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BEFORE THE 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 ("Qwest"), through its undersigned counsel, submits this brief regarding its Change Management Process ("CMP"). As set forth below, Qwest's CMP satisfies the factors considered by the Federal Communications Commission ("FCC") in evaluating Checklist Item 2 compliance, as it relates to change management processes.

I. INTRODUCTION

After more than nine months of extensive collaboration, Qwest and the CLEC community have reached agreement on all material aspects of Qwest's CMP. Qwest and the CLECs reached impasse on a single issue, which, as discussed below, has been resolved.

Qwest's CMP, as implemented pursuant to the agreements reached in the CMP redesign meetings, clearly meets the standards set by the FCC for change management. Qwest's redesigned CMP provides CLECs more opportunity for input, participation, and control than any other ILEC's change management process, including the ability to prioritize Qwest-originated systems change requests. Further, the scope of Qwest's CMP is broader

than that of 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. Thus, for example, Qwest has implemented a process that allows CLECs to prioritize Qwest-originated changes. As a result, CLECs have already prioritized Qwest-originated change requests for two IMA-EDI releases.

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.¹ Qwest's change management procedures will be incorporated into its SGAT (Section 12.2.6 and Exhibit G).

II. THE CMP REDESIGN PROCESS HAS PRODUCED A COMPREHENSIVE, COLLABORATIVE CHANGE MANAGEMENT PROCESS.

A. The CMP Redesign Process.

In July 2001, Qwest and CLEC representatives began meeting in a collaborative effort with the CLEC community to redesign its change management procedures.² CLEC and Qwest representatives have met for more than 37 days over the past nine months to discuss every aspect of Qwest's CMP. CLECs and Qwest have made every effort to achieve

¹ *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.

² Qwest has established a web site where it has posted the redesign meeting minutes and other materials. The web site address is <http://www.qwest.com/wholesale/cmp/redesign.html>.

consensus. Indeed, no party has been precluded from raising any issue during the redesign process. As a result of this extensive collaboration, Qwest and the CLEC community have reached agreement on all substantive aspects of Qwest's CMP. These agreements are reflected in the Qwest Wholesale Change Management Process Document ("Wholesale CMP").³

Although the FCC has only required that change management procedures be implemented for changes to OSS interfaces, Qwest has agreed to include changes to products and processes in its redesigned CMP, as well. The redesign negotiation process is complete with respect to all substantive issues. Qwest and the CLECs have worked out processes for all aspects of the CMP, including discussing and revising the OBF language, and the agreed-upon processes have been implemented. The end result is a complete change management process, with only a single issue that reached impasse.⁴

The CLEC/Qwest redesign team agreed to begin with OBF Issue 2233, version a1v1, as a starting point for negotiating the redesigned CMP.⁵ To date, virtually all of the OBF document has been discussed and base-lined, as reflected in the Wholesale CMP.

Once the redesign team reached agreement, Qwest implemented the agreement as soon as practicable. During the redesign meetings, Qwest and CLECs agreed to a process for Qwest's implementation of redesign agreements that included Qwest's presentation of the

³ The Qwest Wholesale Change Management Process Document is attached as Exhibit A. This document is also posted on Qwest's wholesale web site at the following address: <http://www.qwest.com/wholesale/cmp/whaticmp.html>

⁴ The impasse issue was whether OBF language that treats changes to meet performance measurements as regulatory changes should be included in the Qwest CMP definition of Regulatory Changes. This issue has no impact on Qwest's compliance with the requirements of Section 271. As discussed below, the Colorado Commission has ruled on this issue. Qwest and the CLECs have agreed that the resolution will apply in all Qwest states.

⁵ OBF Issue 2233 refers to a forum for industry-wide deliberations on development of national guidelines pertaining to change management.

agreements to the broader CLEC community at the monthly CMP meeting prior to implementation. From the time that process was agreed to, Qwest has first presented agreements reached through the redesign effort to the CLEC community at the monthly meetings prior to implementing them. The redesign team has agreed that, upon completion of the redesign process, the parties will have the opportunity to revisit any part of the redesigned plan in light of the whole. Through the redesign process, the team discussed and closed all of the issues that were raised in the checklist item workshops.⁶

The redesign process is only one stage in the evolution of Qwest's Wholesale CMP. While Qwest is committed to abide by the agreed upon redesigned CMP, the CMP remains open to additional modifications to the CMP over time.⁷ The FCC has recognized that the change management process is evolutionary by definition:

We do not expect any change management plan to remain static. Rather, a key component of an effective change management process is the existence of a forum in which both competing carriers and the BOC can work collaboratively to improve the method by which changes to the BOC's OSS are implemented.⁸

Qwest remains committed to continuing to hold redesign sessions after it receives section 271 approval and as long as necessary to resolve any remaining issues.

⁶ Those issues were previously referred to in briefs and status reports as the Colorado Issues Log, COIL, and "CM" issues.

⁷ Wholesale CMP § 1.0.

⁸ *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*

B. The CMP Redesign Team Identified and Discussed All Issues of Significance to CLECs.

At the March 5-7, 2002 redesign meeting, Qwest and the CLEC community agreed upon an approach for identifying and resolving the remainder of the significant CMP issues. The approach was designed to allow the parties to identify the most important issues and to then reach agreement in principle or impasse on those issues by April 4, 2002.⁹

The process the parties agreed to employ to identify and resolve the important issues allowed CLECs to raise any and all issues they believe are significant. The parties began with the list of the List of Priority CMP Issues submitted by AT&T. The parties assigned each of the AT&T issues to one of three categories, as follows: Category 1 denotes issues that required more discussion and may become an impasse issue; Category 0 denotes issues that required some discussion and most likely would not reach impasse; and Category X denotes issues that required no further discussion. Using this process, the parties determined that there were twelve Category 1 issues, ten Category 0 issues, and two Category X issues.¹⁰ Both Covad and WorldCom concurred with the issues that were identified by AT&T. Covad raised one additional issue, relating the addition of a provision in the CMP to allow for exceptions to the standard process, which Covad described as a "non-controversial" issue.

The parties agreed to first discuss the twelve issues in Category 1, which were relatively more important and might reach impasse. These issues were then prioritized. Each party ranked the issues in order of importance, and the rankings for each issue were averaged.

Services In Texas, CC Docket No. 00-65, Memorandum and Opinion Order, FCC 00-238 (rel. June 30, 2000) ("*Texas 271 Order*"), at ¶ 117.

⁹ The redesign team will continue holding the redesign sessions after April 4, 2002 to allow the parties to craft detailed provisions to describe their agreements and to address any other unresolved issues.

This process produced a list of the twelve issues ranked in descending order of importance. To efficiently identify any impasse issues, the parties agreed to attempt to reach agreement in principle regarding each issue and to defer crafting detailed language until all of the Category 1 issues had been discussed.

The redesign team was very successful in using this approach. All of the Category 1 and 0 issues were discussed and no impasse issues were identified. The parties reached agreement in principle regarding all twelve of the twelve Category 1 issues, including such significant issues as the process for Qwest-originated product and process changes, criteria for Qwest's denial of change requests ("CRs"), and a method for CLECs to postpone Qwest's implementation of a product or process change. The parties also reached agreement in principle regarding eight of the ten less significant Category 0 issues. Though two category 0 issues remain open for further discussion, the parties agreed that those issues will not result in impasse.

Thus, the redesign team successfully identified, discussed, and reached agreement in principle on virtually all of the issues that the CLECs identified as the most important. The parties also made substantial progress in agreeing to language that memorializes many of those agreements in principle. Most importantly, the redesign team agreed that none of the issues discussed will result in impasse.

III. QWEST'S CMP IS MORE COMPREHENSIVE THAN ANY OTHER ILEC'S PROCESS.

The parties have now reached agreement on virtually all CMP issues, except the single impasse identified in Qwest's February 8, 2002 filing. These agreements are set forth in the Wholesale CMP. The impasse issue related to whether the OBF language that provided that

¹⁰ The prioritized Category 1 issues and the Category 0 issues are set forth in Exhibit B.

changes required to meet performance measurements should be included in the Regulatory Change definition should be incorporated in Qwest's CMP. The Colorado Commission issued an oral ruling that the OBF language should not be included. Qwest and the CLECs have agreed that this resolution will apply in all states, thus eliminating this impasse issue.

Qwest's redesigned CMP provides CLECs more opportunity for input, participation, and control than the change management processes implemented by Verizon, SBC, or 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. Qwest's Wholesale CMP, pursuant to which Qwest now operates, is described below.

Scope (Section 1). The Introduction and Scope section of Qwest's CMP includes changes products and processes 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.¹¹

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.¹²

As mentioned above, the FCC has not required any ILEC to have a change management process for product or 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

¹¹ Wholesale CMP, Section 1.0.

271, Qwest has implemented just such a process. Moreover, Qwest used the same collaborative process it used to redesign the systems provisions of its CMP to revise the product and process provisions of that process. Indeed, the parties have agreed to the processes by which CLECs and Qwest submit changes for product and process issues.¹³

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

Administrative Matters, Meetings, Web Site (Sections 2 and 3). 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 and process issues. The Wholesale CMP 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 CRs, 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 and process change management meetings; and (3) provides a link to OSS documentation and a list of releases notifications relating to that documentation. The web site features enhanced search capabilities to assist CLECs in finding and using

¹² 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.

¹³ See Wholesale CMP, Section 5.3 and Interim Qwest-Initiated Product/Process Change Process (Exhibit C).

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.

Types of Change (Section 4). 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. Qwest has also agreed that Regulatory Changes and Industry Guideline Changes will be prioritized as long as Qwest is permitted to meet mandated implementation dates for Regulatory Changes and recommended implementation dates for Industry Guideline Changes. Qwest's CMP provides CLECs more input into the treatment of Regulatory Changes than the change management processes of any other ILEC.

Qwest has agreed that CLECs may submit Regulatory and Industry Guideline CRs and that the same processes will apply regardless of the originator (Qwest or CLEC). 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 have agreed that Regulatory Changes will be implemented by mechanization unless the parties agree that an exception to that general rule applies.

Change Request Process (Section 5). The OSS interface CR initiation process provides that Qwest and CLECs both submit CRs to request changes to OSS interfaces. Both

Qwest-originated and CLEC-originated OSS interface CRs follow the same 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.

The process for CLEC-initiated product and process changes is very similar to the OSS interface CR process. The process for Qwest-initiated product and process changes was the subject of much discussion during redesign meetings. The parties agreed to a detailed Interim Qwest-Initiated Product/Process Change Process.¹⁴ This process contains four tiers of processes, called "levels," differentiated by the expected impact of changes on CLECs. Each level includes a list of the categories of changes to which the processes for that level apply. As the introductory note in that document states, the parties agreed that Qwest would implement the interim process. Qwest implemented the process on April 1, 2002. At the same time, the CMP redesign team is working to refine the categories of changes to which each process level applies. Qwest and the CLECs expect that this effort will be completed by April 16, 2002, after which CLECs and Qwest will baseline the process, and it will be added to the Wholesale CMP.

The interim process classifies Qwest-initiated changes into four groups, labeled Levels 1-4. Level 1 is defined as "changes that do not alter CLEC operating procedures or are time critical corrections," and includes changes such as verbiage clarifications and corrections that do not change the initial purpose of a document. Level 2 is defined as "changes that have minimal effect on CLEC operating procedures," and includes changes such as email address,

¹⁴ This process is attached as Exhibit C and is also posted at the following URL: <http://www.qwest.com/wholesale/cmp/whatiscmp.html>

telephone number, and fax number changes. Level 3 is defined as "changes that have moderate effect on CLEC operating procedures and require more lead-time before implementation than Level 2 changes," and includes changes such as product enhancements that do not drive new processes and customer-facing center hour changes. Level 4 changes are defined as "changes that have major effect on existing CLEC operating procedures or that require the development of new procedures," and include changes such as interval changes and new processes related to product enhancements.

Each level defines a different process for changes falling within that level. For Level 1 changes, Qwest provides a notification to CLECs showing the text change by highlighting the language and a history log tracking the change; there is no comment cycle for such changes. For Level 2 changes, Qwest provides a notification to CLECs describing the change at least 21 calendar days in advance of the change. There is also a comment cycle, which provides for CLECs to submit comments and Qwest to reply to those comments prior to implementation of the change. For Level 3 changes, Qwest provides a notification to CLECs describing the change at least 31 calendar days in advance of the change. There is also a comment cycle, which provides for CLECs to submit comments and Qwest to reply to those comments prior to implementation of the change. Qwest will implement Level 3 changes no sooner than 15 calendar days after providing its response to CLEC comments. Thus, the implementation date for Level 3 changes is 31 to 45 days from the initial notification, depending upon when Qwest responds to CLEC comments.

Level 4 changes, which have the most impact on CLECs, require Qwest to submit a CR describing the proposed change. The CR is then presented at the monthly product/process CMP meeting for discussion with CLECs. Together, CLECs and Qwest will develop a

process for Qwest to obtain CLEC input regarding the proposed change, which may include conferences or written comment cycles. After obtaining CLEC input in accordance with the process agreed at the monthly product/process CMP meeting, Qwest will modify the CR, if necessary, and design a solution. Qwest will then provide notification to CLECs of the planned change at least 31 calendar days prior to implementation. It is important to note that this notification is not issued until after Qwest and CLECs have discussed Qwest's CR, CLECs have provided input pursuant to the agreed process, and the CR is modified, if necessary. At this point, the process provides for a comments cycle similar to that for Level 3 changes, which results in an implementation date of 31-45 days from the date of the notification.

For Levels 2 through 4, where Qwest provides responses to CLEC comments, any CLEC that does not accept Qwest's response may elect to escalate the issue or pursue dispute resolution in accordance with the CMP escalation and dispute resolution provisions.

The description for each of the Levels 1-4 sets forth a list of the categories of changes that fall under that level. If a particular category of change is not listed under Level 1 or Level 2, Qwest will issue a Level 3 notification. As described below, Level 3 notifications provide for a comment cycle and 31 to 45 calendar days of notice prior to implementation of the change. Qwest and CLECs will discuss any requests to change the level under which a noticed change falls or to establish new change categories under Levels 1 through 4 at the monthly CMP meeting. If the parties do not reach agreement regarding such a request, the issue will be determined by a majority vote.

The redesign team has already made substantial progress in refining the categories of changes to which each level of process applies. In fact, the team agreed to add a new level, to

be labeled "Level 0." This level addresses the CLECs' desire to allow Qwest to make ministerial changes to documentation without providing any notification or tracking such minor changes in a history log. As noted above, Qwest and the CLECs expect that the refining effort will be completed by April 16, 2002.

OSS Interface Release Calendar (Section 6). Qwest will provide a rolling 12 month OSS interface release calendar on a quarterly basis showing release schedules for all OSS interfaces within the scope of CMP for the next twelve months. The schedule will include such information as the deadlines for CR submission, issuance of draft and final release notes, issuance of draft and final technical specifications, comment cycle timelines, testing period, and planned implementation dates. The release calendar is posted on the CMP web site.¹⁵

Changes to Existing OSS Interfaces (Section 8). 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

¹⁵ The release calendar can be found at the following URL:
<http://www.qwest.com/wholesale/cmp/osscalendar.html>

with Qwest prior to the implementation date. In addition, Qwest provides a rolling twelve month summary of its OSS interface development schedule.

Finally, Qwest employs versioning for its IMA-EDI interface, meaning that it maintains a prior version of a software release for some time after implementing a new version.¹⁶ Versioning provides flexibility to CLECs in determining when to implement the new version by allowing CLECs to use the older version for as long as they choose during the six-month period.

Introduction and Retirement of OSS Interfaces (Sections 7 and 9). 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.

Prioritization of Systems CRs (Section 10). Like other ILECs' change management processes, Qwest's CMP allows CLECs to prioritize both Qwest-originated and CLEC-originated CRs. This agreement has been implemented and CLECs have already prioritized Qwest-originated CRs along with CLEC-originated CRs for the 10.0 and 11.0 IMA releases.

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

¹⁶ See *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*"), ¶ 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

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. By allowing CLECs to prioritize all types of changes, Qwest's process allows CLECs to influence changes that impact them and how they do business with Qwest, while still allowing Qwest to implement changes within specified compliance timeframes.

The parties also agreed in principle to a special change request process that provides a method by which a CLEC or Qwest can move a CR into a release even though it would not otherwise be included in the release. This process will allow a CLEC or Qwest to separately fund the development and implementation of changes that are very important to the initiator, but that would not otherwise be made, e.g., a change that is not prioritized high enough to be included in a release.

Application-to-Application Interface Testing (Section 11). 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 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

system changes and enhancements do not adversely affect a carrier's ability to access the BOC's OSS""(quoting *Texas 271 Order*, 15 FCC Rcd at 18408, ¶ 115).

specifications of the latest release from the previous version before moving from one version to the next version.

Production Support (Section 12). 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 14 and 15). 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 CR; 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.

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

In evaluating ILEC 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 ILEC makes available for the purpose of building an electronic gateway.¹⁷

The FCC has also examined whether an ILEC 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 ILEC's OSS.¹⁸ The adequacy of Qwest's stand-alone test environment ("SATE") and the documentation and technical assistance it provides to CLECs for the purpose of building electronic gateways are being addressed as a part of OSS testing and are not addressed here. However, the parties agreed to certain provisions relating to application-to-application interface testing, including SATE. Those provisions are described below.

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 -- the Wholesale CMP document -- that was the subject of extensive discussion, comment, and revision through collaboration between Qwest and the CLECs.

Qwest provides easily accessible and well-organized information regarding its change management process. Qwest maintains a web site that sets forth the current change

¹⁷ *Arkansas/Missouri 271 Order*, Appendix D, at ¶ 42, citing *Bell Atlantic New York Order*, 15 FCC Rcd at 4002-004 (footnotes omitted).

management process, including the method for proposing and processing CLEC-originated and Qwest-originated OSS interface CRs and product and process changes.¹⁹ Those procedures are set forth in the Wholesale CMP, which, as noted above, can be found in an updated form on the Qwest wholesale web site.²⁰ As discussed above, this document contains agreements reached through extensive negotiations between the CLEC community and Qwest regarding the redesign of Qwest's change management process. Other documents containing change management procedures are also included on the web site, such as the interim procedures on Qwest-initiated products and process changes, discussed above. Through the redesign process, CLECs have had substantial input into the organization and clarification of change management related materials on the web site.

The web site also serves as a repository of information that is useful to CLECs participating in CMP. For example, CRs that will be presented to the CLEC community for discussion and refinement at monthly CMP meetings are posted on the web site. Both CLEC-originated and Qwest-originated CRs are posted to the web site. The change management web site includes a link to a form that allows CLECs and Qwest to submit CRs electronically.²¹ Qwest updates and maintains a database that tracks the progress of each CR, reports changes systematically using CR numbers, and uses these same numbers in communications with CLECs to identify specific changes.

¹⁸ *Arkansas/Missouri 271 Order*, Appendix D, at 40; see *Massachusetts 271 Order*, at ¶ 103, citing *Texas 271 Order*, 15 FCC Rcd at 18404, ¶ 108.

¹⁹ The Qwest change management web site can be found at the following URL: <http://www.qwest.com/wholesale/cmp/index.html>.

²⁰ See Wholesale CMP, which can be found at the following URL: <http://www.qwest.com/wholesale/cmp/whatiscmp.html>

²¹ See Product/Process and Systems links listed under "Change Requests" link at the following URL: <http://www.qwest.com/wholesale/cmp/index.html>.

The Qwest wholesale web site also includes other information about the change management process, the redesign process, pending CRs, and change management issues. For example, the web site (1) contains a listing of the CRs, 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; (3) provides a link to OSS documentation and a list of releases notifications that are related to that documentation; and (4) provides a link to the SATE Data Documents which contain SATE test case scenarios.²² It also includes the minutes from CMP meetings, past and future meeting schedules, the Release Calendar, release notifications, CRs, CMP contact information, information about how to make a CR, and much more useful information.

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

CLECs have had -- and will continue to have -- substantial opportunities for meaningful input into the design and operation of Qwest's change management process.

Qwest and the CLECs have met regularly, for more than 37 days since July 2001, to collaboratively redesign Qwest's change management procedures. The redesign effort has provided an opportunity for CLECs and Qwest jointly to redesign the CMP by expanding its scope, developing and documenting more detailed processes, improving notification intervals, and establishing meeting standards.

The redesign process operates on a parallel track with Qwest's ongoing change management forum. The schedules, agendas, and minutes of the CMP and CMP redesign

²² The CMP web site has links to the IMA-EDI page that specifies for CLECs how to use the EDI environment.

meetings are posted on the Qwest CMP web site. Qwest has regularly filed status reports on the progress of the redesign process beginning in October 2001. A number of CLECs have filed comments on the status reports, and Qwest and CLECs have participated in workshops regarding CMP related issues during the redesign process.

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.²³ The parties understand that the CMP is a dynamic process that will be subject to ongoing improvements. Now and in the future, procedures are in place to ensure that CLECs will have substantial input into the design and operation of the CMP.

CLECs also have substantial opportunities for input into the continued operation of the change management process. As discussed above, Qwest and CLECs jointly participate in the CMP forum for managing changes related to Qwest's OSS interfaces, products, and processes that support the five categories of OSS functions (pre-ordering, ordering, provisioning, maintenance and repair, and billing). The CLECs and Qwest jointly developed key elements of the monthly CMP meeting during the redesign process. These include: 1) the frequency and duration of the meeting, 2) the purpose of the meeting, 3) meeting protocol, 4) the content and distribution of meeting materials, 5) non-standard and "walk-on" agenda items, 6) the content and distribution of meeting minutes, and 7) provisions for ad hoc CMP meetings.

Qwest's current change management process, which is comprised of processes that were implemented as a result of the CLEC-Qwest CMP redesign effort, provides opportunities for CLEC input throughout the lifecycle of a CLEC- or Qwest-initiated CR. For example, the process expressly provides for CLEC input regarding CLEC or Qwest initiated CRs at

²³ Wholesale CMP, Section 1.0.

clarification meetings and/or at monthly CMP meetings. CLEC input regarding Qwest's proposed solutions and draft responses is solicited at monthly CMP meetings. Additionally, for those changes that result in Product Catalog (PCAT) or technical publication (TechPub) changes, CLECs have the opportunity to provide written comments concerning the proposed changes via a web-based customer comment tool.

The prioritization process also provides a significant opportunity for the CLECs to have input to and control over which OSS interface changes are implemented and in which release they are implemented. Additionally, Qwest's change management processes for the introduction and retirement of OSS interfaces and changes to existing OSS interfaces provide for CLEC input throughout the development lifecycle. For example, the process for changes to an existing application-to-application OSS interface provides three distinct opportunities for CLEC input. First, CLECs may submit written questions and comments on the draft technical specifications. Second, Qwest hosts a "walk-through" which affords the opportunity for Qwest and CLEC technical subject matter experts to discuss the upcoming changes. CLECs are encouraged to invite their technical experts, systems architects, and designers, to attend the walk through. Third, following the walk-through, the CLECs have an opportunity to submit written comments and questions to Qwest.²⁴

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

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

²⁴ Wholesale CMP, Section 8.1. As discussed above, Qwest also employs versioning for its IMA interface, meaning that it maintains a prior version of a software release for six months after implementing a new version, so that CLECs need not switch to the newer version immediately. See *Massachusetts 271 Order*, ¶ 107.

One factor the FCC examines in its 271 evaluation is an ILEC's procedures for escalation and resolution of disputes between the CLEC and the ILEC regarding OSS issues. Qwest has implemented the escalation and dispute resolution procedures the parties agreed upon through the redesign process. The procedures are set forth in the Wholesale CMP.²⁵ As of April 8, 2002, the escalation procedures have been invoked on one occasion with regard to systems changes, and on four occasions with regard to product and process changes. The dispute resolution procedures have not yet been invoked as of April 8, 2002.

The change management escalation and dispute resolution procedures were developed jointly by Qwest and the CLECs in the redesign process. The escalation procedures apply to all issues that are within the scope of the CMP, including issues surrounding the CMP itself and its administration.²⁶ The escalation procedures contain specific instructions for communicating the escalated issue to Qwest, including a statement of the CLEC's desired resolution and a request for interim action, if applicable. 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 within seven days for a disputed CR and within 14 days for other escalations. Escalation requests and Qwest and CLEC responses are posted to the web site.

A CLEC or Qwest may bypass the escalation process and immediately invoke the dispute resolution process. Like the escalation process, the CMP contains specific requirements for describing and documenting the dispute. If the parties agree, the dispute can

²⁵ Wholesale CMP, Sections 14 and 15.

be resolved externally through an alternative dispute resolution process; alternatively, a CLEC or Qwest may submit the issue to an appropriate regulatory agency.

Qwest and the CLECs have also agreed to procedures for impasse resolution that apply to the redesign effort. These impasse resolution procedures require CLECs and Qwest to negotiate in good faith and to make every attempt to reach consensus (both among the CLECs and between the CLECs and Qwest). As of April 8, 2002, only one issue has reached an impasse in the redesign process, as the parties have been successful in negotiating solutions in the framework of the redesign sessions. Further, as discussed above, the CLECs have already identified, discussed, and resolved the most important and most contentious issues for the express purpose of determining whether any additional impasse issues are likely. No impasse issues were identified; indeed, the parties reached agreement in principle on all of the most contentious issues.

Nonetheless, in the unlikely event that an issue reaches impasse, the following dispute resolution options are available: (1) Qwest will identify the impasse issues in its monthly CMP redesign status reports to the state commissions, and the issues can be treated as impasse issues in the Section 271 proceedings in those states; or (2) if a commission no longer accepts impasse issues in a 271 proceeding, Qwest or any CLEC may submit the issue following the procedures of the appropriate regulatory agency. Finally, if the parties agree, a third party may be hired to resolve the dispute.

In sum, if Qwest and the CLECs cannot reach agreement, either in the redesign process or in the change management forum itself, the escalation and dispute resolution procedures agreed to by the parties are used to resolve issues and produce a solution that

²⁶ Wholesale CMP, Section 1.

Qwest and CLECs will accept and implement. Thus, even though the parties have already identified and resolved the most contentious issues, the procedures already in place ensure that the redesign process will conclude successfully and with a collaborative result, rather than one dictated by Qwest.

D. Qwest Provides a Stable Testing Environment

Through the redesign process, the parties agreed to procedures that govern Qwest's Customer Test Environment ("CTE"). The CTE offers a CLEC several ways in which to test its transaction-based application-to-application interfaces for pre-order, order and maintenance and repair functionality with Qwest's OSS. As set forth in the Wholesale CMP,²⁷ Qwest offers the following testing options for pre-ordering and ordering:

- Stand Alone Test Environment (SATE)²⁸
- Progression Testing in the Interoperability Environment
- Controlled Production

For maintenance and repair, the Qwest customer test environment currently includes CMIP Interface Test Environment (MEDIACC).

The CMP states that Qwest will provide the CTE for each major release and will update each CTE for any point release that has changes that were disclosed but not implemented as part of the major release. Qwest provides initial implementation testing²⁹ and

²⁷ Wholesale CMP, Section 12.0.

²⁸ As mentioned above, Qwest's SATE is being addressed through OSS testing. SATE's adequacy is not addressed here.

²⁹ Initial implementation testing is intended for those CLECs that are not currently in production or that want to test new ordering or pre-ordering transactions for which they have not been through testing.

migration testing³⁰ for all types of OSS interface change requests, controlled production for pre-ordering and ordering, and an opportunity for regression testing of the OSS interface functionality.

Qwest notifies CLECs of testing schedules so that CLECs may determine whether to participate in a test. CLECs that desire to test with Qwest must participate in at least one joint planning session to prepare for testing. If the CLEC uses the same software components and similar connectivity configuration as it uses in production, the Wholesale CMP provides that response times in testing generally should be similar to production.³¹ It also provides that Qwest will make available a 30-day test window for any CLEC who desires to jointly test with Qwest prior to the release production date for a major release.³²

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

Qwest has demonstrated a pattern of compliance with the change management process. As an initial matter, Qwest has complied with the agreed-upon scope of the CMP. As of April 8, 2002, Qwest only rejected one CR on the grounds that it was not within the scope of the CMP.

In processing CRs, Qwest has met its obligations with regard to the following agreed-upon process milestones: 1) sending acknowledgements to the CR originator; 2) posting CRs to Qwest's CMP web site; 3) contacting customers to schedule clarification meetings; 4) conducting meetings to clarify CLEC CRs; 5) providing initial responses to CLEC CRs; 6)

³⁰ Migration testing refers to testing from one version of an interface to the next version.

³¹ Wholesale CMP § 11.0. The CMP redesign document also notes that the CTE is not intended for volume testing. *Id.*

³² Wholesale CMP § 8.1.8.

posting initial responses to Qwest's CMP web site; 7) presenting CRs; 8) providing final responses to CLEC CRs (if applicable); and 9) posting final responses to Qwest's CMP web site (if applicable.) Between November 1, 2001 and February 2002, Qwest processed 58 new OSS interface CRs. Of a possible 347 milestones, Qwest was responsible for missing two milestones. This equates to a 99.42% compliance rate with the CLEC/Qwest Initiated OSS Interface CR Process. During this same time, Qwest processed 32 new CLEC initiated product and process CRs. Of a possible 126 milestones, Qwest was responsible for missing seven milestones. This equates to a 94.44% compliance rate with the CLEC Initiated Product/Process CR Process. Significantly, the compliance rate for this process in January and February 2002 was 100%.

Qwest also has met its obligations to: 1) track and document the status of CRs; 2) to hold regular CMP meetings; 3) to provide meeting materials in advance of the meetings; and 4) to record meeting discussion, action items, and issues. This information may be found at Qwest's CMP web site.³³

In processing escalations, Qwest has met its obligations with regard to the following agreed-upon process milestones: 1) acknowledging receipt of escalation; 2) posting escalation on Qwest's CMP web site; 3) issuing notice to CLECs; and 4) providing Qwest's binding response. As of February 2002, Qwest processed one OSS interface escalation and four product and process escalations. Of a possible 16 milestones, Qwest was responsible for missing one milestone. This equates to a 93.75% compliance rate with the escalation process.

³³ The information can be found at the following URLs:
<http://www.qwest.com/wholesale/cmp/changerequest.html> and
<http://www.qwest.com/wholesale/cmp/teammeetings.html>.

Qwest also met its obligations regarding the development and implementation of a web-based tool for escalation requests.

Qwest made a commitment to highlight all changes published in the PCAT and to redline all changes published in TechPubs beginning January 2, 2002. Since then, Qwest has published at least 102 PCAT and ten TechPub changes. All of these documents contained the agreed-upon highlighting or redlining, web notification forms, history logs, and customer notification forms.

Qwest has demonstrated compliance with the prioritization process. In August 2001, and again in October/November 2001, CLECs and Qwest jointly prioritized CLEC-originated CRs and Qwest-originated CRs for the IMA 10.0 Release. In February 2002, CLECs and Qwest jointly prioritized CLEC-originated CRs, Qwest-originated CRs, and Industry Guideline CRs for the IMA 11.0 Release. At that time, there were only nine outstanding CLEC-initiated IMA CRs.

In addition to demonstrating a pattern of compliance with its change management procedures, Qwest also established a pattern of quickly implementing agreements reached in the redesign process. A matrix showing when Qwest implemented improvements based on agreements reached through the redesign process is attached as Exhibit D.³⁴

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

³⁴ This matrix is also posted on the redesign web site at a link entitled Change Management Process Improvements at the following URL: <http://www.qwest.com/wholesale/cmp/redesign.html>.

have devoted to participating in and providing substantial input to the redesign of Qwest's CMP. Qwest is confident that the collaborative redesign process has produced an effective CMP that meets CLEC needs.

Dated this 8th day of April, 2002.

Respectfully submitted,

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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, 02-20-02, 03-07-02, 04-04-02,
04-08-02

Master Redlined CLEC-Qwest CMP Redesign Framework – CLEAN - History Log

Line #	Version - Filename	Effective Date	Change				Update Activity
			Section #	Section Name	Subsection Name	Update Activity	
1	Master Redlined CLEC-Qwest CMP Re-design Framework - Revised 02-07-02 - CLEAN - Version 1.0	02-07-02	All			Accepted changes to Master Redlines CLEC-Qwest CMP Redesign Framework	
2	Master Redlined CLEC-Qwest CMP Re-design Framework - Revised 02-20-02 - CLEAN - Version 2.0	02-20-02	2.1	Types of Change	Regulatory Change	Added changes to Regulatory Changes section as agreed to at Feb 19 Redesign Meeting.	
3	MasterRedlineCLEAN03070	03-11-02	3.1	Change Request Initiation Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added language agreed to at March 7 Redesign Meeting.	
4			9.0	Prioritization	N/A	Added language agreed to at March 7 Redesign Meeting.	
5			9.3	Prioritization	SCRIP	Added language agreed to at March 7 Redesign Meeting.	
6			5.1.6	Change to Existing Interfaces	Final Interface Technical Specifications	Added language agreed to at March 7 Redesign Meeting.	
7	MasterRedlineCLEAN03270	03-27-02	3.1	Change Request Initiation Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added Reasons for Denial Language	
8	MasterRedlineCLEAN04080	04-08-02	3.3	Change Request Initiation Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added Reasons for Denial Language	
			1.0	Introduction and Scope		Added language agreed to at April 4 Redesign Meeting.	
			2.0	Managing The CMP		Added language agreed to at April 4 Redesign Meeting. Moved Section to 2.0 from 7.0	
			3.0	Meetings		Moved section to 3.0 from 8.0.	
			6.0	OSS Interface Release Calendar		Added language agreed to at April 4 Redesign Meeting.	
			10.0	Prioritization		Moved Appendices to end of document	
			10.2.4	Prioritization	Late Adder	Added language agreed to at April 4 Redesign Meeting.	

**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.

In cases of conflict between the changes implemented through the CMP and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement. In addition, if changes implemented through the CMP do not necessarily present a direct conflict with a CLEC interconnection agreement, but would abridge or expand the rights of a party to such agreement, the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such agreement.

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 2.0.

In cases of conflict between the changes implemented through the CMP and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement. In addition, if changes implemented through the CMP do not necessarily present a direct conflict with a CLEC interconnection agreement, but would

¹ 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

² Throughout this document, the terms “include(s)” and “including” mean “including, but not limited to.”

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04-08-02

abridge or expand the rights of a party to such agreement, the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such agreement.

¹ 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

² Throughout this document, the terms “include(s)” and “including” mean “including, but not limited to.”

2.0 MANAGING THE CHANGE MANAGEMENT PROCESS

2.1 Managing the Change Management Process Document

The Change Management Process is dynamic in nature. Proposed modifications to the CMP framework shall be originated by means of discussion at any of the regularly scheduled Monthly Product/Process CMP meetings (standing agenda item at the Monthly Product/Process CMP meetings).

The initiator of the change would send an email with the redlined language and the reasons for the request attached at least 14 days in advance of the Product & Process CMP meeting. The request initiator would present the proposal to the CMP participants. The parties would develop a process for input into the proposed change. To incorporate a change into the CMP requires unanimous agreement [as indicated by **how**, as defined by the voting process]. Each proposal will be assigned a unique tracking number. Date, version and history log for the CMP. Include the proposal in the distribution package and on the agenda. The requested change will be reviewed at one CMP meeting and voted on no earlier than the following CMP meeting.

2.2 Change Management Point-of-Contact (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

2.3 Change Management POC List

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

¹ 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

² Throughout this document, the terms “include(s)” and “including” mean “including, but not limited to.”

2.4 Qwest CMP Responsibilities

2.4.1 CMP Managers

The Qwest CMP Product/Process Manager is the Qwest Product/Process POC and is responsible for properly processing submitted CRs, conducting the Monthly CMP Product/Process Meeting, assembling and distributing the meeting distribution package, and ensuring minutes are written and distributed in accordance with the agreed-upon timeline.

The Qwest CMP Systems Manager is the Qwest Systems POC and is responsible for properly processing submitted CRs, conducting the Monthly CMP Systems Meeting, assembling and distributing the meeting distribution package, and ensuring minutes are written and distributed in accordance with the agreed-upon timeline. The CMP Systems Manager also distributes the list of CRs eligible for prioritization to Qwest and the CLECs for ranking, tabulates the rankings, and forwards the resulting prioritization of the CRs to Qwest and the CLECs. In addition, the CMP Systems Manager is responsible for coordinating the publication of any Qwest OSS Interface release notification schedules.

2.4.2 Change Request Project Manager (CRPM)

The Qwest CRPM manages CRs throughout the CMP CR lifecycle. The CRPM is responsible for obtaining a clear understanding of exactly what deliverables the CR originator requires to close the CR, arranging the CR clarification meetings and coordinating necessary Subject Matter Experts (SMEs) from within Qwest to respond to the CR and coordinate the participation of the necessary SMEs in the discussions with the CLECs

2.4.3 Escalation/Dispute Resolution Manager

The Escalation/Dispute Resolution Manager is responsible for managing escalations and disputes in accordance with the CMP Escalation Process and Dispute Resolution Process.

2.5 Method of Communication

The method of communication is e-mail with supporting information posted to the web site when applicable (see Section 3.3 Qwest Wholesale CMP Web Site). Communications sent by e-mail resulting from CMP will include in the subject line "CMP". Email communications regarding document changes will include direct web site links to the related documentation.

Redlined PCATs and Technical Publications associated with product, process, and systems changes will be posted to the Qwest CMP Document Review Web site, <http://www.qwest.com/wholesale/cmp/review.html>. For the duration of the agreed upon comment period CLECs may submit comments on the proposed documentation change. At the Qwest CMP Document Review Web site CLECs may submit their comments on a specific

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document by selecting the “Submit Comments” link associated with the document. The “Submit Comments.” link will take CLECs to an HTML comment template. If for any reason the “Submit” button on the site does not function properly, CLEC may submit comments to cmpcomm@qwest.com. After the conclusion of the applicable CLEC comment period Qwest will aggregate all CLEC comments with Qwest responses and distribute to all CLECs via Notification email within the applicable period.

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3.0 MEETINGS

Change Management meetings will be conducted on a regularly scheduled basis, at least two consecutive days 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 CLEC. 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.

3.1 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
- 12 Month Development View
- Monthly System Outage Report
- Any other material to be discussed

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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.

3.2 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.

3.3 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 the 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, minutes, sign-up forms, and schedules
- A log of each type of change requests and associated status histories
- Meeting materials (distribution package)
- Meeting minutes
- Release announcements and other CLEC notifications and associated requirements

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- 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).
- Redlined PCAT and Technical Publications - see Section 2.5
- Instructions for receiving CMP communications – see Section 2.5

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4.0 TYPES OF CHANGE

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

4.1 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, or as agreed to by Qwest and CLECs. 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.

4.2 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)

4.3 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.

4.4 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.

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5.0 CHANGE REQUEST INITIATION PROCESS

5.1 CLEC-Qwest OSS Interface Change Request Initiation Process

The change request initiator will complete a Change Request Form (see Appendix X) 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 or paragraph numbers and the mandatory or recommended implementation date, if any. If a regulatory CR is implemented by a manual process and later it is determined that a change in circumstance warrants a mechanized solution, the CR originator must provide the evidence of the change in circumstance, such as an estimated volume increase or changes in technical feasibility.

Qwest or any CLEC may submit Regulatory and Industry Guideline CRs. Qwest will send CLECs a notice when it posts Regulatory or Industry Guideline CRs to the Web and identify when comments are due, as described below. Regulatory and Industry Guideline CRs will also be identified in the CMP Systems Monthly Meeting Distribution Package. 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 CRs may not be presented as walk-on items.

If Qwest or any CLEC has objected to the classification of a CR as Regulatory or Industry Guideline, that CR will be discussed at the next monthly Change Management Meeting. At that meeting, Qwest and the CLECs will attempt to agree that the CR is Regulatory or Industry Guideline. At that meeting, if Qwest or any CLEC does not agree that the CR is Regulatory or Industry Guideline, the CR will be treated as a non-Regulatory, non-Industry Guideline CR and prioritized with the CLEC-originated and Qwest-originated CRs, unless and until the CR is declared to be Regulatory or Industry Guideline through dispute resolution. Final determination of CR type will be made by the CLEC and Qwest designated representatives at that monthly meeting, and documented in the meeting minutes.

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Implementation Plan for Regulatory CRs

If agreement is reached at the monthly CMP meeting that a CR constitutes a Regulatory Change, then at that same meeting, Qwest will propose an implementation plan for compliance with a regulatory mandate. The proposal will include the criteria that Qwest used to determine the proposed method of implementation, including estimated volume, an estimated level of effort for implementing a manual solution, and an estimated level of effort for implementing a mechanized solution. Qwest will express the estimated levels of effort for these purposes in terms of a range of hours required to implement. If relied upon, the criteria may also include cost, estimated volume, number of CLECs, technical feasibility, parity with retail, or effectiveness/feasibility of manual process.

If the difference between the midpoint of each range of the estimated levels of effort for implementing the manual and mechanized solutions is less than 10% of the larger number, and Qwest did not rely upon other criteria in determining the proposed method of implementation, then the decision regarding whether to implement the manual or mechanized solution will be determined by the desires of the majority of the parties present at the monthly meeting where the implementation plan is presented. For example, if Qwest did not rely on other criteria, this provision applies where the midpoint of the level of effort for the mechanized solution is 2000 hours and the midpoint of the level of effort for the manual solution is 2200 hours, because the difference is 200 hours, which is less than 10% of 2200, or 220. After the implementation plan has been discussed at that meeting, Qwest will request that a representative of each CLEC and Qwest indicate their preference for the manual or the mechanized solution, e.g., by a show of raised hands. The determination will be made by the majority of parties that express a preference. The results will be reflected in the meeting minutes.

If Qwest is unable to fully implement a mechanized solution in the first release that occurs after the CMP participants agree that a change has been mandated, Qwest's implementation plan for the mechanized solution may include the short-term implementation of a manual work-around until the mechanized solution can be implemented. In that situation, the CR to implement the mechanized change will be treated as a Regulatory Change, notwithstanding the fact that a manual work-around is required for some interim period, and Qwest will continue to work that Regulatory CR until the mechanized solution is implemented.

Qwest's implementation plan for a manual solution may include a plan to implement a mechanized solution when and if estimated volume for the functionality justifies implementation of a mechanized solution. In that situation, a subsequent CR to implement the mechanized change must be submitted when estimated volume justifies implementation of the mechanized solution and will be treated as a Regulatory Change only if the CLECs and Qwest agree to such treatment. If the parties do not agree to treat such a CR as a Regulatory Change, it will be treated as a non-Regulatory Change.

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CLECs and Qwest will attempt to reach agreement on the implementation plan at the monthly CMP meeting at which the proposed implementation is presented.

If any CLEC objects to the proposed implementation plan because it disagrees with Qwest's assessment of the estimated volume, the CLEC must submit information to Qwest demonstrating that Qwest's volume estimate should be revised. The CLEC shall submit such information to Qwest within 5 business days after the monthly meeting.¹ Qwest shall consider all such information submitted and determine whether a revision of its volume estimate is appropriate. Within 10 business days after the monthly meeting, Qwest will notify CLECs via the mailout process whether it has determined that a revision of the volume estimate is appropriate. If it has revised the volume estimate, Qwest will include the revised volume estimate and will state whether the revised volume estimate results in a change to Qwest's estimated levels of effort to implement a manual and/or mechanized solution. If the volume estimate is revised and the revision results in a change to Qwest's estimated levels of effort to implement a manual and/or mechanized solution and/or Qwest's proposed implementation plan, Qwest will include the revised estimated levels of effort and the revised implementation plan in the notification. This implementation plan will be presented at the next monthly CMP meeting. CLECs and Qwest will attempt to reach agreement on the implementation plan at the monthly CMP meeting at which the revised implementation is presented.

The final determination regarding the implementation plan will be made by Qwest with input from CLECs, except where the estimated levels of effort for implementing the manual and mechanized solutions are not significantly different and the decision regarding whether to implement a manual or mechanized solution is determined by the CLECs, as set forth above. If no CLECs object to the proposed plan at the monthly meeting where it is first presented, final determinations will be made at that meeting and documented in the meeting minutes.

Qwest will present the proposed plan at the next monthly meeting only if all of the following apply:

- one or more CLECs object to the proposed plan at the monthly meeting where it is first presented,*
- one or more CLECs submit additional volume estimate information as set forth above, and*
- the additional information submitted by CLECs results in a revision to the implementation plan.*

If all of the above apply, resulting in a revised implementation plan, then Qwest will present the revised implementation plan at the next monthly meeting. Final determinations regarding the

¹ *If necessary, a CLEC may indicate that such information is confidential by marking each page with the word "Confidential." If Qwest receives information pursuant to this provision that is marked "Confidential", Qwest will not disclose such confidential information to any other CLEC, but Qwest may use such confidential information to revise its demand estimate, if appropriate, and may disclose its revised demand estimate.*

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implementation plan will be made at that monthly meeting and documented in the meeting minutes.

If any CLEC does not agree with the final implementation plan, the objecting CLEC may initiate dispute resolution under the CMP 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.

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 contact information
 - 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

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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 months 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:

- "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 Level of Effort
 - Identification of any CR which is a duplicate, in part or whole, to the CR being presented.
- "Denied" (Qwest will not implement the CLEC or Qwest request) with basis for the denial, in writing, including reference to substantiating material. . CLEC-initiated OSS Interfaces and Product/Process change request may be denied for one or more of the following reasons.
 - Technologically not feasible—a technical solution is not available, (+)
 - Regulatory ruling/Legal implications—regulatory or legal reasons prohibit the change as requested, implementing the request may negatively impact a performance measurement (PID) incorporated into a performance assurance plan, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions) (+)
 - Qwest policy —the procedure is working, the requested change is not beneficial (more objective, less subjective) (-)
 - Outside the Scope of the Change Management Process—the request is not within the scope of the Change Management Process, requests for information (as defined in the Master Red-line document) (+)
 - Economically not feasible—low demand, cost prohibitive to implement the request, or both. (+)
 - Qwest will not deny a CR solely on the basis that the CR involves a change to the back-end systems.
 - Qwest will apply these same concepts to CRs that they initiate.
 - SCRIP may be invoked if a CR was denied due to Economically not feasible.

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

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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.

At the last Systems CMP meeting before Prioritization, Qwest will facilitate the presentation of all CRs eligible for Prioritization. At this meeting Qwest will provide a high level estimate of the Level of Effort of each CR and the estimated total capacity of the release. This estimate will be an estimate of the number of person hours required to incorporate the CR into the release. Ranking will proceed, as described in Section 10.2. The results of the ranking will produce a release candidate list.

5.2 CLEC-Qwest OSS Interface Change Request Lifecycle

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

5.2.1 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. During business and system requirements, any candidates which have affinities and may be more efficiently implemented together will be discussed. Candidates with affinities are defined as candidates with similarities in functions or software components. Qwest will also present any complexities, changes in candidate size, or other concerns that may arise during business or system requirements which would impact the implementation of the candidate. 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 release candidate list and the new CRs will be prioritized by CLECs in accordance with the agreed upon Prioritization Process (see Section 10.0). 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.

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5.2.2 Packaging

At the conclusion of system requirements, Qwest will present packaging option(s) for implementing the release candidates. Packaging options are defined as different combinations of candidates proposed for continuing through the next stage of development. Packaging options may not exist for the release. I.e. there may only be one straightforward set of candidates to continue working through the next stage of development. Options may be identified due to:

- affinities in candidates
- resource constraints which prevent some candidates from being implemented but allow others to be completed.

Based upon additional information gathered during the business and systems requirement phase, Qwest will provide an updated Level of Effort of each CR and the estimated total capacity of the release. If more than one option is presented, a vote will be held within 2 days after the meeting on the options. The option with the largest number of votes will continue through the design phase of the development cycle.

5.2.3 Design

Qwest engineers define the architectural and code changes required to complete the work associated with each candidate. The design work is completed on the candidates which have been packaged.

5.2.4 Commitment

After design, Qwest will present a final list of candidates which can be implemented. Qwest will provide an updated level estimate of the Level of Effort of each CR and the estimated total capacity of the release. These candidates become the committed candidates for the release.

5.2.5 Code & Test

Qwest engineers will perform the coding and testing by Qwest required to complete the work associated with the committed candidates. The code is developed and baselined before being delivered to system test. A system test plan (system test cases, costs, schedule, test environment, test data, etc.) is completed. The system is tested for meeting business and system requirements, certification is completed on the system readiness for production, and pre-final documentation is reviewed and baselined. 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 options with the CLECs in the next CMP meeting. Options can include 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 whether or not the candidate could become a candidate for the next point release, with

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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.

5.2.6 Deployment

During this phase Qwest representatives from the business and operations review and agree the system is ready for full deployment. The release is deployed and production support initiated and conducted.

During any phase of the lifecycle, a candidate may be requested to be removed by the requesting CLEC. If that occurs, the candidate will be discussed at the next CMP meeting or in a special emergency meeting, if required. The candidate will only be removed from further phases of development if there is unanimous agreement by the CLECs and Qwest at that meeting.

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.

5.3 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.

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:

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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,
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- Description of CR
- originating CLEC
- assigned CRPM contact information
- 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, in writing, including reference to substantiating material. CLEC-initiated OSS Interfaces and Product/Process change request may be denied for one or more of the following reasons.
 - Technologically not feasible—a technical solution is not available, (+)
 - Regulatory ruling/Legal implications—regulatory or legal reasons prohibit the change as requested, implementing the request may negatively impact a performance measurement (PID) incorporated into a performance assurance plan, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions) (+)
 - Qwest policy —the procedure is working, the requested change is not beneficial (more objective, less subjective) (-)
 - Outside the Scope of the Change Management Process—the request is not within the scope of the Change Management Process, requests for information (as defined in the Master Red-line document) (+)

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- Economically not feasible—low demand, cost prohibitive to implement the request, or both. (+)
- Qwest will not deny a CR solely on the basis that the CR involves a change to the back-end systems.
- Qwest will apply these same concepts to CRs that they initiate.
- SCRP may be invoked if a CR was denied due to Economically not feasible.
- 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 statused 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.

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

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6.0 OSS INTERFACE RELEASE CALENDAR

Qwest will provide a rolling 12 month OSS Interface release calendar in the distribution package of the first scheduled CMP Systems Meeting of each quarter. The calendar will show release schedules, for all OSS Interfaces within the scope of CMP starting in that quarter and for a total of 12 months in the future. The schedule entries will be made when applicable for application to application interfaces:

- Name of OSS Interface
- Date for CMP CR Submission Cutoff
- Date for issuing Draft Release Notes
- Date when Initial Notice for New Interfaces and Interface Retirements will be issued; date when comparable functionality will be available.
- Date for issuing Initial or Draft Technical Specifications
- Comment cycle timeline
- Prioritization, packaging and commitment timeline
- Date for issuing Final Technical Specifications
- Testing period
- Date for issuing Final Release Notes
- Planned Implementation Date
- Release sunset dates

The release calendar will be posted on the CMP web site as a stand-alone document.

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7.0 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).

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.

7.1 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.

7.1.1 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

7.1.2 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.

7.1.3 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.

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7.1.4 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
- Draft Connectivity and Firewall Rules
- Draft Test Plan

7.1.5 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 and ending one-hundred and six (106) 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.

7.1.6 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.

7.1.7 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.

7.1.8 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.

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7.1.9 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
 - 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.

7.2 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

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7.2.1 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.

7.2.2 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.

7.2.3 Final Notification

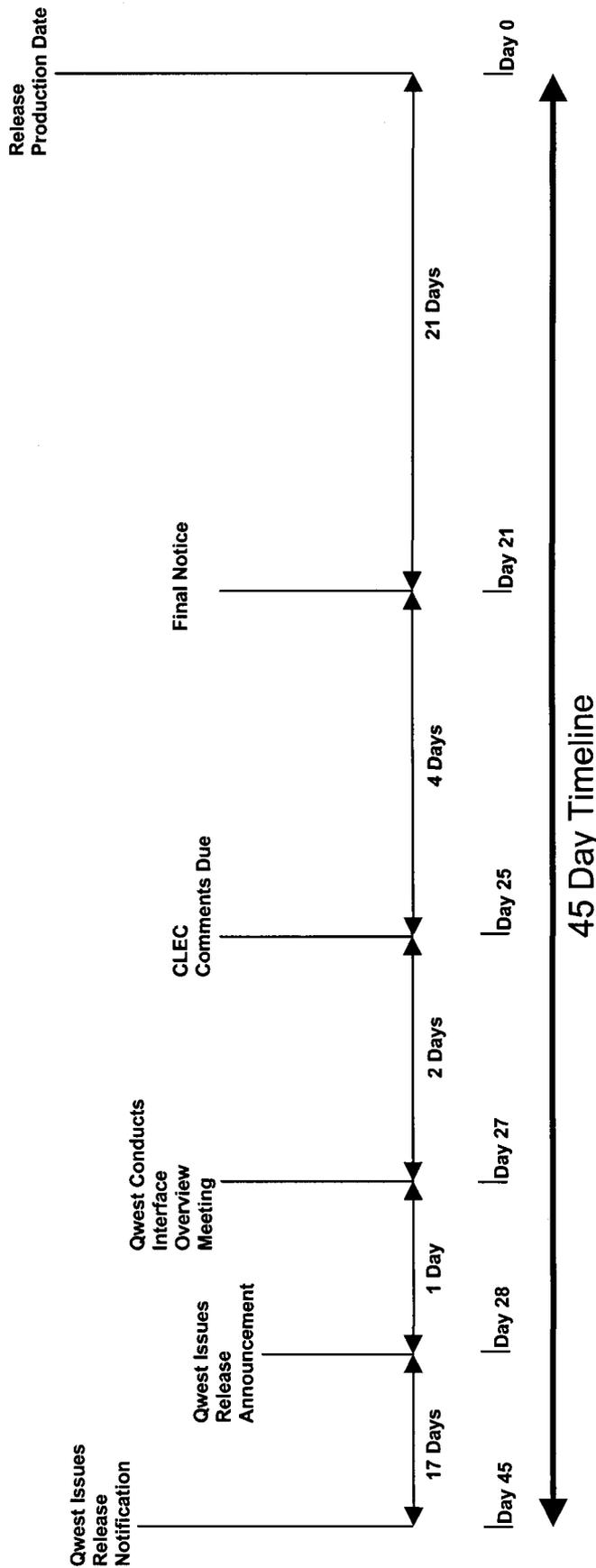
Qwest will issue a final notice no less than twenty-one (21) calendar days prior to the Release Production date. The final notice will include:

- 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
- Final Implementation date.

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



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

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8.0 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 Releases of IMA EDI will only be modified as a result of production support changes. When such production support changes are made, Qwest will also modify the related documentation. All other changes become candidates for future IMA EDI releases.

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

Graphical User Interface (GUI)

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

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

8.1 Application-to-Application Interface

This section describes the timelines that Qwest, and any CLEC choosing to implement on the Qwest Release Production Date, will adhere to in changing existing interfaces.² 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.

² 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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8.1.1 Draft Interface Technical Specifications

Prior to Qwest implementing a change to an existing interface, Qwest will notify CLECs of the draft Technical Specifications. Qwest will provide draft technical specifications at least seventy-three (73) calendar days prior to implementing the release unless an exception has been granted (see Section 8.0) 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.

8.1.2 Content of Draft Interface Technical Specifications

The Notification letter will contain:

- Written summary of change(s)
- Target time frame for implementation

Draft Technical Specifications documentation, or instructions on how to access the draft Technical Specifications documentation on the Web site.

8.1.3 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.

8.1.3.1 Walk through Notification Content

This notification will contain:

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

8.1.3.2 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.

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8.1.4 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.

8.1.5 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.

8.1.6 Final Interface Technical Specifications

The notification letter resulting from the CLEC's comments from the Initial Release Notification will constitute the Final Technical Specifications. After the Final Technical Specifications are published, there may be other changes made to documentation or the coding that is documented in the form of addenda. The following is a high level overview of the current disclosure, release and addendum process:

- Draft Developer Worksheets -- 45 days prior to a release the draft Developer Worksheets are made available to the CLEC's.
- Final Disclosure – 5 weeks prior to a release the Final Disclosure documents, including I charts and developer worksheets are made available to the CLECs.
- Release Day – On release day only those CLECs using the IMA GUI are required to cut over to the new release.
- 1st Addendum – 2 weeks after the release the 1st addendum is sent to the CLECs.
- Subsequent Addendum's – Subsequent addendum's are sent to the CLECs after the release as needed. There is no current process and timeline.
- EDI CLECs – 6 months after the release those CLECs using EDI are required to cut over to the new release. CLECs are not required to support all new releases.

8.1.7 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)

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- 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.

8.1.8 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.

8.2 Graphical User Interface (GUI)

8.2.1 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 has been granted. 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.

8.2.2 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.

8.2.3 CLEC Comments on Draft Interface Release Notice

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

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8.2.4 Qwest Response to Comments

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

8.2.5 Content of Final Interface release Notice

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

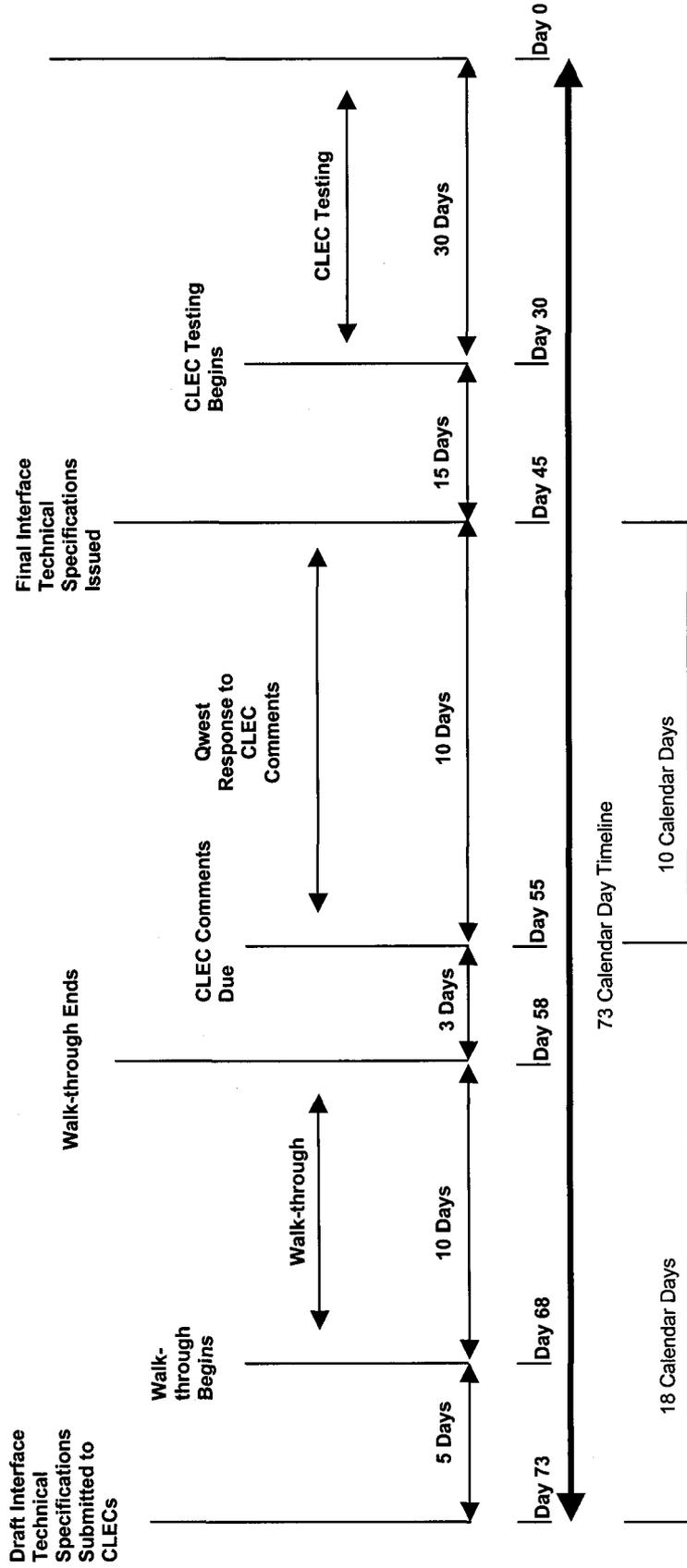
- Final notification letter
- Summary of changes from draft interface release notice
- Final user guide (or revised pages)
- Release date

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



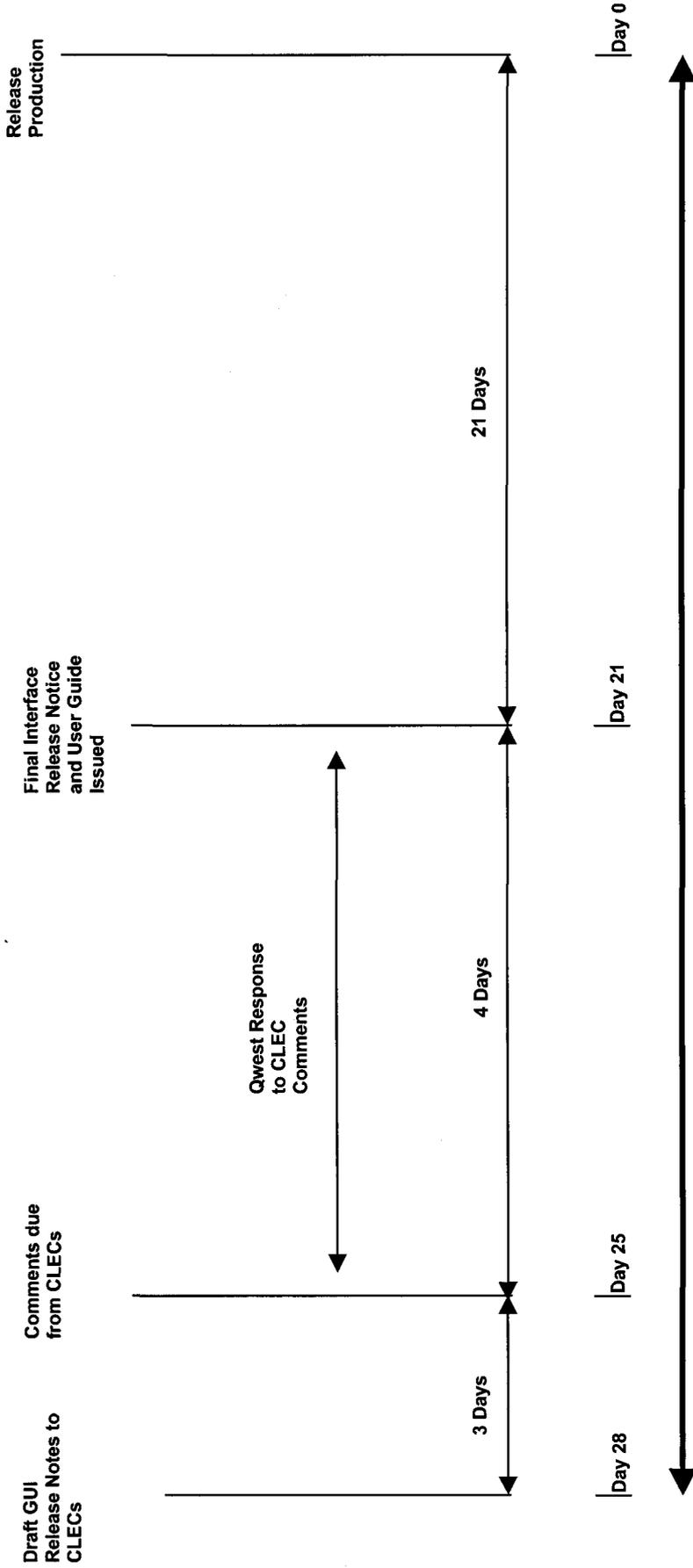
The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

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



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

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9.0 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.

9.1 Application-to-Application OSS Interface

9.1.1 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.

9.1.2 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

9.1.3 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.

9.1.4 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 that an interface with comparable functionality is available no less than six months prior to retirement of an Application-to-Application interface.

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9.1.5 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
- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

9.2 Graphical User Interface (GUI)

9.2.1 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.

9.2.2 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

9.2.3 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.

9.2.4 Comparable Functionality

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

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9.2.5 Final Retirement Notice

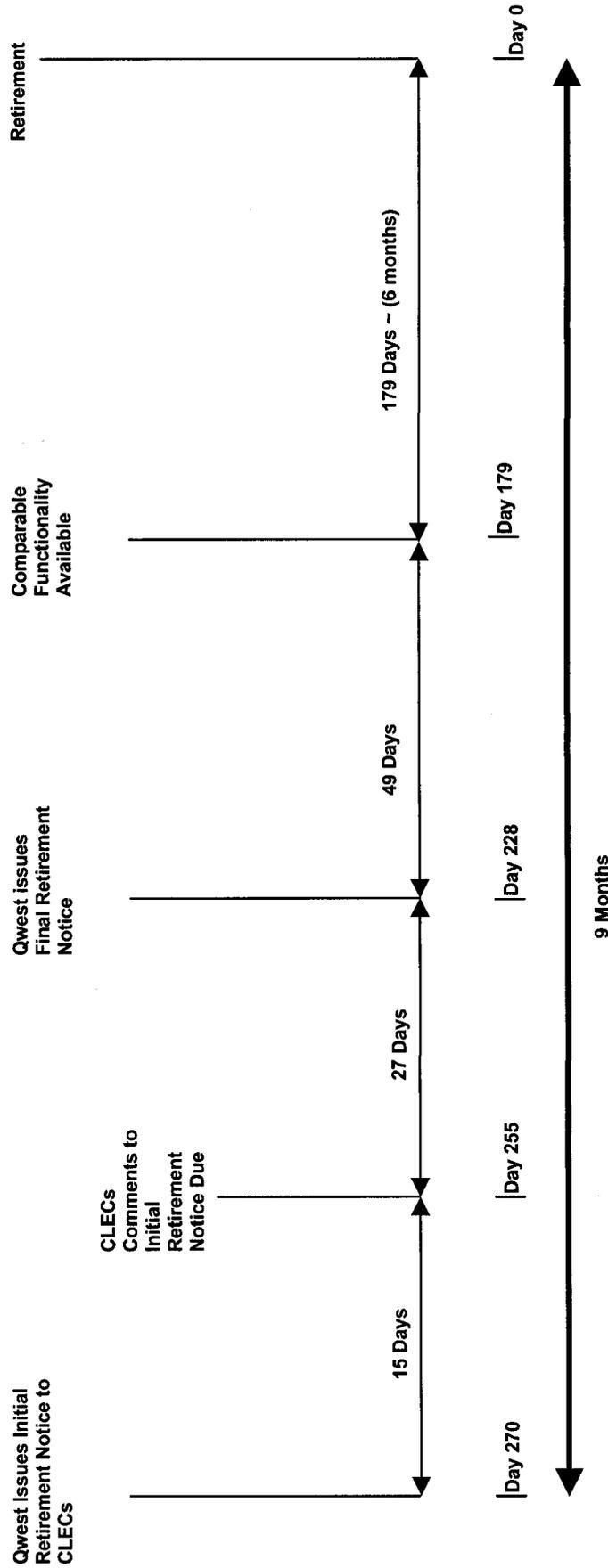
The Final Retirement Notice will be provided to CLECs no later than twenty-one (21) calendar days following the initial retirement notice for GUI retirements. The Final Retirement Notice will contain:

- 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

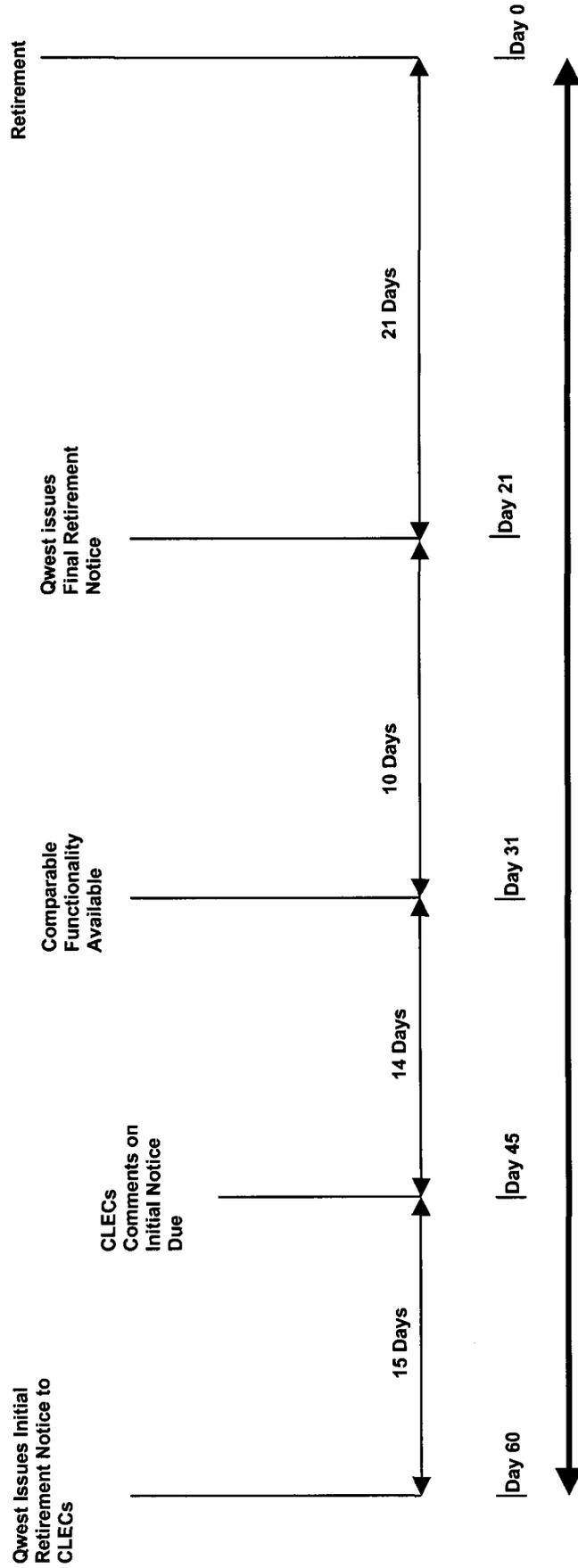


The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

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



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

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10.0 PRIORITIZATION

Each OSS Interface and Test Environment release is prioritized separately. If the Systems CMP Change Requests for any interface or test environment do not exceed release capacity, no prioritization for that release is required. The prioritization process provides an opportunity for CLECs to prioritize CLEC and Qwest originated OSS Interface change requests (CRs). 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 7.0 and 9.0, respectively.

10.1 Regulatory and Industry Guideline Change Requests

Regulatory and Industry Guideline changes, are defined in Section 4.0. , Separate procedures are required for prioritization of CRs requesting Regulatory and Industry Guideline changes to ensure that Qwest can comply with the recommended or required implementation date, if any. The process for determining whether a CR is Regulatory Change or Industry guideline is set forth in Section 5.1.

Qwest will send CLECs a notice when it posts Regulatory or Industry Guideline CRs to the Web and identify when comments are due, as described in Section 5.1. Regulatory and Industry Guideline CRs will also be identified in the CMP Systems Monthly Meeting Distribution Package.

10.1.1 Regulatory Changes

For Regulatory Changes, Qwest will implement changes no later than the time specified in the legislation, regulatory requirement, court ruling, or PAP. If no time is specified, Qwest will implement the change as soon as practicable. For Regulatory changes arising from a PAP, Qwest will implement changes no later than the date on which the applicable standard becomes effective.

Regulatory CRs will be ranked with all other CRs. If the implementation date for a Regulatory CR requires all or a part of the change to be included in the upcoming Major Release, the CR will not be subject to ranking and will be automatically included in that Major Release.

10.1.2 Industry Guideline Changes

For Industry Guideline changes, Qwest will use the national implementation timeline, if any. If no national implementation timeline is specified, Qwest will implement any related changes as soon as practicable, taking into account the benefit of the guideline change and CLEC input regarding the implementation timeline.

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Industry Guideline CRs will be ranked with all other CRs. If the recommended implementation date for a Industry Guideline CR requires all or a part of the change to be included in the upcoming Major Release, the CR will not be subject to ranking and will be automatically included in that Major Release, unless Qwest and CLECs unanimously agree otherwise.

10.1.3 Regulatory and Industry Guideline Change Implementation

When more than one Major Release is scheduled before the mandated or recommended implementation date for a Regulatory or Industry Guideline CR, Qwest will present information to CLECs regarding any technical, practical, or development cycle considerations, as part of the CR review and up to the packaging options, that may affect Qwest's ability to implement the CR in any particular Major Release. At the monthly CMP meeting where the Regulatory or Industry Guideline CR is presented, Qwest will advise CLECs of the possible scheduled releases in which Qwest could implement the CR and the CLECs and Qwest will determine how to allocate those CRs among the available Major Releases, taking into account the information provided by Qwest regarding technical, practical, and/or development considerations. If the Regulatory or Industry Guideline CR is not included in a prior release, it will be implemented in the latest release specified by Qwest.

10.2 Prioritization Process

10.2.1 Prioritization Review

At the last Monthly Systems CMP Meeting before Prioritization, Qwest will facilitate a Prioritization Review including a discussion for all CRs eligible³ for prioritization in a major release. Qwest will distribute all materials five (5) calendar days prior to the prioritization review. The materials will include:

- Agenda
- Summary document of all CR candidates eligible for prioritization. (see Appendix A - Sample – IMA 11.0 Rank Eligible CRs)

Both CLECs and Qwest should have appropriate subject matter experts in attendance at the Prioritization Review. The review and discussion meetings are open to all CLECs.

The Prioritization Review objectives are to:

- Introduce newly initiated CLEC and Qwest OSS Interface and test environment change requests.

³ *Eligible CR's are Qwest and CLEC initiated CR's as defined in Section X. [This definition may change depending on how the CMP Redesign Team resolves regulatory and industry guideline changes]*

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- Allow CLECs and Qwest to prioritize eligible OSS Interface or test environment change requests by providing specific input as to the relative importance that CLECs, as a group, and Qwest assign to each such change request.

10.2.2 Ranking

Within three (3) business days following the CMP Meeting that includes the Prioritization Review, Qwest will distribute the Prioritization Form for ranking. Ranking should be conducted according to the following guidelines:

- Each CLEC and Qwest may submit one numbered ranking of the Release Candidate List. The ranking must be submitted by the primary Point of Contact (POC, the secondary POC, or CMP Team Representative). The ranking will be submitted to the Qwest Systems CMP Manager in accordance with the guidelines described in Section 10.2.3 below. Refer to Appendix B: Sample – IMA 11.0 Initial Prioritization Form
- Qwest and each CLEC ranks each change request on the Release Candidate List by providing a point value from 1 through n, where n is the total quantity of CRs. The highest point value should be assigned to the CR that Qwest and CLECs wish to be implemented first. The total points will be calculated by the Qwest Systems CMP Manager and the results will be distributed to the CLECs in accordance with the Prioritization Process described in Section 10.2.3 below. Refer to Appendix C – Sample – IMA 11.0 Prioritization List.

10.2.3 Ranking Tabulation

CLECs and Qwest who choose to vote must submit their completed Prioritization Form via e-mail within three (3) business days following Qwest's distribution of the Prioritization Form. Within two (2) business days following the submission of ranking, Qwest will tabulate all rankings and e-mail the resulting Initial Prioritization List to the CLECs. The results will be announced at the next scheduled CMP Monthly Meeting. Prioritization is based on the results of the votes received by the deadline. Based on the outcome of the final ranking of the CR candidates, an Initial Prioritization List is produced. Qwest will place in order the candidates based on the ranking responses received by the deadline.

10.2.4 Ranking of Late Added CRs

For those late added CRs that are eligible for inclusion, as a candidate, in the most recently prioritized release (Section 10.2.4), the prioritization process will be as follows:

- Within three (3) business days following the CMP Meeting that resulted in the decision to include the late added CR as a candidate in the recently prioritized release, Qwest will distribute the late added CR for ranking, along with the initial prioritization.
- Each CLEC and Qwest may submit a suggested rank for the late added CR. The suggested rank will be the number, from 1-n, corresponding to the position on the Initial Prioritization List that the CLEC or Qwest believes the late added CR should be inserted.

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- CLECs and Qwest who choose to vote must return their suggested rank for the late added CR via e-mail within three (3) business days following Qwest's distribution of the late added CR for ranking.

Within two business days following the return of the suggested rank, Qwest will tabulate the results by averaging the returned suggested ranks for the late added CR. Qwest will insert the late added CR into the Initial Prioritization List at the resulting point on the list and will renumber the remaining candidates on the list based on this insertion. Qwest will e-mail the newly resulting Initial Prioritization List to the CLECs. The results will be announced at the next scheduled CMP Monthly Meeting.

10.3 Special Change Request Process (SCRP)

In the event that a Systems CR is not ranked high enough in prioritization for inclusion in the next Release, the CR originator may elect to invoke the CMP Special Change Request Process (SCRP) as described in this section. The SCRCP does not supercede the process defined in Section 5.0 (Change Request Initiation Process).

To invoke the SCRCP, the CR originator must send an e-mail to the Qwest CMP SCRCP mailbox (URL TBD). The subject line of the e-mail message must include:

- "SCRCP REQUEST"
- CR originator's company name
- CR number and title

The text of the e-mail message must include a description of the CR, CR originator's name, phone number, and e-mail address, and the circumstances which have necessitated the invocation of the SCRCP.

Qwest will acknowledge receipt of the complete SCRCP e-mail with a confirmation e-mail no later than two (2) business days following receipt of the SCRCP e-mail. If the SCRCP e-mail does not contain the required information, Qwest will notify the originator within two (2) business days following receipt of the SCRCP e-mail requesting information not included in the original SCRCP e-mail. When the SCRCP e-mail is complete, the confirmation e-mail will include:

- Date and time of receipt of complete SCRCP e-mail
- Date and time of confirmation e-mail
- SCRCP title and number
- The name, telephone number and e-mail of the Qwest contact assigned to process the SCRCP

Within ten (10) business days after the confirmation e-mail, Qwest will schedule and hold a meeting to work with the SCRCP Originator to prepare the SCRCP form.

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SCRP may be invoked prior to prioritization. Analysis on the cost would be done for a fee. CLEC may decide to invoke SCRCP process up to 5 days after prioritization results are posted. If the estimate increases, Qwest will communicate the cost increase. If the CLEC chooses to cancel the request during the process, the CLEC will pay all costs incurred by Qwest up to that point.

This form shall be accompanied by the non-refundable Processing Fee specified in Attachment X. The form will request, and the originator will need to provide the following information as well as any additional information that may be helpful in describing and analyzing SCRCP originator's request:

- [Information TBD]

As soon as feasible, but in any case within (x) business days after receipt of a completed SCRCP form, Qwest will provide the SCRCP originator with a SCRCP quote. The SCRCP quote will, at a minimum, include the following information:

- A description of the work to be performed
- Development costs
- Targeted release
- [Additional elements TBD]Qwest agrees with AT&T Comments

The SCRCP originator has (x) business days, upon receipt of the SCRCP quote, to either agree to purchase under the quoted price or cancel its SCRCP.

Once development work has begun, if at any time the SCRCP originator decides to cancel the SCRCP, the SCRCP originator will pay Qwest's reasonable development costs incurred in providing the requested functionality.

All time intervals within which a response is required from one Party to another under this Section are maximum time intervals. Each Party agrees that it will provide all responses in writing to the other Party as soon as the Party has the information and analysis required to respond, even if the time interval stated herein for a response is not over.

The foregoing process applies to Qwest and CLEC originated CRs. In the event a Qwest CR is submitted through this process, Qwest agrees that it will not divert IT resources available to work on the systems CRs for the next Release to support Qwest's SCRCP request. Like CLECs, Qwest will have to apply separate, additional resources to CR it seeks to implement through the SCRCP.

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11.0 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 [intended for those CLECs that are not currently in production or that want to test new ordering or pre-ordering transactions for which they have not been through testing – move to Terms], 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

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those OSS Interface exchange requests. The CTE will also provide the opportunity for regression testing of OSS Interface functionality.

11.1 Testing Process

Qwest will send an industry notification, including testing schedules (see Section 8.0 – 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 12.0.

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12.0 PRODUCTION SUPPORT

12.1 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.

12.2 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 12.X. 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.

12.3 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 12.X. Severity 1 and Severity 2 IT trouble tickets will be

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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 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. 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 5.0 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.

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12.4 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.

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.

12.5 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.

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.

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- 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.

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

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- 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:

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

12.6 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 Process 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).

12.7 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

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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.

Severity Level of Ticket	Notification interval for initial ticket	Notification Interval for any Change in Status	Notification Interval for No Change in Status	Notification Interval upon Resolution
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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13.0 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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14.0 ESCALATION PROCESS

14.1 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.

14.2 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. late provider escalation level.

- 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.

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- 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
- 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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15.0 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. 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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APPENDIX A: SAMPLE - IMA 11.0 RANK ELIGIBLE CRS

#	CR Number	Interface	Submit Date	Company	Status	Title	Shirt Size	Est LOE Min	Est LOE Max	CR Presenter	Ranking Note
Category A: Not Rank Eligible											
1	14886	IMA Common	9/28/01	Qwest	Pending Withdrawal	Pre-order Transaction: Due Date availability & standard intervals	Extra Large	5501	8000	Winston, Connie	Category A: Not Rank Eligible
2	23943	IMA Common	9/28/01	Qwest	Pending Withdrawal	Shared Distribution Loop- Long Term	Large	3001	5500	Winston, Connie	Category A: Not Rank Eligible
3	25505	IMA Common	9/28/01	Qwest	Pending Withdrawal	Line Splitting for UNE-P accounts	Large	3001	5500	Winston, Connie	Category A: Not Rank Eligible
4	25591	IMA Common	9/26/01	Qwest	Pending Withdrawal	Flowthrough validate LPIC LSR Entries	Medium	751	3000	Winston, Connie	Category A: Not Rank Eligible
5	25800	IMA Common	9/28/01	Qwest	Pending Withdrawal	Add New Auto Push Statuses	Medium	751	3000	Winston, Connie	Category A: Not Rank Eligible
6	27751	IMA Common	9/28/01	Qwest	Pending Withdrawal	Intrabuilding Cable	Large	3001	5500	Winston, Connie	Category A: Not Rank Eligible
7	27756	IMA Common	9/26/01	Qwest	Pending Withdrawal	Cancellation Remarks	Small	201	750	Winston, Connie	Category A: Not Rank Eligible
Category B: Above the Line											
1	SCR013002-6	IMA Common	1/30/02	Qwest	Clarification	PID Impact - PO-2B: Unbundled Loop and Local Number Portability Edits	Large	3001	5500	Martain, Jill	Category B: Above the Line
2	SCR013002-7	IMA Common	1/30/02	Qwest	Clarification	PID Impact - PO-2B: Resale POTS Edits	Large	3001	5500	Martain, Jill	Category B: Above the Line
Category C: Rank Eligible											
1	24652	IMA Common	9/28/01	Qwest	Presented	Unbundled DID/PBX Trunk Port Facility move from LS to PS	Medium	751	3000	Winston, Connie	Category C: Rank Eligible
2	25091	IMA Common	9/26/01	Qwest	Presented	DSL Flowthrough - Re-Branding	Large	3001	5500	Winston, Connie	Category C: Rank Eligible
3	26636	IMA Common	9/28/01	Qwest	Presented	Shared Loop Enhancements	Medium	751	3000	Winston, Connie	Category C: Rank Eligible
4	30212	IMA Common	9/28/01	Qwest	Presented	Add New: UNE-P PAL to IMA	Large	3001	5500	Winston, Connie	Category C: Rank Eligible
5	30215	IMA Common	10/23/01	Qwest	Presented	Wholesale Local Exchange Freeze	Large	3001	5500	Winston, Connie	Category C: Rank Eligible
6	31766	IMA Common	9/28/01	Qwest	Presented	Reject Duplicate LSRs	Medium	751	3000	Martain, Jill	Category C: Rank Eligible
7	5043011	IMA GUI	8/31/00	Eschelon	Presented	Add an online glossary of the field title abbreviations to help menu of IMA GUI	Medium	751	3000	Eschelon	Category C: Rank Eligible

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APPENDIX B: SAMPLE - IMA 11.0 INITIAL PRIORITIZATION FORM

Assigned Point Value (see instructions)	#	CR Number	Title	Company	Interface	Products Impacted	Shirt Size	Est LOE Min	Est LOE Max
	1	24652	Unbundled DID/PBX Trunk Port Facility move from LS to PS	Qwest	IMA Common	Unbundled PID/PBX Trunk Port	Medium	751	3000
	2	25091	DSL Flowthrough - Re-Branding	Qwest	IMA Common	DSL	Large	3001	5500
	3	26636	Shared Loop Enhancements	Qwest	IMA Common	Shared Loop	Medium	751	3000
	4	30212	Add New UNE-P PAL to IMA	Qwest	IMA Common	UNE-P PAL	Large	3001	5500
	5	30215	Wholesale Local Exchange Freeze Based on CSRs	Qwest	IMA Common	All	Large	3001	5500
	6	31766	Reject Duplicate LSRs	Qwest	IMA Common	All Products	Medium	751	3000
	7	5043011	Add an online glossary of the field title abbreviations to help menu of IMA GUI	Eschelon	IMA GUI	All Products	Medium	751	3000
	8	5043076	Create a separate field for line numbers in EDI responses	Eschelon	IMA EDI		Large	3001	5500
	9	5206704	Add OCh capable loop LSR to IMA	ELI	IMA Common	DS1, DS3 & OCh Loop Orders	Large	3001	5500
	10	5405937	CLECs require availability to view completed LSR information in IMA GUI	Verizon	IMA GUI	Resale	Large	3001	5500
	11	5498578	Ability to send dual CFA information on an LSR for HDSL orders	WorldCom	IMA Common	HDSL	Small	201	750
	12	SCR010902-1	Limited IMA GUI Access for Pre-Order Transactions Only	McLeodUSA	IMA GUI	All	Medium	751	3000
	13	SCR012202-1	Incorrect Consolidation of DR5 USOC in IMA	Qwest	IMA Common	ISDN PRI	Medium	751	3000
	14	SCR013002-3	IMA Pre-Order - Use CCNA to retrieve a Design Layout Report (DLR)	Qwest	IMA Common		Medium	751	3000
	15	SCR013002-4	Revision of IOS field in IMA	Qwest	IMA GUI	UNE-P, Resale	Medium	751	3000
	16	SCR013002-5	PIC Freeze Documentation	Qwest	IMA Common	Resale, UNE	Medium	751	3000

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APPENDIX C: SAMPLE - IMA 11.0 INITIAL PRIORITIZATION LIST

RANK	TOTAL POINT VALUE	CR Number	Title	Company	Interface	Products Impacted	Shirt Size	Est LOE Min	Est LOE Max	Original List #
1	251	SCR013102-15	LSOG 6 - Upgrade Field Numbering and Naming to Existing Qwest Forms & EDI Maps (FOUNDATION CANDIDATE) (NOTE: Per February CMP Meeting Discussion, this CR should be ranked higher than all other LSOG 6 Change Requests)	Qwest	IMA Common	All Products	Extra Large	5501	8000	32
2	231	SCR013002-8	Flowthrough on Sup 2 Category Due Date	Qwest	IMA Common	All Products except Designed Products	Large	3001	5500	17
3	227	SCR101901-1	Allow customers to move and change local service providers at the same time. (NOTE: Per February CMP Meeting Discussion, this CR should be ranked higher than #26)	Eschelon	IMA Common	Centrex Resale UNE-P	Extra Large	5500	8000	35
4	214	31766	Reject Duplicate LSRs	Qwest	IMA Common	All Products	Medium	751	3000	6
5	211	SCR013002-3	IMA Pre-Order - Use CCNA to retrieve a Design Layout Report (DLR)	Qwest	IMA Common		Medium	751	3000	14

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DEFINITION OF TERMS

Term	Definition
CLEC	A telecommunications provider that has authority to provide local exchange telecommunications service on or after February 8, 1996, unless such provider has been declared an Incumbent Local Exchange Carrier under the Federal Telecommunications Act of 1996.
Software Defects	A problem with system software that is not working according to the Technical Specifications and is causing detrimental impacts to the users.
Design, Development, Notification, Testing, Implementation and Disposition	<p>Design: To plan out in a systematic way. Design at Qwest includes the Business Requirements Document and the Systems Requirements Document. These two documents are created to define the requirements of a Change Request (CR) in greater detail such that programmers can write system software to implement the CR.</p> <p>Development: The process of writing code to create changes to a computer system or sub system software that have been documented in the Business Requirements and Systems Requirements.</p> <p>Notification: The act or an instance of providing information. Various specific notifications are documented throughout the CMP. Notifications apply to both Systems and Product & Process changes</p> <p>Testing: The process of verifying that the capabilities of a new software Release were developed in accordance with the Technical Specifications and performs as expected. Testing would apply to both Qwest internal testing and joint Qwest/CLEC testing.</p> <p>Implementation: The execution of the steps and processes necessary in order to make a new Version of a computer system available in a particular environment. These environments are usually testing environments or production environments.</p> <p>Disposition: A final settlement as to the treatment of a particular</p>

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Term	Definition
	Change Request.
Good Faith	"Good faith" means honesty in fact and the observance of reasonable commercial standards of fair dealing.
OSS Interface	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.
OSS Application to Application Interface Testing Controlled Production Testing	Controlled Production process is designed to validate CLEC ability to transmit transactions that meet industry standards and complies with Qwest business rules. Controlled Production consists of submitting requests to the Qwest production environment for provisioning as production orders with limited volumes. Qwest and CLEC use Controlled Production results to determine operational readiness for full production turn-up.
Initial Implementation Testing	This type of application-to-application testing allows a CLEC to validate its technical development of an OSS Interface before turn-up in production of new transactions or significantly changed capabilities.
Interoperability Testing Environment	A production copy of IMA. It interfaces directly with Qwest's production systems for pre-order and order processing. As a result, all interoperability pre-order queries and order transactions are subjected to the same edits as production orders. A CLEC uses account data valid in Qwest production systems for creating scenarios on Qwest-provided templates, obtains approval on these scenario templates, and then submits a minimum set of test scenarios for all transactions it wishes to perform in production. Interoperability testing provides CLECs with the opportunity to validate technical development efforts and to quantify processing results.

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Term	Definition
Level of Effort	Estimated range of hours required to implement a Change Request
Migration Testing	Process to test in the Customer Testing Environment a subsequent application-to-application Release from a previous Release. This type of testing allows a CLEC to move from one Version to a subsequent Version of a specific OSS Interface.
Regression Testing	Process to test, in the Customer Test Environment, OSS Interfaces, business process or other related interactions. Regression Testing is primarily for use with 'no intent' toward meeting any Qwest entry or exit criteria within an implementation process. Regression Testing includes testing transactions previously tested, or certified.
Release <ul style="list-style-type: none"> • Major Release • Point Release • Patch Release 	A Release is an implementation of changes resulting from a CR or production support issue for a particular OSS Interface There are three types of releases for IMA.: <ul style="list-style-type: none"> • Major Release may be CLEC impacting (to systems code and CLEC operating procedures) via EDI changes, GUI changes, technical changes, or all. Major Releases are the primary vehicle for implementing systems Change Requests of all types (Regulatory, Industry Guideline, CLEC-originated and Qwest-originated). • Point Release may not be CLEC code impacting, but may affect CLEC operating procedures. The point release is used to fix bugs introduced in previous releases, technical changes, make changes to the GUI, and/or deliver enhancements to IMA disclosed in a major release that could not be delivered in the timeframe of the major release. • Patch Release is a specially scheduled system change for the purpose of installing the software required to resolve an issue associated with a trouble ticket.
Release Production Date	The Release Production Date is the date that a software Release is first available to the CLECs for issuance of production transactions.

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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, 02-20-02, 03-07-02, 04-04-02,
04-08-02

Term	Definition
Sub-systems	A collection of tightly coupled software modules that is responsible for performing one or more specific functions in an OSS interface.
Stand-alone Testing Environment (SATE)	A Stand-Alone Testing Environment is a test environment that can be used by CLECs for Initial Implementation Testing, Migration Testing and Regression Testing. SATE takes CLEC pre-order and order transaction requests, passes the requests to the stand-alone database, and returns responses to the CLEC user. SATE uses pre-defined test account data and requests that are subject to the same BPL IMA/EDI edits as those used in production. The SATE is intended to mirror the production environment (including simulation of all legacy systems). SATE is part of the Customer Test Environment.
Technical Specifications	<p>Detailed documentation that contains all of the information that a CLEC will need in order to build a particular release of an OSS application-to-application interface. Technical Specifications include:</p> <ul style="list-style-type: none"> • A chapter for each transaction or product which includes a business (OBF forms to use) description, a business model (electronic transactions needed to complete a business function), trading partner access information, mapping examples, data dictionary <p>Technical Specification Appendices for IMA include:</p> <ul style="list-style-type: none"> • Developer Worksheets • IMA Additional Edits (edits from backend OSS systems) • Developer Worksheets Change Summary (field by field, release by release changes) • EDI Mapping and Code Conversion Changes (release by release changes) • Facility Based Directory Listings • Generic Order Flow Business Model <p>The above list may vary for non-IMA application to application interfaces</p>
Version	A version is the same as an OSS Interface Release (Major or Point Release)

¹ 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

² Throughout this document, the terms “include(s)” and “including” mean “including, but not limited to.”

GLOSSARY OF TERMS

ANSI	<i>American National Standards Institute</i>
ATIS	<i>Alliance for Telecommunications Industry Solutions</i>
CMP	<i>Change Management Process</i>
ECIC	<i>Electronic Communications Implementation Committee</i>
EDI	<i>Electronic Data Interchange</i>
FCC	<i>Federal Communications Commission</i>
GUI	<i>Graphical User Interface</i>
ITU	<i>International Telecommunications Union</i>
LOI	<i>Letter of Intent</i>
LSR	<i>Local Service Request</i>
NRIC	<i>Network Reliability and Interoperability Council</i>
OBF	<i>Ordering and Billing Forum</i>
OIS	<i>Outstanding Issue Solution</i>
OSS	<i>Operational Support Systems</i>
POC	<i>Point Of Contact</i>
RN	<i>Release Notification</i>
TCIF	<i>Telecommunications Industry Forum</i>

PHX/1289344.1/67817.150

¹ 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

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

Concept Agreed To?	Language Agreed To?	Issue #	Issue	Allegiance	AT&T	Covad	Eschelon	Qwest	WorldCom	Total
Yes	Language available; pending Redesign Team review	I.A.12.	Qwest to propose language on the criteria used to determine method of implementing regulatory changes. (CMP Issues Log # 243.)	8	2	1	4	1	2	18
Yes	Yes	I.A.9.	Provide a decision on whether to provide copies of documentation regarding prioritization and sizing. (CMP Issues Log # 196.) This issue includes completion of the prioritization process within CMP (CMP Gap Analysis ## 117 - 120 & 124.) [Late Adder]	9	3	3	2	2	8	27
Yes	Language available; pending Redesign Team review		Also, discuss the Special Change Request Process (SCRFP)							
Yes	Language available; pending Redesign Team review	I.A.11.	What is the status of a change when the escalation or dispute resolution is invoked? (CMP Issues Log # 226) Embedded within this issue is the imbalance in treatment that CLEC CRs receive versus Qwest CRs. (CMP Gap Analysis # 20.) [Postponement language]	1	8	8	1	5	7	30
Yes	Yes	I.A.2.	State the criteria for Deny (reasons why) for the CR process. (CMP Issues Log #118; CMP Gap Analysis # 59.)	11	1	2	5	4	9	32
Yes	Pending Qwest modification	I.A.1	Review the CR process to insure that the description of the output of each step of the process is clearly defined; i.e., LOE (range of hours) and affinity. (CMP Issues Log #214; CMP Gap Analysis # 121 - 123.)	6		5	9	3	6	35
Yes	Pending modification	V.c.	What changes are CLEC-impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected? (CMP Issues Log # 110 & 179.) 3/18: Team agreed that this item pertains to the IT Help Desk and ISC help desk relationship.	2	10	7	6	7	4	36
Yes	Language available; pending Redesign Team review	I.A.7.	Where will a CR that impacts both an OSS interface and process be addressed - at the Systems or Product/Process CMP Meeting? We will need to develop language to address this issue. (CMP Issues Log # 163.) Embedded in this issue is Part B of AT&T's February CMP Comments: product/process must be addressed at least to the extent that there is a process to handle crossover issues. [Crossover CR]	10	4	4	7	10	3	38

Concept Agreed To?	Language Agreed To?	Issue #	Issue	Allegiance	AT&T	Covad	Eschelon	Qwest	WorldCom	Total
Yes	Pending Qwest modification	III. Part H	The significant CMP Product/Process issues need to be resolved in order for Qwest to rely on its SGAT as support for its section 271 application. References to Qwest PCATs and Technical Publications in the SGAT cannot change the existing SGATs and interconnection agreements. However, to the extent that Qwest wishes to change the terms of the SGAT by its PCATs or Technical Publications, there must be an effective, balanced industry process that controls the changes to those product documents. CMP Product/Process is currently a "notice and go" process. Qwest tells CLECs that Qwest is changing something and then Qwest implements the change. There is only discussion after the fact. This process must be more collaborative. CLECs should have input into changes before they are implemented. See also CMP Gap Analysis # 20 - 22 & 114. 1 [Qwest-initiated Product/Process Change Process]	5	9	9	11	6	1	41
Yes	Pending	I.A.6.	What is the process to manage changes to performance reporting calculations, etc.? How do we handle the overlaps between what is being negotiated at the CMP Redesign and CPAP-like procedures? (CMP Issues Log # 158.) This includes establishing a process connection between PIDs and CMP as described in Part F of AT&T's February CMP Comments.	4	5	11	8	9	5	42
Yes	Yes	I.A.3.	Determine whether a process is necessary to address non-coding changes. (CMP Issues Log #137.)	7	7	6	10	8	10	48
Yes	Yes	V.d.	What is CMP's role in rate changes or rate "validation"? (CMP Gap Analysis # 1 & 2.)	3	11	10	3	11	11	49

ATT Priority List--Ranking of "0's"

Concept Agreed to?	Language Agreed To?	Issue
Yes	I.A.10 Pending modification	Qwest to continue what the guidelines are for when an issue is appropriate for the CMP vs. when the Account team should handle it. (CMP Issues Log #216)
Yes	Yes	What are the criteria used to determine "level of effort" (i.e., S, M, L, XL) for a release? (CMP Issues Log #146.)
Yes	Yes, pending action item #272	Clarify what notices will be communicated to CLECs via email, mail-outs, communications, and posted on the web site. (CMP Issues Log # 156.) This also relates to CMP Gap Analysis # 101: "We continue to receive notices for scheduled system downtime on too short notice (i.e., on 1/10/02 at 5:30 p.m. received notice on DLIS being down 1/12/02 all day). We have discussed in Redesign having Qwest provide these notices further in advance. We would like to receive them at least 5 business days in advance."
Yes	Yes	Defined Terms used in the Redlined Draft CMP Document must be concluded. (CMP Issues Log ##106, 133, 141, 162, 182 & 248.)
Yes	Pending modification	What process will be used to make changes to CMP once it has been "re-designed"? By what method does Qwest propose to prove that it has actually implemented changes as it represents it has done/is doing/will do? (CMP Gap Analysis # 103. Also CMP Gap Analysis # 446.) 3/18/02: Combined with WorldCom issue.
Yes	Pending modification	SGAT Section 12.2.6. (CMP Gap Analysis ## 148 & 149.)
Yes	Yes	Clarification of Scope of Issue. In its List, AT&T identified the issue of "[w]hat changes are CLEC impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected?" AT&T List, p. 7, subpoint (c). Covad agrees that this is an issue requiring resolution before Section 271 relief may be given, but clarifies that it believes this issue must be addressed in terms of (1) product, process and systems changes that are CLEC-impacting, and (2) retail changes that may be CLEC-impacting. 4/03/02: Captured as separate issue, Covad Issue#3.
Yes	Pending language	agreed upon and included in the parties' Master Redlined CLEC-Qwest CMP Redesign Framework Interim Draft (i.e. the "CMP contract"). Currently, while the parties have agreed in principle on the method and use of an exception process in connection with the CMP, that agreement is not reflected in the master redlined document. Accordingly, while this remains an issue to be resolved, Covad believes it is non-controversial and can be quickly and easily accomplished by the parties.
OPEN	Pending CLECs review of Qwest provided Retail-Wholesale documents	Clarification of Scope of Issue. In its List, AT&T identified the issue of "[w]hat changes are CLEC impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected?" AT&T List, p. 7, subpoint (c). Covad agrees that this is an issue requiring resolution before Section 271 relief may be given, but clarifies that it believes this issue must be addressed in terms of (1) product, process and systems changes that are CLEC-impacting, and (2) retail changes that may be CLEC-impacting.
OPEN	Ongoing Redesign Team review	Change Management Improvement Document and Process to deploy Qwest CMP improvements. (Action Item #231) 3/18/02: Combined with ATT issue V.e--By what method does Qwest propose to prove that it has actually implemented changes as it represents it has done/is doing/ will do? (CMP Gap Analysis #103, 116)

3.4 QWEST INITIATED PRODUCT/PROCESS CHANGE PROCESS

[March 19, 2002, CMP Redesign: Following is a process Qwest will implement as Qwest and CLECs further evaluate and modify it. Further action will be taken by the CMP Redesign team as follows. CLECs and Qwest will review product/process notices issued over the last few months in order to make the list of categories in each "Level" more exhaustive. This initial effort should be completed by April 16, 2002. After this review, CLECs and Qwest will baseline this process, add it to the Interim draft master redline document and implement it as modified.]

The following defines four levels of Qwest-initiated product/process changes and the process by which Qwest will initiate and implement these changes. None of the following shall be construed to supersede timelines or provisions mandated by federal or state regulatory authorities, certain CLEC facing websites (e.g. ICONN and Network Disclosures) or individual interconnection agreements. The lists provided below are exhaustive/ finite, but may be modified by agreement of the parties[Discuss how the levels will be modified long term]. Qwest will utilize these lists when determining the disposition (e.g. level 1–4) to which new changes should be categorized. The changes that go through these processes are not changes to systems.

3.4.1 Level 1 changes

Level 1 changes are defined as changes that do not alter CLEC operating procedures or are time critical corrections. Time critical changes may alter CLEC operating procedures, but only if such changes have first been implemented through the appropriate procedure under CMP for such changes. Level 1 changes are effective immediately upon notice. In the event the CLEC believes that its operating procedures are altered by the change, the CLEC will immediately notify the Qwest CMP manager by e-mail. Qwest will promptly respond to the CLEC and work to resolve the issue.

Level 1 change categories are:

- Verbiage clarifications/wordsmithing
- Providing additional information such as:
 - Additional information regarding existing products (e.g. Premium Listing)
 - Documentation concerning existing processes not previously documented (e.g. inside wiring)
 - New feature downloadable within a PCAT for existing feature not previously documented
- Corrections that do not change the initial purpose of a document
- Corrections to synch up documentation with systems capabilities
- Modifications to frequently asked questions
- Re-notifications issued within 6 months after initial notification (notice will include reference to date of initial notification)
- Training schedule changes (note: training schedules are posted quarterly, if a class is cancelled, notification is provided 2 weeks in advance. If a class is added, it is posted as soon as possible)
- Typo corrections, grammar corrections, product branding changes
- Update Invalid Contact Information

- Update Contacts lists when contact no longer work for Qwest (e.g. Escalation Contacts List)
- Contact information updates from organizational changes
- URL changes with redirect link

For any change that Qwest considers a Level 1 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

3.4.1.1 Level 1 Process/Deliverables

For Level 1 changes, Qwest will provide a notification to CLECs. Level 1 notifications will state the disposition (e.g. level 1), description of change, changes are effective immediately, that there is no comment cycle and will advise CLECs to contact the CMP Manager immediately if the change alters the CLECs operating procedures and requires Qwest's assistance to resolve. In addition, Qwest will provide the following for PCAT and NonFCC Technical Publication ("Tech Pub") changes:

- A web notification form that includes an exact cut and paste of the changes highlighted in green (PCAT) or redlined (Technical Publications). If necessary, additional text above and below the changes will be provided for context.
- A history log that tracks the changes

Note: For typo corrections, grammar corrections, and product branding changes to PCATs and NonFCC Tech Pubs notifications, web change forms will not be provided. The changes will be documented in the history log for the document to which the changes were made.

3.4.2 Level 2 changes

Level 2 changes are defined as changes that have minimal effect on CLEC operating procedures. Qwest will provide notice of Level 2 changes at least 21 calendar days prior to implementation.

Level 2 change categories are:

- Email address changes
- TN changes
- FAX TN changes
- Changes to existing Web content
 - Remove data stored under archive links after certain time period
 - Eliminate a re-direct link
 - Add new functionality (e.g. CNLA)
- Re-notifications issued 6 months or more after the initial notification (notice will include reference to date of initial notification)
- Updates (e.g. CLEC Questionnaire)

For any change that Qwest considers a Level 2 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

3.4.2.1 Level 2 Process/Deliverables

For Level 2 changes, Qwest will provide a notice to CLECs. Level 2 notifications will state the disposition (e.g. level 2), description of change, proposed implementation date,

and CLEC/Qwest comment cycle timeframes. In addition to the notice, any documentation changes required to PCATs and Non-FCC Tech Pubs (red-line for Tech Pubs and green highlights for PCATs) will be available for review in the Document Review section of the CMP Website (<http://www.qwest.com/wholesale/cmp/review.html>), commonly known as the document review site. In the document review site, a comment button will be available next to the document to allow CLECs to provide comments. For Level 2 changes that do not impact PCATs or NonFCC Tech Pubs, a comments link will be provided within the notification for comments.

Qwest must provide initial notice of Level 2 changes at least 21 calendar days prior to implementation and adhere to the following comment cycle:

- CLECs have 7 calendar days following initial notification of the change to provide written comments on the notice
- Qwest will reply to CLEC comments no later than 7 calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date.
- Qwest will implement no sooner than 21 calendar days from the initial notification.

CLECs may provide General comments regarding the change (e.g., clarification, request for modification). Comments must be provided during the comments cycle as outlined for level 2 changes.

For general comments, Qwest will respond to comments and provide a final notice of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and NonFCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above. If there are no CLEC comments, a final notice will not be provided and the changes will be effective according to the date provided in the original notification.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate or pursue dispute resolution in accordance with the agreed upon CMP Escalation or Dispute Resolution procedures.

3.4.3 Level 3 changes

Level 3 changes are defined as changes that have moderate effect on CLEC operating procedures and require more lead-time before implementation than Level 2 changes. Qwest will provide initial notice of Level 3 changes at least 31 calendar days prior to implementation.

Level 3 change categories are:

- Changes to whether fields are required
 - Use of manual handling field during manual process
- NC/NCI code changes
- Product enhancements (excluding resale) that do not drive new processes
- Customer-facing Center hour changes
- New manual process
 - Feature verification for large CSRs
 - Working TNs for Resale Centrex

- Modify/change existing manual process
 - Change manual reject reasons
 - Modify manual jeopardy form
- Change CLEC facing process to improve process gaps
 - Service/Account Manager identifies a gap in process based on a CLEC ADHOC inquiry

3.4.3.1 Level 3 Process/Deliverables

For Level 3 changes, Qwest will provide a notice to CLECs. Level 3 notifications will state the disposition (e.g. level 3), description of change, proposed implementation date, and CLEC/Qwest comment cycle timeframes. For Level 3 notifications that Qwest believes represent a new change category under Level 1 or Level 2, Qwest should propose such new change category in the notice and CLECs and Qwest will discuss the proposal in the next monthly Product & Process CMP meeting. In addition to the notice, any documentation changes required to PCATs and Non-FCC Tech Pubs (red-line for Tech Pubs and green highlights for PCATs) will be available for review in the Document Review section of the CMP Website (<http://www.qwest.com/wholesale/cmp/review.html>), commonly known as the document review site. In the document review site, a comment button will be available next to the document to allow CLECs to provide written comments. For Level 3 changes that do not impact PCATs or Non-FCC Tech pubs, a link will be provided within the notification for comments.

Qwest will provide initial notice of Level 3 changes at least 31 calendar days prior to implementation and adhere to the following comment cycle:

- CLECs have 15 calendar days following initial notification of the change to provide written comments on the notice
- Qwest will reply to CLEC comments no later than 15 calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g. requested change requires significant research, information is required from national standards body or industry (e.g. Telcordia)), Qwest's response will indicate the course of action Qwest is taking and Qwest will provide additional information when available. Once the information is available Qwest will provide a notification and any available updated documentation (e.g. Tech Pubs, PCATs) at least 15 calendar days prior to implementation.
- Qwest will implement no sooner than 15 calendar days after providing the response to CLEC comments. For example, if there are no CLEC comments, Qwest may send out a final notification on the first day following the CLEC cut-off for comments (day 16 after the initial notification). Thus, implementation would be 31 days from the initial notification. However, if Qwest does not respond to the CLEC comments until the 15th day after the CLEC cut-off for comments, the earliest possible implementation date would be 45 calendar days from the initial notification.

CLEC comments must be provided during the comment cycle as outlined for Level 3 changes. Comments may be one of the following:

- General comments regarding the change (e.g., clarification, request for modification)
- Request to change disposition of Level. If the request is for a change to Level 4, the request must include substantive information to warrant a change in disposition (e.g. business need, financial impact).

- Request to change disposition to a Level 1 or Level 2 doesn't have to include substantive information to warrant a change.
- Request for postponement of implementation date, or effective date

For general comments, Qwest will respond to comments and provide a final notice of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and NonFCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above.

CLECs and Qwest will discuss requests to change the disposition Level of noticed changes, or to establish new change categories under Levels 1 – 4, at the next monthly Product & Process CMP meeting. In the event that the parties are not able to reach consensus on any such request, CLECs and Qwest will take a vote of the parties in attendance at the meeting. The result will be determined by the majority. If the disposition Level of a change is modified, from the date of the modification forward such change will proceed under the modified Level. When a change to the disposition Level of a particular notice also suggests that a new category of change be established under one of the Levels, a separate vote shall be taken for each.

For a request for postponement, Qwest will follow the procedures as outlined in Section 4 of this document.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate or pursue dispute resolution in accordance with the agreed upon CMP Escalation or Dispute Resolution procedures.

3.4.4 Level 4 Changes

Level 4 changes are defined as changes that have a major effect on existing CLEC operating procedures or that require the development of new procedures. Level 4 changes will be initiated using the CMP CR process and provide CLEC an opportunity to have input into the development of the change prior to implementation.

Level 4 change categories are:

- New products, features, services (excluding resale)
- Interval changes
 - Increase FOC to 72 hours
 - Changes to Standard Interval Guide (SIG)
 - Change a wire center's status of MSA/ nonMSA or Zone 1 or 2 distinction resulting in a change to the M&R and Provisioning interval
- Change to a pre-order step
 - Need to populate appointment scheduler
 - Check facility availability
- New processes related to product enhancements
 - Add Shared Distribution Loop as an additional sub-loop element
 - Extension tech on UBL
 - New features with new processes
- New PCAT for new processes

3.4.4.1 Level 4 Process/Deliverables

Qwest will submit a completed Change Request no later than 14 calendar days prior to the CMP Product and Process Monthly Meeting. At a minimum, each Change Request will include the following information:

- A description of the proposed change
- A proposed implementation date (if known)
- Indication of the reason for change (e.g., regulatory mandate)
- Basis for disposition of level 4

Within two (2) business days from receipt of the 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.

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 identifies the CR subject matter expert (SME) and the SME's Director.
- The CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
 - Description of CR
 - Assigned CRPM
 - Assigned CR number
 - Designated Qwest SME(s) and associated director(s)

Qwest will present the Change Request at the monthly Product and Process CMP meeting. The purpose of the presentation will be to:

- Clarify the proposal with the CLECs
- Confirm the disposition (e.g., level 4) of the Change (see below). If during the CMP meeting CLECs agree to change the disposition, then the type of change being made will be added to the list for the disposition to which it is changed.
- Propose suggested input approach (e.g., a 2 hour meeting, 4 meetings over a two week period, etc.), and obtain consensus for input approach.
- Confirm deadline, if change is mandated
- Provide proposed implementation date, if applicable

At the monthly CMP meeting, the parties will discuss whether to treat the Change Request as a Level 4 change. If the parties agree, the Change Request will be reclassified as a Level 1, 2 or 3 change, and the change will follow the process set forth above for Level 1, 2, or 3 changes, as applicable. If the parties do not agree to reclassify the Change Request as a Level 1, 2 or 3 change, the following process will apply:

- The parties will develop a process for Qwest to obtain CLEC input into the proposed change. Examples of processes for input include, but are not limited to, one-day conferences, multi-day conferences, or written comment cycles.

- After completion of the input cycle, as defined during the CMP meeting, Qwest will modify the CR, if necessary, and design the solution considering all CLEC input.
- For Level 4 changes, when the solution is designed and all documentation is available for review, a notice of the planned change is provided to the CLECs. This notice will be provided at least 31 calendar days prior to implementation. The notice will contain reference to the original CR, proposed implementation date, and the CLEC/Qwest comment cycle. In addition, any documentation changes required to PCATs and Non-FCC Tech Pubs will be available for review in the document review site (red-line for Tech Pubs and Red-line for Tech Pubs) with a Comment button available to provide written comments. For Level 4 changes that do not impact PCATs or NonFCC Tech Pubs, a comments link will be provided within the notification.
- CLECs have 15 calendar days following notification of the planned change to provide written comments on the notice
- Qwest will reply to CLEC comments no later than 15 calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g. requested change requires significant research, information is required from national standards body or industry (e.g. Telcordia)), Qwest's response will indicate the course of action Qwest is taking and Qwest will provide additional information when available. Once the information is available Qwest will provide a notification and any available updated documentation (e.g. Tech Pubs, PCATs) at least 15 calendar days prior to implementation.
- Qwest will implement no sooner than 15 calendar days after providing the response to CLEC comments. For example, if there are no CLEC comments, Qwest may send out a final notification on the first day following the CLEC cut-off for comments (day 16 after the initial notification). Thus, implementation would be 31 days from the initial notification. However, if Qwest does not respond to the CLEC comments until the 15th day after the CLEC cut-off for comments, the earliest possible implementation date would be 45 calendar days from the initial notification.

CLEC comments must be provided during the comment cycle as outlined for Level 4. CLEC comments may be one of the following:

- General comments regarding the change (e.g., clarification, request for modification)
- Request for stay or delay implementation, or effective date for which comments are being provided.

For general comments, Qwest will respond to comments and provide a final notice of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and NonFCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above.

For a request to stay or delay, Qwest will follow the procedures as outlined in Section 4 of this document.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate the CR or pursue dispute resolution in accordance with the agreed upon CMP Escalation or Dispute Resolution procedures.

PHX/1289281.1/67817.150

Change Management Process (CMP) Improvements – 11-26-01

Revised 3-29-02

Improvement	Implementation Date(s)
Scope	October 2001
Standard Naming Convention	August 2001
Web Site Improvements	October 2001
Customer Notification Letter Archive – Searchable Website Database	January 2002
CMP Process Improvements <ul style="list-style-type: none"> - 1. CR Clarification Meetings - 2. Meeting Distribution Package - 3. Meeting Minutes - 4. CR Tracking and Reporting Database - 5. CR Project Management - 6. Interactive CR Reports 	1. August 2001 2. September 2001 P&P October 2001 Systems 3. August 2001 P&P September 2001 Systems 4. September 2001 P&P October 2001 Systems 5. August 2001 6. November 2001
Escalation and Dispute Resolution Process Redesign Improvements <ul style="list-style-type: none"> - 1. Process - 2. Web Site 	1. November 2001 2. November 2001
Interim Exception Process	September 2001
OSS Interface 12 Month Development View <ul style="list-style-type: none"> - 1. Updated on web - 2. Most recent presentation at CMP 	1. November 2001 2. January 2002
CLEC/Qwest Initiated OSS Interface CR Process Redesign Improvements <ul style="list-style-type: none"> - 1. Process - 2. Form 	1. October 2001 2. Revised November 2001
CLEC Initiated Product and Process CR Process Redesign Improvements <ul style="list-style-type: none"> - 1. Process - 2. Form 	1. October 2001 2. Revised 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	IMA 10.0 August 2001 and late October/ early November 2001 IMA 11.0 February 2002
Introduction of New OSS Interface	Ready when applicable
Web Tool to Support CLEC Comments	November 2001
Retirement of OSS Interface	Ready when applicable
Changes to an Existing OSS Application to Application Interface <ul style="list-style-type: none"> - Draft Technical Specifications Walkthrough - CLEC Comment Cycle - Final Technical Specifications - CLEC Testing 	Effective with IMA 10.0 Release
Changes to an Existing GUI	Effective with IMA 10.0

- Draft User Guide - CLEC Comment Cycle - Final User Guide	Release
OSS IMA EDI Versioning	In Effect
3 Major/3 Point IMA Releases per Year	In Effect
IMA Releases no Less than 3 Months Apart	In Effect
Modification of Past Versions of IMA EDI	In Effect
Interface Testing Environment - SATE	SATE Available with IMA 9.0
Production Support	February 2002
Qwest Initiated Product and Process CR Process	April 2001