p> <ul style="list-style-type: none"> • Yes • No • Not Determined <p>Interviews with both CLEC SMEs and Qwest representatives verified that loop qualification response types that are provided are consistent between retail and wholesale customers.</p> <p>KPMG Consulting observations at Qwest retail and wholesale centers verified that personnel receive the same qualification response types. Identical query types for loop qualification resulted in the same response types.</p>
12.7-1-9	The escalation process for loop qualifications is consistent for retail and wholesale customers.	Satisfied	<p>The escalation process for loop qualifications is consistent for retail and wholesale customers.</p> <p>For loop qualification queries for which the qualification tools return a "not determined" response, wholesale and retail customers can submit a further request to make a determination as to whether or not the specified loop qualifies. The standard interval for these inquiries is 10 business days.</p> <p>The escalation process is documented and made available to CLECs and Qwest personnel. CLEC information is available on the Qwest Web site at http://www.qwest.com/wholesale/clecs/exesclover.html.</p> <p>Additional escalation process descriptive information is available in the Qwest documents, <i>Escalation Management Process for Design Services Bulletin Number: PB97028-5</i> and <i>Service Delivery Escalation/Status Process</i>.</p> <p>KPMG Consulting interviews with CLEC SMEs who are responsible for escalating orders confirmed that the Qwest escalation process, as defined and documented, is consistently practiced. At visits to Qwest work centers, KPMG Consulting also</p>

Test Cross-Reference	Evaluation Criteria	Result	Comments
			observed direct use of the escalation process.
12.7-1-10	The capacity management process for loop qualification is consistent for retail and wholesale customers.	Satisfied	<p>Qwest's capacity management process for loop qualification is equivalent for retail and wholesale customers.</p> <p>Qwest's process for loop qualification capacity management is encompassed within its overall work center capacity management process.</p> <p>Qwest work center order volume is tracked, and is used to forecast future work volumes. Qwest uses this information to schedule resources for the retail and wholesale centers.</p> <p>Load and Resource Managers (LRM) are responsible for managing and monitoring order and/or call volumes, staffing levels, product trends, and capacity utilization. LRMs regularly compile various reports: actual vs. projected volumes, in today/out today, and Automatic Call Distributor (ACD) logs.</p> <p>Qwest's capacity management procedures are documented and made available to CLECs and Qwest personnel. CLEC information is available on the Qwest Web site at http://www.qwest.com/wholesale/guides/forecasting.html.</p>